



COPS

*COMMUNITY ORIENTED POLICING SERVICES
U.S. DEPARTMENT OF JUSTICE*

Grant Monitoring Standards and Guidelines for Hiring and Redeployment







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Grant Monitoring Standards and Guidelines for Hiring and Redeployment

I. Purpose of the Monitoring Standards Guides



I. Purpose of the Monitoring Standards Guides

The purpose of the Monitoring Standards and Guidelines is to provide assistance with the administration, monitoring, and auditing of the Office of Community Oriented Policing Services (COPS) grant performance and compliance requirements. These activities help determine whether COPS grantees are complying with their Hiring which includes; Police Hiring Supplement (PHS), Phase I, Accelerated Hiring, Education and Deployment (AHEAD), Funding Accelerated for Smaller Towns (FAST), Universal Hiring Programs (UHP) and COPS in Schools (CIS) as well as Making Officer Redeployment Effective (MORE) grant terms and conditions. The eight compliance categories representing the terms and conditions for Hiring and MORE grants are: community policing; retention; allowable costs; source and amount of matching funds; supplanting; training special condition for CIS grantees, reporting and timesavings for redeployment.

This Monitoring Standards Guide provides two major functions for the Hiring and MORE grant programs. First, it provides a definition of each of the eight primary compliance categories, as well as the related specific terms and conditions required to comply with the COPS Hiring which also includes; Police Hiring Supplement (PHS), Phase I, Accelerated Hiring, Education and Deployment (AHEAD), Funding Accelerated for Smaller Towns (FAST), Universal Hiring Programs (UHP) and COPS in Schools (CIS) and Making Officer Redeployment Effective (MORE) grant programs. Second, it provides a list of performance standards and indicators for each category, which can be used to help determine whether grantees are meeting the COPS grant program requirements. Also included in the beginning of this guide is a summary of the covered COPS grant programs and an explanation of the COPS Office's monitoring and auditing activities that grantees may expect upon grant award.

Grantees seeking additional information regarding any of these requirements may contact their Grant Program Specialist through the COPS Office Response Center at 800.421.6770 or through e-mail at askCOPSRC@usdoj.gov.

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

II. Purpose of the COPS Grant Programs

II. Purpose of the COPS Grant Programs

The Office of Community Oriented Policing Services (COPS) was created as a result of the Violent Crime Control and Law Enforcement Act of 1994. As a component of the U.S. Department of Justice, the COPS Office has the unique mission to directly serve the needs of state and local law enforcement in their efforts to address local crime and disorder through the use of proven community policing strategies. The COPS Office has been the driving force in advancing community policing, and is responsible for one of the greatest infusions of resources into state and local law enforcement in our nation's history.

Since 1994, COPS has invested over 10 billion of dollars to add community policing officers to the nation's streets, enhance crime fighting technology, support crime prevention initiatives, and provide training and technical assistance to help advance community policing. COPS funding has furthered the advancement of community policing through community policing innovation conferences, the development of best practices, pilot community policing programs, and applied research and evaluation initiatives. COPS has also positioned itself to respond directly to emerging law enforcement needs. Examples include working in partnership with departments to enhance police integrity, promoting safe schools, and combating the methamphetamine drug problem.

The COPS Office has made substantial investments in law enforcement training. COPS created a national network of Regional Community Policing Institutes that are available to state and local law enforcement, elected officials and community leaders for training opportunities on a wide range of community policing topics. COPS also supports the advancement of community policing strategies through the Community Policing Consortium. Additionally, COPS has made a major investment in applied research which makes possible the growing body of substantive knowledge covering all aspects of community policing.

These substantial investments have produced a significant national community policing infrastructure, as evidenced by the fact that at the present time, approximately 86% of the nation's population is served by law enforcement agencies practicing community policing. The COPS Office continues to respond proactively by providing critical resources, training, and technical assistance to help state and local law enforcement implement innovative and effective community policing strategies.



At the end of fiscal year 2003, the COPS Office had funded 118,500 additional officers to over 13,000 of the nation's 18,000 law enforcement agencies across the country in both small and large jurisdictions.

