



*COPS in Schools*

# COPS in Schools

## Grant Owner's Manual





## *COPS in Schools* Grant Owner's Manual

The following manual was created to assist COPS in Schools grantees with the administrative and financial matters associated with the grant.

For more information about your COPS in Schools grant, contact your COPS Grant Program Specialist. If you do not know who your Grant Program Specialist is, or do not know his/her telephone number, contact the U.S. Department of Justice Response Center at 1-800-421-6770.

U.S. Department of Justice  
Office of Community Oriented Policing Services  
1100 Vermont Avenue, NW  
Washington, DC 20530  
(For overnight delivery, please use 20005 as the zip code.)

COPS Office Internet web site: <http://www.usdoj.gov/cops/>

April 2001



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## *Getting Started*

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Congratulations on receiving a grant from the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS). Your COPS in Schools grant provides funding directly to local, state and tribal jurisdictions for the hiring and deployment of career law enforcement officers in and around primary and secondary schools. COPS in Schools was designed to provide an incentive for law enforcement agencies to build working relationships with schools to use community policing efforts to combat school violence.

This COPS in Schools Grant Owner's Manual will assist you with the administrative and financial matters associated with your grant. It was developed by the COPS Office in conjunction with COPS Accounting Operations to ensure that all COPS in Schools grantees clearly understand and meet the requirements of their grants. Please do not hesitate to call the COPS Office through the Department of Justice Response Center at 1-800-421-6770 if you need assistance with the implementation of your grant.

Thank you for providing us with the opportunity to work in partnership with your community.

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## *Glossary of Terms*

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### **Allowable costs**

Allowable costs are costs that will be paid for by this grant program. COPS in Schools provides funding for the salaries and approved fringe benefits for three years for sworn entry-level, lateral transfer, or rehired officers. Upon review of your submitted budget, any unallowable costs were removed and your total budget amount was revised accordingly. A copy of the budget clearance memorandum from COPS Accounting Operations identifying these revisions is included in your award package. Overtime, training (other than salary and benefits paid during training), weapons, communication equipment, uniforms, vehicles, and indirect costs are not allowable costs.

### **Authorized Official**

The authorized official is the individual in your organization who has final responsibility for all programmatic and financial decisions regarding this grant award.

### **Award Start Date**

This is the date on or after which your agency is authorized to spend funds to hire new officers. This date is found on your original award document. Grantees may not expend funds or hire officers prior to this date without the written approval of the COPS Office.

### **Catalog of Federal Domestic Assistance (CFDA)**

The CFDA is a government-wide publication orchestrated by the General Services Administration, and is published annually. The CFDA contains a description and index of all forms of Federal assistance available from the Federal government. Each grant-making agency is responsible for submitting descriptions of their programs. Each program is assigned a “CFDA number,” which is used by auditors in tracking grant revenues under the Single Audit Act. It is also used in participating states by state Single Points of Contact for intergovernmental reviews under Executive Order 12372. The COPS in Schools CFDA number is 16.710.

### **Career law enforcement officer**

The COPS statute defines a “career law enforcement officer” as an officer hired on a permanent basis who is authorized by law or by a state or local public agency to engage in or supervise the prevention, detection, or investigation of violations of criminal law.

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### **Cognizant Federal Agency**

Your Cognizant Federal Agency is generally the Federal agency that provides you with the most Federal money. Your Cognizant Federal Agency may have already been assigned to you by the Office of Management and Budget. If this is the first Federal grant that your organization has received, the U.S. Department of Justice (DOJ) is your Cognizant Federal Agency. Your Single Audit Act reports should be sent to the U.S. Department of Justice's Clearinghouse at:

*Federal Audit Clearinghouse  
Bureau of Census  
1201 E. 10th Street  
Jeffersonville, IN 47132*

### **COPS Accounting Operations**

COPS Accounting Operations handles your financial and budgetary needs related to the COPS in Schools grant. There is a staff accountant assigned to your state who is available to answer any questions that you may have concerning the financial aspects of your COPS in Schools grant. To identify your staff accountant, refer to the Budget Clearance Memorandum enclosed in your award package, or call the U.S. Department of Justice Response Center at 1-800-421-6770.

### **COPS Office**

The Office of Community Oriented Policing Services (COPS) is the division of the U.S. Department of Justice that is your "grantor agency" for your COPS in Schools grant. The COPS Office is responsible for administering your grant for the entire grant period. You can reach the COPS Office at 1-800-421-6770.

### **Grant Number**

This number is in the following format: 1999-SH-WX-0000 for grants awarded in Fiscal Year 1999 and grants awarded in fiscal year 2000 will be numbered as follows: 2000-SH-WX-0000. This number can be found on your Award Page. It is assigned by COPS Accounting Operations, and should be used when corresponding with that department. This will aid the accounting staff in determining to which grant you are referring.

### **Matching funds**

Under the COPS in Schools program, the COPS Office will fund up to \$125,000 per officer for the entry-level salaries and approved fringe benefits for each new or rehired law enforcement officer. If the total project cost is greater than \$125,000 per officer over the three-year period, then the grantee must pay the remaining portion as its local share. This share must be a cash match, and must be paid with state or local funds. The source of your agency's local match may not be



from any funds previously budgeted for law enforcement purposes. There is no waiver of the local match under the COPS in Schools program.

**Obligation of funds**

Federal funds are considered “obligated” when the grant award document is signed by the Director of the COPS Office or his designated official. Funds are reserved against the grant until all the grant monies are spent or refunded to the Federal government. Local funds are considered “obligated” when the salaries and benefits have been paid or will be paid for work performed by the officer(s) during a previous pay period.

**OJP EIN Number / Vendor Number**

This number is usually your agency's nine-digit Federal tax identification number assigned to you by the IRS. Your accounting/bookkeeping department should have this number. In some cases, the EIN has been previously assigned to another agency within your jurisdiction. In that instance, a new vendor number will be assigned to you by the COPS Office. The new assigned number is to be used by COPS for administrative purposes only and should not be used for IRS purposes.

**ORI Number (Originating Agency Identifier)**

This number is assigned by the FBI, and it is your agency's identifier. The first two letters are your state abbreviation, the next three numbers are your county's code, and the final two numbers identify your jurisdiction within the county. It can be found on your grant award document. When you contact the COPS Office with a question, you may provide the ORI number or your grant number, and we will be able to assist you.

**The Public Safety Partnership and Community Policing Act of 1994**

The COPS Office is charged with fulfilling the mandates of this law (the “COPS statute”). The purposes of the law are to:

- Substantially increase the number of law enforcement officers interacting with members of the community;
- Provide additional and more effective training to law enforcement officers to enhance their problem-solving, service and other skills needed in interacting with members of the community;
- Encourage the development and implementation of innovative programs to permit members of the community to assist law enforcement agencies in the prevention of crime; and



- Encourage the development of new technologies to assist law enforcement agencies in reorienting the emphasis of their activities from reacting to crime to preventing crime.

### **School Resource Officer**

The COPS statute defines a “School Resource Officer” as a career law enforcement officer, with sworn authority, deployed in community oriented policing, assigned by the employing police department or agency to work in collaboration with schools and community-based organizations to:

1. address crime and disorder problems, gangs, and drug activities affecting or occurring in or around an elementary or secondary school;
2. develop or expand crime prevention efforts for students;
3. educate likely school-age victims in crime prevention and safety;
4. develop or expand community justice initiatives for students;
5. train students in conflict resolution, restorative justice, and crime awareness;
6. assist in the identification of physical changes in the environment that may reduce crime in or around the school; and
7. assist in developing school policy that addresses crime and recommend procedural changes.

### **Supplanting**

For the purpose of your COPS in Schools grant, supplanting means replacing state or local funds which otherwise would have been spent on hiring sworn officer positions with Federal COPS funds. You are prohibited from supplanting throughout the three-year grant period. This means that you may not use COPS funds to pay for any sworn officer positions (full-time, part-time, reserve, or other paid officer positions) who otherwise would have been employed with state or local funds regardless of the COPS program. For further information, please see Grant Condition #2.



## ***I. Grant Acceptance, Terms, and Conditions***

In order to officially begin your grant, you will need to review the Award Page and grant conditions, sign the Award Page or Modified Award Page, and return the original to:

**COPS in Schools Control Desk  
Office of Community Oriented Policing Services (COPS)  
8th floor  
1100 Vermont Avenue, NW  
Washington, DC 20530**

You will not be able to draw down any grant funds until the COPS Office receives your signed Award or Modified Award Page and special conditions page, and your budget has been cleared by COPS Accounting Operations.

