



COPS

Grants Management Training

Staying in Grant Compliance

COPS Grant Monitoring Division



Types of Monitoring Activities



Grant Monitoring Division



Monitoring Activities

- Site Visits
- Office-Based Grant Reviews (OBGRs)
- Alleged Non-compliance Reviews (ANCR)



Grant Monitoring Division



- Site Visits
 - Pre-Site
 - On-Site
 - Post-Site



Grant Monitoring Division



■ Pre-Site

- Contact with Grantee: Notification by telephone three to four weeks prior to the site visit.
- Notification Letter and Agenda: Grantee will receive written notification of the site visit and proposed agenda via Facsimile and U.S. Mail. This information will list the date and time of the review, grants to be reviewed, and the documentation and/or resources that should be available for the review.
- Internal Review: Grant Monitoring Specialist prepares by reviewing available internal sources of information, which may include grant files, progress reports, and financial databases.



Grant Monitoring Division



On-Site

- Entrance Interview
- Program / Financial Review
- Provide Technical Assistance
- Review the Grantee's Community Policing Efforts
- Tour of Community Policing Target Areas
- Exit Interview



Grant Monitoring Division



■ Post-Site

- Site Visit Report: Internal report documenting the events and findings from the site visit.
- Feedback Letter: Receive the findings/results within 45 calendar days from the date of the site visit.
- Administrative Follow Up: If necessary, any additional questions or administrative issues or concerns will be addressed.
- Compliance Resolution: If necessary, any compliance findings will be addressed and resolved.



Grant Monitoring Division



Office Based Grant Reviews (OBGRs)

- In-House Reviews: Provides the COPS Office with an opportunity to review a greater population of grantees without traveling to the agency. OBGRs are supplemented by direct contact with the grantee and collection of additional supporting documentation to determine the agency's compliance with the grant requirements.
- Request for Documentation: Grantees will be notified by telephone and sent an OBGR Notification letter requesting the necessary information to perform the review.
- Analysis: Grant Monitoring Specialist reviews available internal sources and grantee submitted documentation.
- Feedback Letter: Receive findings after completion of the review.



Grant Monitoring Division



■ Alleged Noncompliance Review (ANCR)

- Review internal and external allegations of noncompliance.
- Each ANCR is handled on a case by case basis, and the COPS Office determines the appropriate course of action to resolve the issue. This may include the following: written correspondence and phone contact, possibly a site visit by the Monitoring Division or a referral to the Office of Inspector General (OIG) or the Office of Justice Programs-Office of the Comptroller.



Where to Find Your Grant Conditions



- COPS grant conditions are printed on the back of each grant award document.
- A Grant Owner's Manual is included with each COPS grant award. This document lists and explains each program's grant conditions in detail.
- A current Grant Owner's Manual for most COPS grant programs can be found online at www.cops.usdoj.gov.



Program Compliance

- Areas of Compliance and Helpful Hints
 - Nonsupplanting
 - Retention
 - Allowable / Unallowable Costs
 - Unsupported Costs
 - Local Match
 - Reporting (Program / Financial)
 - Training Special Conditions
 - Community Policing



Nonsupplanting

- COPS funds must be used for personnel, equipment and technology, or other approved grant costs, over and above what the awardee's budget otherwise funded or would have funded for such costs with state, local, or BIA funds in the absence of COPS funding.



Nonsupplanting

- **Keys to avoiding a supplanting violation:**

- 1) Hire or purchase only new, additional personnel, equipment/technology, and/or other approved costs.
- 2) Pay only for personnel hired, equipment purchased, and/or other approved costs incurred on or after the award start date.
- 3) Make sure the grant-funded purchases or hires are over and above the number of positions, equipment/technology, and/or other approved costs that otherwise would have been funded by the grantee in the absence of the COPS grant.



Retention

- Grant requirement: COPS-funded officer positions must be retained for a minimum of one full local budget cycle, over and above the number of locally-funded officer positions that the grantee otherwise would fund with state, local, or BIA funds.



Allowable Costs

Allowable costs are those costs that are reimbursable by the COPS Office, as specified by the provisions/requirements of the grant. The provisions/requirements include: the approved budget, the financial clearance memorandum, and the Grant Owner's Manual (if applicable), which are included in the grant award package; the COPS Office authorizing statute; and applicable rules, regulations and policies issued by the federal government. The financial clearance memorandum limits the amount that may be charged for each category. However, the COPS Office reserves the ability to reprogram the grantee budget upon request. The costs should be reasonable in nature and permissible under the specific grant conditions.