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

III. Types of Grants

III. Types of Grants

Two of the main categories of grants offered under the COPS Program are Hiring and MORE. Of the Hiring grants, six major types were implemented at different stages of the COPS Grants Program. (Other Hiring and Innovative Grants are not specifically addressed in this manual.) Below is a list identifying those COPS grant programs:

- Police Hiring Supplement (PHS)
- Phase I
- Accelerated Hiring, Education, And Deployment (AHEAD)
- Funding Accelerated for Smaller Towns (FAST)
- Universal Hiring Program (UHP)
- COPS in Schools (CIS)
- Making Officer Redeployment Effective (MORE)

The first of these Hiring grant programs, was the Police Hiring Supplement (PHS) grant. This grant was administered by the Bureau of Justice Assistance. PHS was created with the intent to increase police presence in America's communities. Limited funding prohibited the full implementation of PHS and, consequently, only 9% of the overwhelming number of applicants were funded. With the establishment of the COPS Office in October 1994, the remaining qualified PHS applicants (392 agencies) were funded under the Phase I program.

The AHEAD and FAST Programs were the next two programs created by COPS in November 1994. The purpose of the AHEAD Program was to provide funds to larger law enforcement agencies for the purpose of hiring community policing officers. The AHEAD Program provided funds to communities whose populations were 50,000 or more. The FAST Program provided funds to law enforcement agencies for hiring Community Policing officers in communities whose populations had less than 50,000.

In 1995, COPS merged the AHEAD and FAST programs into the Universal Hiring Program (UHP), which provides funds to jurisdictions of any size to hire additional community policing officers. UHP provides funding to eligible entities, regardless of size, who have primary law enforcement authority in their area of jurisdiction.



In 1999, the COPS Office added the COPS in Schools (CIS) Grant Program as an officer hiring program that provides an incentive for law enforcement agencies to build working relationships with schools to use community policing efforts to combat school violence. Funds awarded under the CIS program are to assist law enforcement agencies in hiring additional sworn officers at entry-level officer salaries to serve as School Resource Officers (SROs). Alternatively, CIS funds may be used to pay for entry-level salary and benefits of newly hired, additional sworn officers who will backfill the positions of locally-funded veteran officers deployed as SROs.

The MORE Program, originally created in 1994, provides funding to acquire civilians and/or new technologies. The purpose of these acquisitions is to save sworn officers' time spent on administrative and support tasks, thereby allowing them more time for redeployment into community policing. Each item or position funded under the MORE Program must free up time for a sworn officer (or officers), who is (are) then required to perform community policing activities using that extra time. It should be noted that overtime for sworn officers engaging in community policing activities was also an allowable expense for the MORE '95 grants, but is not allowable under AHEAD, FAST, UHP, CIS or any other MORE grant programs.

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

IV. Monitoring and Auditing Requirements

IV. Monitoring and Auditing Requirements

Federal regulations require that the Federal government monitor any financial assistance to ensure that funds are spent properly. All COPS grantees are required to participate in grant monitoring and auditing activities by the COPS Office, the DOJ's Office of the Inspector General (OIG), the DOJ's Office of Justice Programs' Office of the Comptroller (OC), the U.S. General Accounting Office (GAO), and other duly authorized representatives of the Federal government.

The purpose of monitoring is to ensure that grantees meet their programmatic and financial requirements by properly managing funds and following grant program requirements. In general, the COPS Office monitors program activities and financial activities. Monitoring activities include on-site program reviews, the COPS Count survey, Office-Based Grant Reviews, and office-based complaint, financial, and legal reviews.

In addition to direct COPS Office oversight, COPS grants may be subject to an audit by independent or other DOJ examiners. The two primary types of audits are Single Audit Act (SAA) audits and DOJ OIG audits. These audits are designed to determine whether systems are in place and controls established. These reports also provide reasonable assurance that the grantee is managing funds in compliance with laws and regulations.

Failure to comply with monitoring and audit requirements or to remedy any identified grant violations may result in adverse current and future funding determinations, as well as enforcement activities such as suspension or termination of funds, the requirement to repay previously expended grant funds, being barred from receiving further COPS grants, and criminal liability in the event of fraud. The COPS Office and its Federal partners will work closely with COPS grantees to address all identified violations and to provide technical assistance and guidance to help prevent violations from occurring.

COPS Monitoring

The COPS Office is responsible for monitoring the programmatic and financial aspects of grant awards. Six activities may be used to monitor grant awards by COPS: 1) on-site program reviews, 2) COPS Count survey, 3) Office-Based Grant Reviews, 4) complaint reviews, 5) program progress report reviews, and 6) legal reviews and guidance.