### ***The Award Page***

The Award Page is the one-page, double-sided document indicating your official grant funding amount, the award number, the award date, and the grant time period.

The award date for your COPS in Schools grant can be found on the Award Page. Federal funds for any allowable costs you incur on or after the award date will be reimbursed to you. The duration of your COPS in Schools grant is three years.

Your grant award number is in the following format: 1999-SH-WX-0000 for grants awarded in Fiscal Year 1999 or 2000-SH-WX-0000 for grants awarded in Fiscal Year 2000. If you have any questions regarding your grant, please refer to your grant award number or your agency's ORI number when calling for assistance. Both can be found on your Award Page.

The Award Page is preprinted with your law enforcement and government officials' names and addresses. If this information is incorrect or has changed, please correct it on the enclosed change of information page and mail it to your Grant Program Specialist.

What is a Modified Award?

In a small number of cases, a Modified Award Page may be included in this mailing. The final grant amount on this document may differ from the estimated amount on your original Award Page, because the final grant amount is based upon your approved budget. If you are



receiving a Modified Award, take careful note of the change between your estimated award amount on the original document and the actual amount on the Modified Award Page. If you have any questions about the modification, refer to your budget clearance memorandum. If you still have questions, please contact COPS Accounting Operations. After you review and understand the award document, please sign, make a copy for your records, and mail the original back to the COPS Office with your payment selection sheet.

### *Grant Conditions*

The grant conditions are the terms listed on the back of your Award Page. By accepting this grant, you are entering into an agreement with the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS). As part of that agreement, you agree to 13 grant conditions (and possibly additional conditions specific to your agency), as well as to the COPS in Schools additional training requirement condition. The section that follows describes in detail each of the award conditions, its rationale and its implications. It also addresses many commonly asked questions.

In some cases, your agency may receive a special grant condition. You will be unable to access your grant funds until you have satisfied this condition. For example, you will not be able to draw down funds until your budget receives final clearance. If you receive an award with a budget special condition, your budget has not yet received final clearance. In those cases, you will receive notification in writing when your special condition has been met. After reviewing your Award Page and other grant documents, it should be clear to you which grant conditions, if any, would prevent drawdowns from being made until those conditions have been satisfied. If you have any questions about these conditions, please call your Grant Program Specialist.

Reasons for grant conditions

The requirements of your COPS in Schools grant are established within:

- The Public Safety Partnership and Community Policing Act of 1994, under which the COPS Office was established; and
- Applicable rules, regulations and policies issued by the U.S. Department of Justice (DOJ), Office of Management and Budget (OMB), the General Accounting Office (GAO), and the United States Treasury.



A list of source documents for this booklet is provided in Appendix A. You may request copies of any of these materials from:

**Office of Administration, Publication Unit  
New Executive Office Building, Room G 236  
Washington, D.C. 20503**

or from the COPS Office.

Review of grant conditions

#### 1. ALLOWABLE COSTS

The funding under this project is for the payment of salaries and approved fringe benefits for three years for sworn entry-level career law enforcement officers, lateral transfers, or rehired officers. Any portion of salaries above entry-level must be provided for by the grant recipient. Overtime, training, weapons, communication equipment, and vehicles cannot be paid for with COPS funding. In addition, 75% of the time for the officers deployed to work in the schools must be spent in and around the schools working on youth related activities.

#### **Rationale:**

As the program materials state, COPS in Schools is a program that funds only entry-level salaries and benefits for the hiring or rehiring of career law enforcement officers.

#### **Action:**

To be eligible for payment under the grant, a salary must be reasonable for the services rendered, and must be paid to an officer appointed after the grant award start date under the laws or rules governing hiring by your agency. Salary payments must be based on payroll records supported by time and attendance records or their equivalent. The types of records required to document that you are following this grant condition are described in Section IV of this Manual.

Fringe benefits may be paid if they are part of a reasonable compensation package offered to your employees. Particular items of fringe benefits must fall within the categories authorized by the COPS Office. Authorized fringe benefits include FICA, Social Security, Medicare, health insurance, life insurance, vacation, sick leave, retirement, worker's compensation, and unemployment insurance. Equipment, overtime, training, uniforms, weapons, and such costs other than salaries and benefits are not allowed. However, if you train



your officers prior to swearing them in, grant funds may be applied to salaries and benefits paid to the new officers during training.

In addition, the COPS Office requires that 75% of the time of the officer(s) deployed to work in and around the school(s) as a result of this grant, must be spent working in and around school(s) on youth related activities. Please note that your agency may choose to deploy an equal number of veteran locally-funded officers into the schools to fulfill this requirement, while using the COPS grant funds to hire new, additional officers to “backfill” the resulting vacancy. In this scenario, the COPS funds may be spent only on the newly hired, additional officer positions (hired after the grant award start date) and may not be spent to pay for the veteran locally-funded officers who are deployed into the schools. The veteran officers must be deployed into the schools as a direct result of the COPS in Schools grant program and must increase your agency's previous commitment of school resource officers. (Please see Grant Condition #5 for more information).

## 2. SUPPLEMENTING, NOT SUPPLANTING

COPS in Schools grant funds must be used to hire one or more new, additional career law enforcement officers, beyond the number of officers that would be hired or employed by the grantee in the absence of the grant. Unless authorized in writing by the COPS Office, grant funds may not be applied to the salary or benefits of an officer hired by a grantee prior to the grant award start date.

### **Rationale:**

The Public Safety Partnership and Community Policing Act of 1994 specifically states that Federal funds under the COPS programs are not to be used to supplant existing local or state funds.

### **Action:**

To meet this grant condition, you will need to ensure that:

- Each officer that you hire under COPS in Schools is newly hired on or after your grant award start date. You may not fill the COPS in Schools position(s) with any officer who was hired prior to the award start date unless an exception is authorized in writing by the COPS Office;
- The officer(s) that you are hiring brings your sworn force strength to a number over and above the number of officer positions that were budgeted (funded) as of the date of your COPS in Schools



application, plus any additional officer positions budgeted with state or local funds during the grant period;

- Your locally funded budget for sworn officer positions is not reduced as a result of receiving COPS grant funds;
- During the life of your grant, you must continue to hire as many new, locally funded officers as you would have if you had not received your grant. You may not cancel or postpone spending money in your budget that is committed to hiring other new officers; and
- You must take positive and timely steps to fill any locally funded vacancies that were created on or after the date of your grant application by retirement, resignation or other reasons with new locally funded officers. Again, any exception must be authorized in writing by the COPS Office.

If your sworn officer budget is reduced at any time during the COPS grant period, or you are unable to fill locally funded vacancies within your usual time frame, please contact the COPS Office immediately so that we may review your circumstances to determine compliance with this Grant Condition and provide advice on future supplanting compliance.

### 3. RETENTION

Your agency is expected to implement the retention plan submitted with your application to retain the sworn officer positions funded by the COPS in Schools program. The COPS Office will monitor retention for one full locally funded budget cycle after the expiration of the grant award. Under the COPS in Schools Program the retention requirement applies to the officer(s) hired as a result of the COPS in Schools award. If a veteran locally funded officer(s) is deployed to work in and around the school as a result of this grant, then the retention requirement corresponds with the newly hired grant funded officer(s) who was hired to replace the veteran officer(s) as a result of this grant.

#### **Rationale:**

The Public Safety Partnership and Community Policing Act of 1994 envisions that newly created sworn officer positions should be maintained by localities beyond the Federal funding period.

#### **Action:**

Your retention plan should focus on maintaining the additional officer position(s) beyond the life of the grant for at least one full locally funded budget cycle. If, for any reason, the officer originally filling a



position funded by the COPS in Schools grant leaves your department during the retention period, it is anticipated that you will fill the position with a newly hired officer.

#### 4. FISCAL YEAR AND COGNIZANT FEDERAL AGENCY

Prior to withdrawal of funds under the COPS in Schools award, your agency must provide the COPS Office and the Office of the Comptroller with the your organization's fiscal year and the name of your Cognizant Federal Agency.

**Rationale:**

In order to ensure that your agency is in compliance with Federal audit requirements and OMB regulations, the Office of the Comptroller and the Cognizant Federal Agencies must coordinate tracking of all Federal funds awarded through grants. To accomplish this, we need your cooperation in gathering that information.