Allowable Costs

- Compliance will be verified through an evaluation of the documentation that costs are consistent with the grant award package. Documentation may include, but is not limited to, budgets, payroll records, meeting minutes, purchase orders, and invoices.
- If your agency needs to make changes to the grant, a grant modification request should be submitted to the COPS Office through your Grant Program Specialist. Written approval of the modification should be maintained as part of the grant records.



Unsupported Costs

- Documentation is required to establish and maintain accounting systems and financial records to accurately account for funds awarded and disbursed. These records need to include both COPS Federal funds and when applicable, all matching funds. 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, receipts, invoices, or similar documents.



Local Match

- Local matching funds may *not* come from funds already budgeted for law enforcement purposes (i.e., they must be above and beyond previously budgeted funds).
- Local match must be paid during the grant award period.
- For three-year hiring grants, local match must increase during the grant period as the federal share of funding decreases.
- Grantees must maintain records that show the local match:
 - Source - From state, local, or BIA funds
 - Amount - As required by the grant terms and by statute
 - Timing - When budgeted and paid



Reporting

- Financial Status Reports (SF-269A): due quarterly
- Program Progress Report -- OR --
Department Annual Progress Report
- Closeout Report



Financial Compliance

- **DEFINITION:** The Financial Status Report (SF-269A) is a required report for all COPS grantees that is completed and submitted to the COPS Office on a quarterly basis. This report requests information on total monies spent, the breakdown by federal expenditure and local match, and unobligated amounts.

The SF-269A is due at the COPS Office no later than 45 days following each calendar quarter (see below). Grantees who do not submit SF-269As by the due date will be unable to draw down funds.

<u>Reporting Quarter</u>	<u>Date Due</u>
1/1 - 3/31	5/15
4/1 - 6/30	8/14
7/1 - 9/30	11/14
10/1 - 12/31	2/14



Financial Compliance

- The COPS Office monitors the timely and accurate submission of Financial Status Reports and will assist in completing much of the standard information; however, the grantee must provide specific financial information. Payments to grantees are delayed if the most current Financial Status Report has not been submitted at the time of the payment request.
- If you have questions or need assistance in completing the Financial Status Report, please contact your COPS Accountant at (800) 421-6770.



Training Special Condition



- **DEFINITION:** All COPS in Schools awards contain an additional grant condition that requires the officers deployed into the schools as a result of the CIS grant and one designated school administrator per grant to attend COPS-sponsored School Resource Officer (SRO) Training. Applicants to the CIS program are required to agree to this condition at the time of application submission. Departments are encouraged to attend the training in the early stages of the grant, but, in all cases, departments must complete their training during the life of the grant. Under the actual grant condition, the SRO(s) deployed to work in the schools as a result of the grant and one school administrator, representing the lead partnering agency, are required to attend this team-based training.
- **COMPLIANCE:** The COPS Office will verify compliance through documentation demonstrating that the training was completed before the grant period ended.



Community Policing

- **DEFINITION:** Community policing is a philosophy that promotes and supports organizational strategies to address the causes and reduce the fear of crime and social disorder. Agencies are expected to implement or enhance community policing strategies illustrating community partnerships, problem solving, and organizational commitment.



Community Policing

- At the time of application, grantees are required to submit a community policing plan describing the community policing activities that will be executed by the local law enforcement agency. Grantees are not required to implement every community policing activity identified on the approved plan to demonstrate compliance. Instead, the plan may often identify a broad range of possible community policing activities, with the grantee implementing specific community policing strategies from the approved plan on an as-needed basis throughout the life of the grant. Any significant changes to the community policing plan identified in the grant application must be submitted in writing to the COPS Office. Changes are “significant” if they deviate from the range of possible community policing activities identified and approved in the grantee’s original community policing plan.



Record Management

- Suggested documentation to maintain for each COPS grant file may include:
 - Administrative: Copies of grant application, grant award, financial clearance memorandum, programmatic progress reports, and grant correspondence.
 - Financial: Purchase orders and receipts, bid requests, payroll records, time and attendance, staffing levels, and financial status reports (SF-269a).



Contact Information



Monitoring Contacts, Grant Monitoring Division

- * Marvin Ng, (202) 514-6041
- * Jack Roberts, (202) 514-8307
- * George Gibmeyer, (202) 305-2564

Alleged Non-compliance Review Desk (ANCR) – submit in writing to:
COPS Office
1100 Vermont Ave, NW
Washington, DC 20530
Attention: ANCR Desk, 9th Floor



Helpful Resources

- COPS website: www.cops.usdoj.gov
- *Grant Monitoring Standards and Guidelines for Hiring and Redeployment* (available on COPS website)
- Program-specific Grant Owner's Manual
- COPS Response Center: (800) 421-6770
- *Helpful Hints for Completing an SF-269A* (available on COPS website)
- Your Grant Program Specialist can be reached at (800) 421-6770.