COPS On-Site Program Reviews. The objective of the COPS on-site reviews is to evaluate whether selected grantees are meeting their programmatic and financial requirements. Using site visits as one type of monitoring method, the COPS Office is committed to ensuring that COPS grants are properly and effectively implemented pursuant to the authorizing statute, grant assurances and guidelines, and all applicable Federal statutes and regulations.

A site visit provides the COPS Office with the knowledge and documentation of how COPS funds are being used; how compliance issues are being addressed by the grantee; and provides firsthand observation of COPS program implementation and progress.

COPS Count. COPS Count is a survey conducted for a sample of MORE grants, to provide an accurate accounting of law enforcement officers redeployed through the purchasing of equipment or hiring of civilians funded by the COPS Office.

During the survey, COPS MORE grant recipients will be contacted by the COPS Office to complete the survey. The grantee will provide updates on the status of grant funded civilian personnel and equipment as well as redeployment dates and related questions for MORE grants and grantee plans concerning future hiring of civilians and redeployment.

Office-Based Grant Reviews (OBGR). The Office-Based Grant Review (OBGR) serves as a supplemental activity in support of the overall grant monitoring strategy. It is intended to provide detailed grant monitoring oversight for certain COPS grantees that may not meet the on-site monitoring criteria in a particular fiscal year due to their location and/or amount of funding. The OBGR specifically targets COPS hiring grantees although other types of grants may be reviewed for the same grantee.

Similar to an on-site program review, the OBGR begins with an internal review of grant documentation followed by direct contact with the grantee and the collection of additional and/or supporting documentation to demonstrate whether the grantee is in compliance with its grant requirements. It allows the COPS Office to monitor an overall larger number of grantees than would otherwise be possible only through conducting site visits.

Complaint Reviews. The complaint review system provides a centralized process within the COPS Office to investigate external (media, citizens, etc.) and internal complaints of grantee noncompliance. A determination is made whether the issues can be resolved through phone or letter contact, or if a site visit is warranted by COPS or the OIG. The complaint review process includes a review of the grantee's response to the complaint allegations, grantee program progress reports, COPS Count data, COPS Finance/OIG site visit reports, and any other relevant information, including the results of a site visit if deemed necessary.

Program Progress Report Reviews. Grant monitoring is supplemented by reviews of the Hiring and MORE grants Program Progress Reports throughout the life of the grant.

Legal Reviews and Guidance. Additional monitoring is conducted by the Legal Division, including the following areas: contract and cooperative agreement reviews; sole source justification; supplanting and other compliance issues; appeals of compliance determinations; and OIG investigations of COPS grantees involving fraud, abuse, and integrity laws. Additionally, the Legal Division provides verbal and/or written guidance to grantees on the legal and programmatic requirements of the COPS grant programs to assist in the proper implementation of grant funding.

Financial Monitoring

The COPS Office also monitors financial issues related to grant awards. There are two primary activities that are used to monitor the financial aspects of grant awards: 1) on-site financial reviews and 2) office-based financial reviews.

On-Site Financial Reviews. On-site financial reviews are conducted at the grantee's location to assess overall financial management of a grant with a focus on providing the grantee with immediate technical assistance to correct any weaknesses identified. The on-site financial review includes a review of: (1) the grantee's accounting system and internal controls over the administration of COPS grants; (2) the grantee's cash management procedures; (3) the timeliness and accuracy of Financial Status Reports submitted; and (4) the expenditures charged to the grant to determine if expenditures are allowable and supported.



Office-Based Financial Reviews. Grantees are required to submit financial status reports quarterly to COPS Office detailing grant obligations and expenditures. Based in part on the quarterly Financial Status Reports, the office-based financial review includes an analysis of grant activity to date, financial reporting and reconciliation with payments under the grant and local match payments.

Auditing

Office of the Inspector General (OIG) Audits. The OIG was established by law to provide oversight for DOJ Programs, financial and administrative functions. 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.

All COPS grants, cooperative agreements, and contracts are subject to possible audit by the OIG. Typically, OIG audits encompass all Hiring and MORE grants awarded to the agency, both active and expired. The OIG conducts testing to determine compliance with program, administrative, and financial requirements for each of the grants selected. Compliance areas may include, but are not limited to, supplanting, retention, allowable costs, local match, redeployment, financial and programmatic reporting, and community policing grant provisions. Once the audit is completed, OIG issues a report to the COPS Office and to the grantee, which includes an analysis of areas deemed to be in noncompliance and recommendations for corrective action.

Upon issuance of an audit report, the COPS Office serves as a liaison between the OIG and the audited grantee to review the grantee's response to the audit findings provide technical assistance to the grantee, and resolve and remedy areas of confirmed noncompliance.