**Action:**

This information was requested in the application form you submitted to the COPS in Schools program. In most cases, this condition has therefore already been satisfied. However, if you did not provide this information, your Cognizant Federal Agency is generally the Federal department or agency that provides you with the most Federal money. It may have been assigned to your jurisdiction previously by the Office of Management and Budget. If this is your first Federal grant, your Cognizant Federal Agency is the U.S. Department of Justice. Please contact your Grant Program Specialist if you have any questions about the identity of your Cognizant Federal Agency.

#### 5. COMMUNITY POLICING

The COPS Office is responsible for determining the applicability of grant awards to the community policing activities that are identified in grant applications. Community policing activities to be executed by your law enforcement agency will be identified in your COPS in Schools grant application and will be approved by the COPS Office before the grant is awarded. Under the COPS in Schools grant program, there are specific community policing requirements that pertain to this particular grant program. For example, as a result of this grant award an officer must be deployed to work in and around primary and secondary schools on youth related activities for a minimum of 75% of their time. Overall, there must be an increase in the level of community policing activities that are being performed in the schools as a result of receiving a COPS in Schools award.

**Rationale:**

Community policing is a policing philosophy that promotes and supports organizational strategies to address the causes, and reduce the fear, of crime and social disorder. This is achieved through problem-solving tactics and community-police partnerships. It enhances police professionalism by providing officers with the skills, technology, and motivation to act innovatively to solve community crime-related problems. Under the COPS in Schools grant program there are specific community policing requirements that are unique to this program. For example, as a result of this grant there must be an increase in the level of community policing that is being performed in and around the school(s) listed in your grant application.

**Action:**

The COPS Office is responsible for determining the applicability of grant awards to the community policing activities that are identified in grant applications. Under the COPS in Schools grant program, these activities are related to the community policing strategies that were listed in the COPS in Schools narrative addendum that was submitted with your application. Community policing activities that will be executed by local law enforcement agencies are identified in grant applications and approved by the COPS Office before grants are awarded. Subsequent changes to the community policing activities that were listed in your COPS in Schools application should be addressed in programmatic progress reports. Significant changes to the community policing activities identified in a grant application must be submitted in writing to the COPS Office for approval. Under the COPS in Schools grant program this would include changes to the number of dedicated hours that the officers would be deployed to work in and around the schools, a change in the focus school(s) included in the original application, or changes to the types of community policing strategies that the officers will be performing in the schools.

**6. CONTRACTS WITH OTHER JURISDICTIONS**

- a. Officers funded under this grant may only be involved in activities or perform services that exclusively benefit your agency and the population that it serves.

**Rationale:**

This grant is intended to benefit your community. Your agency must use the COPS In Schools grant funding to benefit your population



exclusively rather than “contracting out” the COPS-funded officers to other jurisdictions.

**Action:**

The officer positions that have been funded under the COPS in Schools program cannot be contracted by your agency to other agencies unless they will benefit the population that you serve. If, for example, you are a sheriff's department serving a county with eight small towns, you may contract with one of those small towns to provide them with the services of a COPS in Schools officer, provided such a contract is done in accordance with all of the rules and regulations laid out in this Manual. You may not, however, contract this COPS in Schools officer to a neighboring county.

- b. If your agency receives police services through a contractual arrangement, your agency is responsible for ensuring that the hiring of the officer results in officer deployment into a school within your jurisdiction.

**Rationale:**

When a small town which contracts for law enforcement services from another agency receives a COPS in Schools grant for sworn officers, the small town must ensure that the hiring of the officer(s) results in officer deployment into one or more schools within the small town's jurisdiction.

**Action:**

If you are a small town grantee and you contract with another law enforcement agency for police services, you must use the COPS in Schools grant funds to contract for an additional officer in a manner that will result in officer deployment into a school within your jurisdiction.

## 7. ASSURANCES AND PROGRAM GUIDELINES

The grantee acknowledges its agreement to comply with the assurances and certifications submitted with the COPS in Schools application.

**Rationale:**

Although the U.S. Department of Justice has made every effort to simplify the process for applying for and receiving grants, provisions of Federal law require us to seek your certification regarding certain

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matters. Most of these assurances apply to all grants provided by the Federal government.

**Action:**

When you submitted your original application, there was a list of assurances that you signed and included with your completed application. This condition merely restates your agreement to comply with those assurances.

Another copy of the assurances is contained in Appendix B of this Manual. If you have any questions about them, please contact your Grant Program Specialist.

## 8. REPORTS

In order to assist the COPS Office in the monitoring of your award, your agency will be responsible for submitting programmatic progress reports and quarterly Financial Status Reports. As those reports come due, your Grant Program Specialist and staff accountant can assist you with these forms and information necessary for compliance.

**Rationale:**

The Public Safety Partnership and Community Policing Act of 1994 and other Federal regulations and policies require that financial assistance provided by the Federal government be monitored carefully to ensure the proper use of Federal funds. In addition, the COPS Office seeks to document, on a continuing basis, the progress of our programs and our grantees.

**Action:**

To meet this condition, you will be required to complete a baseline survey (the Community Policing Information Worksheet that was included in your application kit), and fill out yearly programmatic progress report during the course of your COPS in Schools grant, as well as quarterly Financial Status Reports. These reports are discussed extensively in Section V.

## 9. EXTENSIONS

Requests for extensions of the grant award period that merely involve additional time, not additional funding, should be submitted in writing to your Grant Program Specialist not earlier than 90 days before the end of your grant period. [For information on renewing grant funding, refer to the section of this Manual entitled “Extending Your Grant.”]



**Rationale:**

Under Federal regulations, grant extensions that merely request additional time, not additional funding, require prior approval. Without an approved extension, your funding will be automatically stopped at the end of the grant period.

**Action:**

In an effort to reduce the number of extensions given during the grant period, the COPS Office asks that you delay any request for an extension until you are well into your grant and are able to determine accurately when you expect all grant conditions and hiring requirements to be met and all grant funds to be drawn down. When the COPS Office receives and approves your extension request, continued access to your grant monies will be ensured.

10. EVALUATION

The COPS Office may conduct or sponsor national evaluations of the Community Oriented Policing Services (COPS) Program and the COPS in Schools program. The grantee agrees to cooperate with the evaluators.

**Rationale:**

The Public Safety Partnership and Community Policing Act of 1994 states that evaluations of the program may be carried out or commissioned by the Attorney General for the furtherance of the purposes of the Act. The COPS Office plans to conduct evaluations to determine what programs are working, how programs may be improved, and why certain programs are working better than others.

Specifically, the COPS Office may assess the way in which you implement your community policing program. In some jurisdictions, COPS staff may study the effectiveness of funded programs, projects and activities. Evaluators may collect information about the programs' effect on crime, victims of crime, and the quality of life in communities. In addition, they may ask questions about how residents feel about community policing and how police feel about their work. This information will be useful to other communities and police agencies across the country.

**Action:**

When evaluations are undertaken, you may be contacted in writing with specific requests for information. In general, evaluators may

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need to speak with individuals in your department, observe activities of your department, and obtain written reports about and from your department. You will be asked to facilitate any site visits and information-gathering activities. In addition, you will be asked to provide accurate and timely information about your grant activities.

#### 11. GRANT OWNER'S MANUAL

The grantee agrees to abide by the terms, conditions, and regulations as found in the COPS in Schools Grant Owner's Manual and the Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, 28 C.F.R. Part 66.

**Rationale:**

This Manual has been tailored to inform you about the policies, procedures and regulations that apply to your COPS in Schools grant. You will be responsible for the information and rules contained in this Manual. More detailed guidance can be requested through your Grant Program Specialist.

**Action:**

Please read the entire COPS in Schools Grant Owner's Manual carefully prior to signing the grant Award Page. If you have any questions, please contact your Grant Program Specialist to discuss them. When you sign the Award Page, you should ensure that the proper reporting and financial systems are in place to satisfy the requirements.

#### 12. EQUAL EMPLOYMENT OPPORTUNITY PLAN (EEOP)

For grants of \$500,000 or more (or \$1,000,000 or more in grants over an eighteen-month period), the grantee acknowledges that failure to submit an acceptable Equal Employment Opportunity Plan (if grantee is required to submit one under C.F.R. 42.302) that is approved by the Office of Justice Programs, Office of Civil Rights, is a violation of its assurances and may result in the suspension of the drawdown of funds. For grants under \$500,000, the grantee must submit a completed EEOP Certification form and return it to the Office of Justice Programs, Office of Civil Rights, within 120 days of the grant award.

**Rationale:**

The purpose of an Equal Employment Opportunity Plan (EEOP) is to ensure full and equal participation of men and women regardless of



race or national origin in the workforce of the recipient agency. EEOPs do not impose quotas or hiring requirements. The U.S. Department of Justice (DOJ) regulations regarding the requirements for an EEOP for Federal grant recipients and the required contents of the document are fully explained in 28 C.F.R. § 42.301 et seq.

**Action:**

U.S. DOJ regulations require you to prepare and maintain an EEOP if your organization:

- Has 50 or more employees; **and**
- Received a total of \$25,000 or more in grants or subgrants; **and**
- Has three percent or more minorities in its service population. Even if there is less than three percent minorities in the service population, the DOJ regulations require that the EEOP be written to focus on women.

If you meet the above criteria **and** receive over \$500,000 (or a total of \$1 million in grant funds during an 18-month period), you are required to submit an EEOP to:

**Office of Civil Rights  
Office of Justice Programs  
810 7th Street, NW  
Washington, D.C. 20531**

If you meet the above criteria, but your grant is for under \$500,000, or you have received less than \$1 million in grant funds during an 18-month period, you need to complete and return the one-page COPS EEOP Certification form within 120 days of your grant award to advise us whether you have an EEOP in effect or whether you are exempt from this requirement. If you need help preparing an EEOP, please consult the [Seven Step Guide to Preparing an EEOP](#) previously mailed to you or included in this mailing.

**13. EMPLOYMENT ELIGIBILITY**

The grantee agrees to complete and keep on file, as appropriate, an Immigration and Naturalization Service Employment Eligibility Verification Form (I-9). The form is to be used by recipients of Federal funds to verify that persons are eligible to work in the United States.

**Rationale:**

Under Federal immigration law, all employers are required to take certain steps to ensure that persons that are hired are legally permitted



to work in the United States. The Immigration and Naturalization Service Employment Eligibility Verification Form (I-9) outlines the types of documents that an employer should review to confirm that a new hire is eligible to be employed. The provisions of this law apply to employers regardless of whether or not they receive Federal grant funding.

**Action:**

You do not need to submit any documentation to the COPS Office to satisfy this condition. Rather, you should complete and maintain the I-9 forms for all new employees under the guidelines set forth by the Immigration and Naturalization Service. For information about this requirement, you may call 202-514-4316 or your local INS office.

COPS In Schools Training Condition

All agencies awarded under the COPS in Schools Grant Program will be required to attend one COPS in Schools Regional Training Workshop in order to satisfy this grant condition. The COPS Office will be the sole provider of this training. The COPS Office will deliver a series of approximately twenty (20) regionally based workshops.

This grant condition requires that the grantee send to the training the specific COPS in Schools officer(s) who will be deployed into the school(s) as a result of this grant. Please note that this may mean that a veteran locally-funded officer will attend this training, if you are deploying the veteran officer into the schools as a direct result of the grant and are using the COPS grant funds to hire a replacement officer to fill the resulting vacancy. This condition also requires that one school representative from the specific school(s) partner, who was designated in the original application, attend this training with the COPS in Schools officer(s). Unfortunately, at this time, only one representative from the school may attend this training. Therefore, it is very important that a representative with general educational oversight over this COPS in Schools program attend. The COPS Office reimburses participants up to \$1,100 for training, travel, lodging, and per diem for attendance of required participants. Additional information will be sent to grantees as soon as it is finalized.

In the award package is a copy of the COPS in Schools Additional Grant Condition for Training. This condition must be signed by both the law enforcement executive and the school representative and must be returned to the COPS Office with your signed Award Page.



### *How to Accept the Award*

After you have reviewed the conditions of the award and your agency agrees with those conditions, you are ready to accept the award. At the bottom of the Award Page are three signature lines. The Director of the COPS Office has signed the Award Page indicating approval of your grant, obligation of Federal funds to your organization and our commitment to the award. To officially begin the grant and to be able to draw down your funds, your **authorized officials** (the law enforcement and government executives) must sign the Award Page and return the **original** copy to:

**COPS in Schools Control Desk  
Office of Community Oriented Policing Services (COPS)  
8th floor  
1100 Vermont Avenue, NW  
Washington, DC 20530  
(For overnight delivery, please use 20005 as the zip code)**

We regret that Faxes cannot be accepted since we are required to have Original signatures in our files.

Who should sign the award for my agency?

The “authorized officials” are the individuals in the law enforcement and governmental organizations accepting this grant who have final responsibility for all programmatic and financial decisions of the organizations. In some jurisdictions, police chiefs and sheriffs have the authority to accept grant awards. In others, the government representative, mayor or county executive may have this authority. However, COPS grants require that both the law enforcement and government officials with such authority sign the Award Page. Before signing the grant, you should determine which individuals in your jurisdiction have the legal authority to accept the award. If you have any questions as to who should sign the award, please contact your city or county's legal advisor.

When do the grant materials need to be returned?

Please return the original signed Award Page within 90 days of your receipt of it. No funds may be released until we have received your signed Award Page, your budget has received final clearance, and any other relevant grant conditions particular to your agency have been satisfied. Failure to submit your signed award document in the 90-day award acceptance period could result in your grant being withdrawn and the money being deobligated without prior notification from the



COPS Office. If you require an extension for accepting the award beyond the 90-day timeframe for any reason, please submit a written request (including the anticipated date of award acceptance) to your Grant Program Specialist. The COPS Office will then review these requests on a case-by-case basis. COPS reserves the right to deny a request for extension.

Also included in the award package is a copy of the COPS in Schools Additional Grant Condition for Training. This condition must be signed by both the law enforcement executive and the school representative and must be returned to the COPS Office with your signed Award Page.

What are the specific rules regarding termination of grant funding?

The COPS Office has the right to sanction or to terminate your grant funding when you:

- Are not substantially complying with the requirements of the Act, the guidelines or with other provisions of Federal law;
- Are failing to make satisfactory progress toward the goals or strategies in your application and information, as reflected by performance and status reports;
- Do not adhere to grant agreement requirements or conditions;
- Propose substantial plan changes to the extent that, if originally submitted, would have resulted in the application not being selected for funding;
- Do not submit reports in a timely manner;
- File false certification in connection with an application, periodic report or other document submitted to the COPS Office or to COPS Accounting Operations; and/or
- Provide other good cause for termination.

In these instances, we may:

- Temporarily withhold payments pending correction of the situation by you;
- Disallow all or part of the cost of the activity or action not in compliance;
- Wholly or partly suspend or terminate your grant;
- Require that some or all of the grant amounts be remitted to the U.S. Department of Justice;
- Condition a future grant or elect not to provide future grant funds to you until appropriate actions are taken to ensure compliance;
- Withhold further awards for the program;
- Recommend civil or criminal enforcement by other agencies; or
- Take other remedies that may be legally available.



In the event that sanctions are imposed or a grant is terminated, you will be notified in writing of our decision, and the reason(s) for that decision.

Is a local cash match required?

The COPS in Schools program provides up to \$125,000 per officer for approved salary and benefit costs over the three-year grant period. Any additional amount of funding needed for salary and/or benefit costs exceeding \$125,000 per officer must be made through a local cash match. If matching contributions are made, they may be applied at any time during the life of your grant.

If local funds are to be contributed, they may come from the following sources (this list is not all inclusive):

- Program income funds from asset forfeitures;
- Funds from state or local units of government that are committed to matching funds for your program;
- Funds from Federal programs which specifically authorize use as matching funds such as the Housing and Community Development Act of 1974 or the Equitable Sharing Program; or
- Funds contributed by private sources.

Matching funds may not be taken from funds otherwise budgeted for law enforcement purposes. In other words, your local match may not be paid through any reallocation of already budgeted law enforcement funds.

Should I maintain records of the match?

If local funds are used to pay for any portion of the salaries and/or benefits for officers hired under COPS in Schools, then you must maintain records of your local share. These records should clearly show the source of the local match, the amount of the match, and when the match was contributed.

### ***Changes In Your Grant***

You must receive prior written approval if you plan to make the following grant changes (For additional guidance, please contact your Grant Program Specialist):

- Major programmatic changes, including the number of officers to be hired through your grant;
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- Significant changes in your community policing plan;
- Salary and benefit changes; and
- Changes to your retention plan.
- Changes in part-time or full-time employment.

In order to make one of these changes, you are required to submit your plans in writing to the COPS Office for prior approval. Please document your reasons for the proposed changes, how they will affect your programmatic activities, and add any other information that will assist us in reviewing the changes. All requests to make changes to your grant should be sent, in writing to your Grant Program Specialist.