Independent Audits. The Single Audit Act (SAA) was created in 1984, and established uniform auditing 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.



Each non-Federal entity that expends a total amount of Federal awards equal to, or in excess of, \$500,000 in a fiscal year, is required to have an SAA audit for that fiscal year.

An 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.

COPS Audit Division. The COPS Audit Division is the division within the COPS Office responsible for facilitating closure of audit reports issued by the Office of the Inspector General (OIG) and the General Accounting Office (GAO). The Audit Division serves as the liaison between the OIG and/or GAO and affected grantees or program staff during the conduct of all audits. The Division also responds to all draft audit reports and obtains relevant information from the grantee. Other responsibilities include: facilitating closure of open audit recommendations by corresponding with the grantee; gathering relevant documentation to determine whether the grantee has complied with the terms and conditions of the grant; and ensuring that the grantee remedies any violations in a manner deemed appropriate by the COPS Office, the OIG and/or the GAO.

Suspension or Termination of Grant Funding

The COPS Office may suspend or terminate funding of a grant in whole or in part if the COPS Office determines that a grant recipient is not:

- substantially complying with the requirements of the Violent Crime Control and Law Enforcement Act of 1994 or with other applicable provisions of Federal law;
- making satisfactory progress toward the goals or strategies in the application and information as reflected by performance and status reports;
- adhering to grant agreement requirements or conditions, whether stated in a Federal statute, regulation, assurance, application, or notice of award;



- submitting reports in a timely manner;
 - filing accurate information in an application, periodic report, or other document; or
 - submitting for prior approval to the COPS Office any significant changes that the grantee anticipates being made to the application before implementing those changes.
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Grant Monitoring Standards and Guidelines for Hiring and Redeployment

V. COPS Compliance Definitions & Conditions



V. COPS Compliance Definitions & Conditions

The eight primary compliance categories of the COPS Hiring and MORE grant programs are:

- A) Community Policing
- B) Retention
- C) Allowable Costs
- D) Source and Amount of Matching Funds
- E) Supplanting
- F) Reporting
- G) Training: Special Condition CIS Grant
- H) Timesavings for Redeployment*

This section defines the eight categories and provides the accompanying conditions that are required to be in compliance with the COPS Hiring and MORE grants. Each category also includes examples to further clarify special conditions or calculations.

*It is important to note that the Timesavings for Redeployment category pertains to the MORE Grant Program only.

A. 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. 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.

The community policing approach requires the police and citizenry to join as partners in the course of both identifying and effectively addressing the causes of crime and disorder. The focus of the police is not only on enforcement, but also on emphasizing the need for crime prevention and for proactively addressing the root causes of crime and disorder. The community is actively engaged in collaborating on prevention and problem-solving activities with a goal of reducing victimization and fear of crime.



CONDITIONS

The COPS Office maintains that local agencies are best suited to determine their community crime-related problems and the policing activities that will solve them. Police, community members, and other public and private entities work together to address the underlying problems that contribute to crime and disorder by identifying and analyzing problems, developing suitable responses, and assessing the effectiveness of these responses. Acceptable community policing activities are unique to each local community and must be addressed on an individual basis through the community policing plan submitted to and approved by the COPS Office.

Required Number of Community Policing Officers. Under COPS Hiring grants, every grant-funded officer position (or an equal number of veteran officer positions) is required to initiate or enhance community policing. For example, a COPS Universal Hiring Program grantee with 10 COPS grant-funded officers must deploy 10 officers (COPS-funded or veteran officers) to initiate or enhance community policing through the approved community policing plan. This does not mean that every hour of the officers' time must be spent in a specific community policing "activity," but it does mean that the grantee must show the required number of officers initiating or enhancing community policing above the pre-award number. In addition to increasing the number of officers involved in community policing by the number of officers awarded, there must also be an increase in community policing activity by the grantee from pre-award community policing activities.

Community Policing Activity Approval. The COPS Office is responsible for reviewing and approving the community policing plans that are identified in grant applications. 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 particular community policing strategies from the approved plan on an as-needed basis throughout the life of the grant.

Changes to Community Policing Plans. Any significant changes to the community policing plan identified in the grant application must be submitted in writing to the COPS Office for approval. 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.