### *Extending Your Grant*

No-cost time extensions will be given, if necessary, to grantees in order to complete grant requirements and draw down all grant funds. Extensions do not affect the amount of the grant, only the end date of the grant. If extensions to complete grant requirements are necessary, they may be requested not earlier than 90 days before the end of the grant period. The COPS Office will send information to you regarding the criteria and procedures for an extension before the end of the initial grant period.

### *Questions About Accepting the Grant*

If for any reason you have questions about accepting this grant, please call your Grant Program Specialist or contact the U.S. Department of Justice Response Center at 1-800-421-6770. If you have decided not to accept this grant, please send us a letter advising us of your decision.

If you are considering not accepting your COPS in Schools grant, we would be happy to assist you with any questions you may have.

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## *II. Accessing Grant Funds*

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This section provides information about how you receive funds and gives answers to payment-related questions. If you are a new COPS Office grantee, you should have received a packet of financial documents shortly after receipt of your award package. This packet contains all of the information needed to set up your payment method. A Financial Guide to assist you with financial management and grant administration will also be included. Currently, there are two methods of payment that you can use to access your grant funds: PAPRS (payment by phone) and LOCES (electronic payment).

The following explanations are to assist you in determining which payment method best suits your agency's needs in accessing your COPS grant funds.

### *Payment Methods*

There are currently two methods that you may use to access your grant funds:

#### *A. PAPRS (Phone Activated Paperless Request System)*

PAPRS enables grantees to use their touch-tone telephone to request funds. Approved payment requests will be automatically scheduled for payment by the U.S. Treasury. The system also provides online information to grantees about the status of their requests.

If you do not have a touch-tone telephone, please contact the U.S. Department of Justice Response Center at 1-800-421-6770. Original and reprint PAPRS packages are mailed by the OC Customer Service Center. If you need to request a reprinted PAPRS package, please contact them at 1-800-458-0786.

How do we set up a PAPRS account?

If you are a new grantee to the COPS Office, you should receive a packet of financial documents shortly after we receive your signed award document. This packet will contain all of the information that you need to set up your payment method. You will receive a PAPRS user's manual under separate cover from the Office of the Comptroller, Accounting Division. Once you receive your Office of Justice Programs Vendor Number (which may or may not be the same as your taxpayer identification number) and PIN number, you can follow the directions in the user's manual to access your funds.



***B. LOCES (Letter of Credit Electronic Certification System)***

For Previously awarded COPS grantees only

LOCES is a modem communication system that allows recipients of COPS funds to electronically request payment from any of their grant funds and receive direct deposit to their bank accounts within 48 hours. You will need a computer with a dedicated modem in order to use this system.

1. To make requests for payments through LOCES, you must have a personal computer operating DOS 3.1 or higher. We recommend at least a 28.8-band modem.
2. Complete and return the LOCES Automation Survey form. Upon receipt, your LOCES software will be customized for your use and forwarded to you.
3. Complete an ACH Vendor / Miscellaneous Payment (SF 3881) enrollment form and forward to your bank.

A complete LOCES form and manual package may be requested by contacting COPS Accounting Operations at 1-800-421-6770. In addition, Accounting Operations can provide technical assistance on using the LOCES system.

What are the benefits of LOCES?

The LOCES method is a completely computerized method of payment. It also allows you to file your quarterly Financial Status Reports (SF-269) electronically.

***Setting Up Your Account***

How do I fill out the payment enrollment forms?

In the packet of financial documents you received is an Automated Clearing House (ACH) Vendor / Miscellaneous Payment (SF 3881) enrollment form. The ACH Vendor / Miscellaneous Payment (SF 3881) enrollment form needs to be filled out regardless of the payment method selected. Prior to trying to access your funds, you must submit this form using the instructions provided by the Office of the Comptroller:



The “Agency Information” section has been filled out by our Accounting Operations. Your agency needs to fill out the “Payee / Company Information” section following the directions on the back of the form. Please also provide the grant number (printed on the Award Page) on this form. Have your financial institution complete the “Financial Institution Information” section and have the appropriate financial official sign the form.

If you are already a COPS Office grantee, you should already have selected one of the two payment methods and filled out an ACH Vendor / Miscellaneous Payment (SF 3881) enrollment form. If you have any questions, please call COPS Accounting Operations at 1-800-421-6770.

Do I need a Financial Status Report to open my account?

As part of Federal auditing requirements, your agency has to complete a Financial Status Report (Standard Form 269A) quarterly. Payment requests will be denied if the current SF 269A is overdue. Please make blank copies of the form (both sides) provided in your award packet and retain them for future use. This form is a report of your expenditures for the grant. The Financial Status Report is due 45 days following the end of a calendar quarter (calendar quarters end March 31, June 30, September 30, and December 31). Even when you have not expended any funds during a quarter, the Financial Status Report should be submitted with zeros in the appropriate spaces. When setting up your account, check to see when the last quarter ended and fill out a Financial Status Report to reflect the amount of your agency's expenditures for the grant during that quarter, and submit the form along with the ACH Vendor form. For the rest of the year, please submit Financial Status Reports no later than May 15, August 15, November 15, and February 15.

Completing the Financial Status Report does not mean that you will be reimbursed for the amount you show as being expended. You must still request payment through PAPRS or LOCES (see section on payment methods).

For more information, see the section of this Manual entitled “Reports.”



### ***Additional Payment Questions***

Can we receive advances?

Yes. If you receive funds through electronic transfer, the period allowed is ten (10) days in advance.

In general, the concept of “minimum cash on hand” applies to COPS grants. The minimum cash on hand concept requires that you request funds based upon immediate cash disbursement needs. You should time your request for payment to ensure that Federal cash on hand is the minimum that you need to make your immediate salary and fringe benefits payments. There should be no excess Federal grant funds on hand, except for approved advances discussed above.

The Federal government has four basic rules regarding advances. Advances can be terminated if the grantee:

- Is unwilling or unable to attain project goals;
- Maintains excess cash on hand;
- Does not adhere to the terms and conditions of the grant; or
- Fails to submit reliable and / or timely reports.

How often do we request reimbursement of costs?

There are no definitive guidelines on how often you should request reimbursements. Only reimbursements for actual salaries and benefits of officers hired under the COPS in Schools program can be made.

Can we earn interest on our grant funds?

You should minimize the time between your drawdown of grant funds and your payment of grant costs. You need to account for interest earned on advances of Federal funds as follows:

- You may keep interest earned on all advances of Federal grant funds up to \$250 per fiscal year; and
  - Annually pay back interest earned (over and above \$250 per fiscal year) on advances of Federal grant funds to the U.S. Department of Health and Human Services, Payment Management Systems, Rockville, MD 20852.
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### ***III. Financial Record Maintenance***

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Under your COPS in Schools grant, you are required to establish and maintain accounting systems and financial records to accurately account for funds awarded and disbursed. These records need to include both Federal funds and all matching funds, if any are provided, from state, local and private organizations.

#### ***Accounting Systems***

What accounting systems are needed?

You need to establish and maintain accounting systems and financial records to accurately account for funds awarded to you. These records should include both Federal funds and matching funds (if any) of state, local, and private organizations.

Your accounting system should:

- Present and itemize approved costs of salaries and benefits;
- Assure responsible use of grant funds;
- Assure that all expenditures of funds are in conformance with your grant conditions; and
- Be able to provide the necessary information for periodic financial review and audit.

What records should be kept?

Your fiscal control and accounting systems should enable you to make accurate, current and complete disclosure of the financial activity under your COPS in Schools grant. Your accounting records should contain information showing expenditures under the grant, and must be supported by items such as payroll, time and attendance records, canceled checks, or similar documents.

You must adequately safeguard grant funds and make sure that they are used for authorized purposes. You will be responsible for refunding expenditures disallowed by auditors.

How long should documents be kept?

All financial records, including payroll, time and attendance records, canceled checks and similar documents associated with your COPS in Schools grant should be kept for at least three years from the grant closing date. If any litigation, claim, negotiation, audit or other action involving these records has been started before the end of the three-



year period, the records should be kept until completion of the action. These records need to be easily located and properly protected against fire or other damage.

You should maintain your records so that you can identify them by grant year or by your fiscal year, whichever you find more convenient.

What if we have more than one grant?

If you have more than one Federal grant, funds received under one project may not be used to support another project without specific written authorization from the awarding agency. Your accounting systems and financial records must reflect expenditures for each project separately.

Who may access our records?

Authorized Federal representatives, including the representatives of the U.S. Department of Justice and the Comptroller General of the United States, may access these records as long as they exist for the purposes of making audits, examinations, excerpts or transcripts.



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## ***IV. Federal Audit Requirements***

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### ***Audit Requirements***

In addition to oversight, guidance and counsel provided by the COPS Office, your grant may be subject to an audit by independent examiners. The two primary types of audits are Single Audit Act (SAA) audits and Department of Justice (DOJ), Office of the Inspector General (OIG) audits. These audits are designed to determine whether you have systems in place, controls established, and reports providing reasonable assurance that your organization is managing the COPS in Schools funds in compliance with laws, regulations, and provisions specified in this manual. Failure to comply with audit requirements may result in adverse current and future funding determinations.

COPS established the Compliance Staff, under the direction of a Program Compliance Officer, in Fiscal Year 2000 to serve as the liaison between grantees and auditors in the conduct of audits. The Compliance Staff's liaison responsibilities include, but are not limited to, addressing grantee inquiries regarding audit processes; providing grantees with technical assistance in responding to audit reports; evaluating the accuracy of identified findings (problem areas) and recommendations to correct problem areas; facilitating closure on audit findings and recommendations; and tracking current, pending, and completed audit initiatives. The Compliance Staff may be contacted by telephone through the Department of Justice Response Center at 1-800-421-6770. *Compliance Staff members and the Program Compliance Officer are available to address questions and provide assistance regarding the SAA and OIG audit processes. Questions and comments regarding the administration of your grant(s), not specifically related to an audit, should be referred to your Grant Program Specialist.*

Who must have an audit?

**Audit requirements:** State and local governments, nonprofit organizations, and institutions of higher education receiving Federal funds are governed by OMB Circular A-133. Whether an audit is required under this circular is dependent upon the amount of Federal funds expended during the recipient's fiscal year. If the organization expends \$300,000 or more per year in Federal funds, the organization must have an audit conducted in accordance with OMB Circular A-133 audit requirements.



State and local governments, nonprofit organizations, and institutions of higher education expending less than \$300,000 a year in Federal awards are exempt from Federal audit requirements, but records must be available for review by appropriate officials of the Federal grantor agency or subgranting entity.

### ***Single Audit Act Audits***

What is a Single Audit Act audit?

A Single Audit Act (SAA) audit is an examination of a non-Federal entity's financial statements and Federal awards by public accountants or Federal, state, or local government audit organizations. The purpose of the SAA audit is to determine: 1) whether financial statements are presented fairly, in conformity with generally accepted accounting principles; 2) whether the schedule of expenditures of Federal awards is presented fairly in relation to the financial statements taken as a whole; 3) if internal controls are sufficient to minimize risk; and 4) compliance with laws, regulations, and grant provisions having a material effect on major programs.

What are the regulations governing SAA requirements?

The Single Audit Act was passed in 1984, and established uniform guidelines for state and local governments receiving Federal financial assistance. The 1984 Act was amended in July 1996 to reflect revised audit criteria and reporting requirements. The Office of Management and Budget Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, provides additional guidelines regarding the implementation of SAA requirements.

Who must have an SAA audit?

Each non-Federal entity that expends a total amount of Federal awards equal to or in excess of \$300,000 within a fiscal year shall have an SAA audit for that fiscal year.

A non-Federal entity that expends Federal awards under more than one Federal program shall undergo an SAA audit encompassing all operations; or, at the option of the non-Federal entity, the SAA audit may include a series of audits encompassing the organizational units which expended or administered grants during the fiscal year. If the latter alternative is selected, the SAA audit must include the financial statements and schedule of expenditures of Federal awards for each organizational unit encompassed in the audit.



When an entity expends Federal awards under only one Federal program and that Federal program's laws, regulations, and grant provisions do not require a financial statement for the Federal program, that organization may elect to have a program-specific audit conducted. Unlike an SAA audit, encompassing all of the entity's operations, the scope of a program-specific audit includes the financial, internal control, and compliance issues governing the program under review.

How frequently are SAA audits conducted?

SAA audits are conducted annually unless a state or local government is required by constitution or statute, in effect on January 1, 1987, to undergo audits less frequently than annually. If such constitution or statute does exist, the entity is permitted to undergo an audit biennially. Non-profit organizations that had biennial audits for all biennial periods ending between July 1, 1992 and January 1, 1995 are permitted to undergo biennial audits. All biennial audits must cover both years within the biennial period.

What are the primary steps included in the SAA audit process?

The auditor retained by your organization should conduct testing to determine whether the financial statement and schedule of expenditures of Federal awards are presented fairly, in all material respects. The auditor will also conduct internal control and compliance testing to determine adherence to laws, regulations, and grant provisions as well as adequate protection of resources from fraud, waste, and abuse. Once testing is completed, the auditor will issue a report reflecting the results of financial statement, internal control, and compliance testing, which includes findings and recommendations for areas deemed non-compliant and/or vulnerable. Upon receiving the auditor's report, your organization should prepare a corrective action plan for each finding and recommendation. The corrective action plan needs to reflect agreement or disagreement with the findings and recommendations, information to support a position of disagreement, and both completed and anticipated actions to address the findings and recommendations.

You must submit the auditor's report and corrective action plan to the Federal Clearinghouse within the earlier of 30 days after receiving the auditor's report or nine months after the end of the audit period. The Federal Clearinghouse (the address is on Page 6) is a central repository for all SAA audits, and is responsible for tracking the submission of SAA audit reports and distributing such reports to appropriate parties. If the report contains findings and recommendations applicable to DOJ operations, the Federal Clearinghouse distributes the reporting



package to DOJ's Office of the Inspector General (OIG). The OIG evaluates the audit findings and recommendations and distributes the report to DOJ's Office of Justice Programs for audit follow-up. If an audit discloses findings and recommendations directly related to the administration of COPS grants, OJP provides COPS' Compliance Staff with a copy of the audit report to facilitate resolution and closure. *Serving in this capacity, COPS' Compliance Staff serves as the liaison among the SAA auditor, OIG, OJP, and your office and provides technical assistance with respect to audit follow-up initiatives, including requests for updated corrective action plans. Questions and comments regarding the administration of your grant(s), unrelated to an OIG or SAA audit, should be referred to your Grant Program Specialist or Financial Analyst, rather than the Compliance Staff.*

### ***Office of the Inspector General Audits***

What is the role of the Office of the Inspector General (OIG)?

The OIG is an independent agency within DOJ authorized to conduct audits related to DOJ programmatic, financial, and administrative operations. OIG audits are designed to promote economy, efficiency, and effectiveness in the administration of grants by evaluating compliance with laws, regulations, and policies and procedures governing the operations encompassed in the scope of the audit.

On what basis are COPS grants selected for an OIG audit?

Occasionally, the OIG conducts a COPS grant audit in response to a referral that the OIG believes warrants further evaluation. The OIG also surveys DOJ agencies on an annual basis to solicit input on suggested audit areas for the upcoming fiscal year. In most instances, however, the OIG selects grants taking into consideration many factors including, but not limited to, geographical distribution of grants awarded, award amount, population served, and type of grant. *As such, the fact that your grant has been selected for an OIG audit is not necessarily indicative of a suspected concern or problem area; but, instead, is typically part of the overall selection process.*

What is encompassed in the scope of an OIG audit?

Typically, OIG audits encompass all grants awarded to your agency, both active and expired. The OIG conducts testing to determine compliance with programmatic, administrative, and financial requirements for each of the grants selected. Compliance areas may include, but are not be limited to, supplanting, retention, allowable costs, local match, redeployment, financial and programmatic



reporting, and community policing grant provisions. Once testing is completed, the OIG issues a report that includes an analysis of areas deemed non-compliant and recommendations to correct problem areas. The OIG's recommendations may include returning a portion or all of your grant funding. As such, it is imperative that you remain aware of and comply with grant provisions, implement effective accounting systems, and maintain detailed, accurate records supporting the administration of your grant(s).

How will I be notified of an upcoming OIG audit? What will I need to do to prepare?

Typically, the OIG will notify the COPS Office of upcoming audits, at which time COPS will send you a notification letter indicating both a COPS point of contact to address your questions and comments, and a description of the information/documentation that will need to be made available to the OIG during their scheduled on-site visit. If the OIG notifies you of their upcoming audit prior to your receiving notification from the COPS Office, please feel free to call the COPS Compliance Staff to discuss questions and comments regarding the audit process.

After COPS issues a notification letter to your organization, the OIG will issue a similar letter specifying the information that will be needed and a scheduled date for the introductory entrance conference. At this point, you will work with both the OIG and COPS to further the audit process.