Career Law Enforcement Officer. Hiring grants allow for payment of approved entry-level salaries and benefits for the hiring or rehiring of additional sworn career law enforcement officer positions. A "sworn career law enforcement officer" is a person hired on a permanent basis who is authorized by law or by a State or local public agency to engage in, or oversee, the prevention, detection, or investigation of violations of criminal laws. Grant funds allow for the hiring of new, additional officers over and above the number of sworn officers that an agency would fund with State, local or BIA funds in the absence of the grant. Law enforcement agencies may enhance their community policing by deploying the new, additional COPS-funded officers into community policing or by deploying an equal number of veteran officers into community policing (and then back-filling the veteran officers' positions with the newly hired, additional COPS-funded officers).

COPS in Schools (CIS) School Resource Officer (SRO). The COPS in Schools Grant Program provides an incentive for law enforcement agencies to build working relationships with schools to use community policing efforts to combat school violence. The CIS grant program allows for the hiring of new, additional sworn officers at entry-level salaries to serve as School Resource Officers, over and above the number of sworn officers that an agency would fund with State, local or BIA funds in the absence of the grant (including other School Resource Officers). 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.

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

- a. address crime and disorder problems, gangs, and drug activities affecting or occurring in or around an elementary or secondary school;
- b. develop or expand crime prevention efforts for students;
- c. educate likely school-age victims in crime prevention and safety;
- d. develop or expand community justice initiatives for students;
- e. train students in conflict resolution, restorative justice, and crime awareness;
- f. assist in the identification of physical changes in the environment that may reduce crime in or around the school;
- g. assist in developing school policy that addresses crime; and
- h. recommend procedural changes.



The agency implements the community policing activities as approved in the CIS application, focusing on SRO duties and related community policing strategies. The SRO must spend a minimum of 75% of time in and around the schools working on youth-related activities. There must be an increase in community policing activities that are being performed by CIS-funded SROs from the pre-grant activities, as well as a corresponding increase in the number of officers deployed into the partner school(s) as SROs.

MORE Grants Support Community Policing. Community policing activities that are supported by MORE grants adhere to the same criteria as the Hiring grants. Sworn officers are redeployed to enhance community policing activities as a result of timesavings achieved through the use of technology, equipment, overtime, or civilian support services that are funded by MORE grants. Again, as with the community policing requirement of the UHP grant, not every hour of redeployment is required to be spent in a specific community policing activity, nor must every community policing activity identified in the community policing plan be conducted.

Examples of Hiring and MORE Community Policing Activities. Agencies have a variety of community policing activities and programs. The COPS Office reviews activities approved in the grant application's community policing plan. The following are just a few examples of community policing programs:

- **Crime Prevention Efforts**
Examples: Youth programs; anti-drug programs; regular meetings with community groups to discuss crime; and anti-violence programs.
- **Problem-Solving Activities**
Examples: Identifying crime problems with members of the community and other government agencies (e.g., probation office, prosecutor and courts); identifying crime problems by looking at crime trends; identifying top problems by analyzing repeat calls for service; preventing crime by focusing on conditions that lead to crime (e.g., abandoned buildings and cars); building on information systems to enhance crime analysis capabilities; regularly surveying community members to assist in identifying and prioritizing crime problems; locating offices or stations within neighborhoods; and providing community policing training to citizens.



Examples: Working with citizens to identify and address community crime problems; using computer systems to collect and analyze information, particularly repeat calls for service; coordinating specific problem-solving projects to address problems on their beats; working with other public agencies to solve disorder problems (e.g., trash collection, public works agencies to solve lighting problems); and mapping crime problems.

- Community Partnerships

Examples: Meeting with community members to learn more about the nature of specific problems; and involving community members in selecting responses to problems and determining measures of success.

Examples: Participating in neighborhood watch programs, citizen volunteer programs, citizen advisory groups to the law enforcement agency; citizen patrols within the community; and anti-drug or anti-violence programs.

Examples: Participating with community organization working groups and/or special programs for schools and other interest groups which enhance crime prevention. Program examples are: Private Security, Drug and Alcohol Resistance Education (DARE), Gang Resistance Education and Training (GREAT), Triad, School Resource Officer (SRO).

- Other Agency Partnerships

Examples: Juvenile justice services; probation; social services; parole; city and county departments; sanitation services; school system; elected officials; private security and other public service providers.

- Patrol

Examples: Targeted geographic patrol, foot patrol, bike patrol or mounted patrol; making door-to-door contact with citizens and businesses; meeting with community leaders and groups to learn more about crime problems and jointly develop crime prevention plans; using business cards, cellular phones or beepers to maintain contact with citizens regarding public safety concerns; and working in schools or other public agencies to teach crime prevention.