What are the primary steps included in the OIG audit process?

After an entrance conference is conducted between your organization and the OIG, the auditors will conduct analysis and inquiries regarding the administration of your grant(s). Based on the information/documentation obtained and response to inquiries, OIG may identify potential/actual vulnerabilities and/or areas deemed non-compliant with grant provisions, which collectively are referred to as "findings." The OIG will state their findings and recommendations in a draft audit report, which will be furnished to your office and the COPS Office for review and comment. The response to the draft audit report provides both you and COPS an opportunity to indicate concurrence or non-concurrence with the OIG's findings and recommendations, and what, if any, action has been or will be taken to address the findings and recommendations. Upon receiving your response and COPS' response to the draft audit report, the OIG will issue a final report identifying whether each recommendation is "open," meaning additional action is needed to address the finding



and recommendation, or “closed,” meaning all actions necessary to address the OIG’s finding and recommendation have been fully implemented.

After the final report has been issued, the COPS Compliance Staff will continue working as the liaison between your office and the OIG to close the open audit findings and recommendations. Serving in this capacity, COPS will advise you as to what information/documentation is needed to attain closure on the open audit recommendations, evaluate your information for accuracy and completeness, and furnish the information to the OIG to facilitate closure. This process continues until all audit recommendations are closed, at which time you will be issued a letter confirming closure of the entire audit. You must keep all documentation related to the audit for a period of three years after the audit closure date. If an investigation or official inquiry occurs either during the audit period or within three years of the audit closure date, you must keep all audit records until the investigation or inquiry has been completed.



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## ***V. Reports***

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Periodically, you will be asked to provide four types of reports: 1) Program Progress Reports; 2) Quarterly Financial Status Reports; 3) Cash Reconciliation Reports; and 4) telephone surveys about hiring. In addition, a baseline survey of current community policing activities was conducted at the beginning of the grant period, through the Community Policing Information Worksheet. Payments for your current grants and future awards may be withheld if reports are not returned or are excessively late.

### ***Program Progress Reports***

How often will progress reports be requested?

Program progress reports will be requested once a year throughout the life of the grant. The report will be mailed out in January of each year, and must be completed and returned to the COPS Office within 45 days.

What kind of information will be requested?

The progress reports will request information about the status of your grant in terms of selection, hiring, and training; characteristics of the officers you have hired; descriptions of officer activities; and general information about your department. Additional information will be requested concerning the school-related activities of the officers deployed into school(s) as a result of your COPS in Schools award.

How and when will these forms be sent?

These reports and instructions will be mailed to you every January during the course of your grant period. You may also receive periodic phone calls from your Grant Program Specialist regarding the status of your grant. In addition, a COPS Office representative may also make a site visit to your agency during the grant period.

### ***Financial Status Reports***

How will grant funds be monitored?

COPS Accounting Operations monitors the financial aspects of your grant through financial reports, meetings, telephone contacts, reports, audits, reviews of grant change requests and special request submissions. In specific cases, information may be requested during an on-site visit.

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How do I file Financial Status Reports under PAPRS?

Under the COPS PAPRS system, you are required to complete and return quarterly Financial Status Reports (SF-269A) within 45 days after the end of the calendar quarter. The Financial Status Reports request information on your monies spent, including amounts for Federal expenditures, local matching contributions, and the unobligated balance of the award. Please make blank copies of the form (both sides) provided in your award package and retain them for future use.

**You will be unable to access funds in the PAPRS system if you have not submitted these Financial Status Reports or your signed Award Page.**

How do I file financial status reports under LOCES?

Under the LOCES payment method, you are required to complete and return quarterly Financial Status Reports (SF-269A) within 45 days after the end of the calendar quarter. You have the option of completing those reports electronically.

### *Cash Reconciliation Reports*

COPS Accounting Operations will send you a Cash Reconciliation report on a semiannual basis. This report includes all cash activity related to your award during the period. Please verify the accuracy of that report. No response is necessary if the information reflected in the report is in agreement with your records. If the information differs from your records, please notify COPS Accounting Operations in writing outlining the identified differences.

### *Telephone Calls About Hiring*

How often will calls be made?

The COPS Office will contact your agency up to two times per year to determine your grant progress and the number of officers hired and deployed into schools to date.

What will be asked during the telephone contact?

The COPS Office will ask for the number of officers hired and deployed, the average number of hours per week each deployed officer spends in and around the school(s), and a timetable for when future hiring may occur, if it has not occurred already.



### ***How to Report Violations (Fraud, Waste and Abuse)***

Any alleged violations, serious irregularities, or acts that may result in the use of public funds in a manner inconsistent with the Public Safety Partnership and Community Policing Act of 1994 or the purposes of this grant, please report such to the U.S. Department of Justice Inspector General Hotline at 1-800-869-4499. We would greatly appreciate your cooperation to help us ensure that these Federal grant funds are spent responsibly.





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## ***VI. When the Grant Period Has Ended***

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### ***Grant "Close Out"***

At the end of your grant period, the COPS Office is responsible for the "close out" of your grant. To fulfill this requirement, we must determine that you, as well as the COPS Office, have completed all of the work required by the grant.

Normally within 120 days of the end of the grant period, you will be asked to submit final financial and program reports. These reports will be very similar to the reports discussed in Section V.

#### Financial Status Report

The final Financial Status Report (SF 269A) of your grant expenditures is due within 120 days after the end of the grant period. [Example: If the award period is 6/1/2000 to 5/31/2003, the final report is due by 9/30/2003.] This final report should reflect the total amount of Federal expenditures, the total amount of matching contributions (if any were made), and the amount of unobligated funds, if any. Any unobligated or unspent funds will be deobligated from the award amount.

When should all of the grant monies be spent?

Grant funds must be obligated by the end of the grant period. Obligated funds cover expenses for salary and approved benefits that you have incurred but not yet paid. You have 120 days after the end of the grant period to expend grant funds that have been obligated. Any grant funds that you do not request payment for at the end of the 120 days will revert to the COPS Office.

#### Final progress report

Normally within 120 days of the end of your grant award period, the COPS Office will ask you to submit a final program progress report. The final progress report with instructions will be mailed to you, and will request information similar to previous program progress reports.

### ***Conclusion***

We hope that this Manual has assisted you with your grant questions. We welcome and encourage any comments you have regarding COPS in Schools and the materials that we have developed for its administration. If you have specific comments regarding this Manual,



please send them to:

**COPS in Schools Grant Owner's Manual**  
**1100 Vermont Avenue, NW**  
**8th floor**  
**Washington, DC 20530**  
**(For overnight delivery, please use 20005 as the zip code)**

We will review these comments and make revisions as appropriate.

If you have any questions about your grant, please call the Department of Justice Response Center at 1-800-421-6770 or your Grant Program Specialist.

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## *VII. Appendices*

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### *Appendix A*

#### *List of Source Documents*

##### **Primary Sources:**

Public Safety Partnership and Community Policing Act of 1994, 42 U.S.C.

U.S. Department of Justice, Office of Justice Programs, Financial and Administrative Guide for Grants, OJP M 7100.1D: May 15, 1990

##### **Additional Sources:**

Code of Federal Regulations (CFR)

28 CFR Part 66 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments

28 CFR Part 67 Government wide Requirements for Drug-Free Workplaces (Grants)

28 CFR Part 69 Government wide New Restrictions on Lobbying

31 CFR Part 205 Treasury Department Regulations Implementing for Cash Management Improvement Act of 1990

OMB Circular A-87 Cost Principles for State and Local Governments

OMB Circular A-33 Audits of Educational Institutions

Assurances for Universal Hiring (Included)

Executive Order 12547 “Non-Procurement Debarments and Suspension”

Executive Order 12372, 28 CFR, Part 30 “Intergovernmental Review of Federal Programs”

OMB Circular A-129 Managing Federal Credit Programs

4 CFR Parts 101-105 Department of Justice/General Accounting Office, “Joint Federal Claims Collections Standards”

5 CFR Part 1320 “Controlling the Paperwork Burden on the Public”

Executive Order 12291 “Regulations”

5 CFR Part 151 “Political Activities of State and Local Officials or Employees”

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## Appendix C - Certifications

### Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters; Drug-Free Workplace Requirements Coordination with Affected Agencies; Non-Supplanting; and Retention.

Although the Department of Justice has made every effort to simplify the application process, other provisions of Federal law require us to seek your certification regarding certain matters. Applicants should read the regulations cited below and the instructions for certification included in the regulations to understand the requirements and whether they apply to a particular applicant. Signature of this form provides for compliance with certification requirements under 28 CFR Part 69, “New Restrictions on Lobbying,” and 28 CFR Part 67, “Government-wide Debarment and Suspension (Nonprocurement) and Government-wide Requirements for Drug-Free Workplace (Grants),” and the coordination and non-supplanting requirements of the Public Safety Partnership and Community Policing Act of 1994. The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Justice determines to award the covered grant.

#### 1. Lobbying

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 28 CFR Part 69, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 28 CFR Part 69, the applicant certifies that:

A. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant; the entering into of any cooperative agreement; and the extension, continuation, renewal, amendment or modification of any Federal grant or cooperative agreement;

B. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form — LLL, “Disclosure of Lobbying Activities,” in accordance with its instructions;

C. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all sub-recipients shall certify and disclose accordingly.

#### 2. Debarment, Suspension and Other Responsibility Matters (Direct Recipient)

As required by Executive Order 12549, Debarment and Suspension, and implemented at 28 CFR Part 67, for prospective participants in primary covered transactions, as defined at 28 CFR Part 67, Section 67.510 —

A. The applicant certifies that it and its principals:

(i) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of Federal benefits by a state or Federal court, or voluntarily excluded from

covered transactions by any Federal department or agency;

(ii) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing public (Federal, state or local) transaction or contract under a public transaction; violation of Federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(iii) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, state or local) with commission of any of the offenses enumerated in paragraph (A)(ii) of this certification; and

(iv) Have not within a three-year period preceding this application had one or more public transactions (Federal, state or local) terminated for cause or default; and

B. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

#### 3. Drug-Free Workplace (Grantees Other Than Individuals)

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 67, Subpart F, for grantees, as defined at 28 CFR Part 67, Sections 67.615 and 67.620 —

A. The applicant certifies that it will, or will continue to, provide a drug-free workplace by:

(i) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(ii) Establishing an on-going drug-free awareness program to inform employees about —

(a) The dangers of drug abuse in the workplace;

(b) The grantee's policy of maintaining a drug-free workplace;

(c) Any available drug counseling, rehabilitation and employee assistance programs; and

(d) The penalties that may be imposed upon employees for drug-abuse violations occurring in the workplace;



- (iii) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (i);
- (iv) Notifying the employee in the statement required by paragraph (i) that, as a condition of employment under the grant, the employee will —
  - (a) Abide by the terms of the statement; and
  - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (v) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (iv)(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to: COPS Office, 1100 Vermont Ave., NW, Washington, DC 20530. Notice shall include the identification number(s) of each affected grant;
- (vi) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (iv)(b), with respect to any employee who is so convicted —
  - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, state or local health, law enforcement or other appropriate agency;
- (vii) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (i), (ii), (iii), (iv), (v) and (vi).

B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of performance (street address, city, county, state, zip code)  
\_\_\_\_\_  
\_\_\_\_\_

Check r if there are workplaces on file that are not identified here.  
Section 67.630 of the regulations provides that a grantee that is a state may elect to make one certification in each Federal fiscal year, a copy of which should be included with each application for Department of Justice funding. States and state agencies may elect to use OJP Form 4061/7.  
Check r if the state has elected to complete OJP Form 4061/7.

4. Coordination

The Public Safety Partnership and Community Policing Act of 1994 requires applicants to certify that there has been appropriate coordination with all agencies that may be affected by the applicant's grant proposal if approved. Affected agencies may include, among others, the Office of the United States Attorney, state or local prosecutors, or correctional agencies. The applicant certifies that there has been appropriate coordination with all affected agencies.

5. Non-Supplanting

The applicant hereby certifies that Federal funds will not be used to replace or supplant state or local funds, or funds supplied by the Bureau of Indian Affairs, that would, in the absence of Federal aid, be made available to or for law enforcement purposes.

6. Retention

The applicant hereby certifies that it understands that it must abide by its submitted plan to retain the additional civilian positions and redeployment levels at the conclusion of the grant period.

Grantee Name and Address:

Application No. and/or Project Name: \_\_\_\_\_ Grantee IRS/ Vendor Number: \_\_\_\_\_

Typed Name and Title of Law Enforcement Representative: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

As the duly authorized representative of the governing body, I hereby certify that the I am binding the governing body to the above certifications, including the plan to retain. Elections of new officials will not relieve the governing body of its obligations under this grant.

Typed Name and Title of Government Representative: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



### Appendix B - Assurances

Several provisions of Federal law and policy apply to all grant programs. We (the Office of Community Oriented Policing Services) need to secure your assurance that you (the applicant) will comply with these provisions. If you would like further information about any of the matters on which we seek your assurance, please contact us.

By your authorized representative's signature, you assure us and certify to us that you will comply with all legal and administrative requirements that govern the applicant for acceptance and use of Federal grant funds. In particular, you assure us that:

1. You have been legally and officially authorized by the appropriate governing body (for example, mayor or city council) to apply for this grant and that the persons signing the application and these assurances on your behalf are authorized to do so and to act on your behalf with respect to any issues that may arise during processing of this application.
2. You will comply with the provisions of Federal law which limit certain political activities of your employees whose principal employment is in connection with an activity financed in whole or in part with this grant. These restrictions are set forth in 5 U.S.C. § 1501, et seq.
3. You will comply with the minimum wage and maximum hours provisions of the Federal Fair Labor Standards Act, if they apply to you.
4. You will establish safeguards, if you have not done so already, to prohibit employees from using their positions for a purpose that is, or gives the appearance of being, motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business or other ties.
5. You will give the Department of Justice or the Comptroller General access to and the right to examine records and documents related to the grant.
6. You will comply with all requirements imposed by the Department of Justice as a condition or administrative requirement of the grant; with the program guidelines; with the requirements of OMB Circulars A-87 (governing cost calculations) and A-128 or A-133 (governing audits); with the applicable provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended; with 28 CFR Part 66 (Uniform Administrative Requirements); with the provisions of the current edition of the appropriate COPS grant owner's manual; and with all other applicable laws, orders, regulations or circulars.
7. You will, to the extent practicable and consistent with applicable law, seek, recruit and hire qualified members of racial and ethnic minority groups and qualified women in order to further effective law enforcement by increasing their ranks within the sworn positions in your agency.
8. You will not, on the ground of race, color, religion, national origin, gender, disability or age, unlawfully exclude any person

from participation in, deny the benefits of or employment to any person, or subject any person to discrimination in connection with any programs or activities funded in whole or in part with Federal funds. These civil rights requirements are found in the non-discrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968, as amended (42 U.S.C. § 3789(d)); Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000d); the Indian Civil Rights Act (25 U.S.C. §§ 1301-1303); Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794); Title II, Subtitle A of the Americans with Disabilities Act (ADA) (42 U.S.C. § 12101, et seq.); the Age Discrimination Act of 1975 (42 U.S.C. § 6101, et seq.); and Department of Justice Non-Discrimination Regulations contained in Title 28, Parts 35 and 42 (subparts C, D, E and G) of the Code of Federal Regulations.

A. In the event that any court or administrative agency makes a finding of discrimination on grounds of race, color, religion, national origin, gender, disability or age against you after a due process hearing, you agree to forward a copy of the finding to the Office of Civil Rights, Office of Justice Programs, 810 7th Street, NW, Washington, DC 20531.

B. If you are applying for a grant of \$500,000 or more and Department regulations (28 CFR 42.301 et seq.) require you to submit an Equal Opportunity Employment Plan, you will do so at the time of this application, if you have not done so in the past. If you are applying for a grant of less than \$500,000 and the regulations require you to maintain a Plan on file in your office, you will do so within 120 days of your grant award.9. You will insure that the facilities under your ownership, lease or supervision which shall be utilized in the accomplishment of the project are not listed on the Environmental Protection Agency's (EPA) list of Violating Facilities and that you will notify us if you are advised by the EPA indicating that a facility to be used in this grant is under consideration for listing by EPA.

10. If your state has established a review and comment procedure under Executive Order 12372 and has selected this program for review, you have made this application available for review by the state Single Point of Contact.

11. You will devise a plan to retain the increased hiring level with state and local funds after the conclusion of your grant.

I hereby certify compliance with the above assurances that govern the application and use of Federal funds.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



FOR MORE INFORMATION:

U.S. Department of Justice  
Office of Community Oriented Policing Services  
1100 Vermont Avenue, NW  
Washington, D.C. 20530

To obtain details on COPS program, call the  
U.S. Department of Justice Response Center at 1.800.421.6770

Visit the COPS internet web site by the address listed below.

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