- **Evidence of Community Policing Philosophy**
Integrating community policing into a traditional policing environment is an evolutionary process. The COPS grant award is an aid to this evolutionary process and, therefore, the evaluation of community policing activities is unique to each local agency.

Evidence that law enforcement agencies are incorporating a community policing philosophy is witnessed through three core elements: 1) police organizational elements; 2) tactical elements; and 3) external elements. Agencies may be anywhere on the continuum of incorporating community policing into their operation; therefore, a variety of activities are acceptable.

1. Police organizational elements

- a. Philosophy adopted organization-wide. Department-wide adoption of community policing is evidenced by the integration of the philosophy into mission statements, policies and procedures, performance evaluations and hiring, promotional practices, training programs, and other systems and activities that define organizational culture and activities.
- b. Decentralized decision making and accountability. In community policing, individual line officers are given the authority to solve problems and make operational decisions concerning their roles, both individually and collectively. Leadership is required and rewarded at every level, with managers, supervisors and officers held accountable for decisions and the effects of their efforts at solving problems and reducing crime and disorder within the community.
- c. Fixed geographic accountability and generalist responsibilities. In community policing, the majority of staffing, command, deployment and tactical decision-making is geographically based. Appropriate personnel are assigned to fixed geographic areas for extended periods of time in order to foster communication and partnerships between individual officers and their community. These personnel are accountable for reducing crime and disorder within their assigned area.

d. Utilization of Volunteer Resources. Community policing encourages the use of non-law enforcement resources within a law enforcement agency. The law enforcement organization educates the public about ways that they can work in partnership with the organization and its members to further community policing, and provides an effective means for citizen input. Volunteer efforts can help to free up officer time, and allow sworn personnel to be more proactive and prevention oriented.

2. Tactical elements

- a. Enforcement of laws. Community policing complements the use of proven and established law enforcement strategies, becoming one of many tools available to officers that can be collectively employed to prevent and combat crime.
- b. Proactive, crime-prevention oriented. Under community policing, the focus of the police is not only on enforcement, but also emphasizes the need for crime prevention and for proactively addressing the root causes of crime and disorder. The community is actively engaged in collaborating on prevention and problem-solving activities with a goal of reducing victimization and fear of crime.
- c. Problem solving. Police, community members, and other public and private entities work together to address the underlying problems that contribute to crime and disorder by identifying and analyzing problems, developing suitable responses, and assessing the effectiveness of these responses. While enforcement is an integral part of policing, problem solving relies more on preventing crime through deterring offenders, protecting likely victims, and making crime locations less conducive to problems.

3. External elements

- a. Public involvement and community partnerships. In community policing, citizens as well as private security are viewed by the police as partners who share responsibility for identifying priorities, and developing and implementing responses. Accurate surveying of customer needs and priorities is one way to determine the problems that drive police services, and give the public ownership of the problem-solving process.



b. Government and other agency partnerships. Under community policing, other government agencies are called upon and recognized for their ability to respond to and address crime and social disorder issues. The support and leadership of elected officials, as well as the coordination of the police department at all levels, are vital to the success of these efforts.

B. Retention

DEFINITION

COPS Hiring and MORE grantees are required to retain the additional grant-funded officer positions (for Hiring grants) and/or the additional equipment, technology, or civilians and resulting officer timesavings (for MORE grants) for one full local budget cycle following the expiration of the respective COPS grant implementation period (e.g., the 36-month funding period per additional officer position under the Hiring grants and the 12-month redeployment period under the MORE grants). During the active grant periods, prior to the actual retention period, grantees may be required to demonstrate how they are planning to meet this retention requirement.

Retention planning documentation must be submitted with the Hiring grant application, beginning with applications submitted after June 16, 1998, and with the MORE '98 grant program. For prior grantees that were not required to submit retention planning documentation with the grant application, the COPS Office may require evidence of retention planning efforts during the active grant periods.

Under the Hiring programs, retention is defined as using local funds to continue employing the additional officer position(s) awarded under the COPS grant for one full local budget cycle at the conclusion of the 36-month funding period for each position. The additional positions must be retained over and above all locally-funded sworn officer positions that would exist in the absence of the grant. Retention therefore may not be achieved by absorbing COPS officers into locally-funded vacancies through attrition.

Similarly, under the MORE program, retention is defined as retaining the required level of officer timesavings for one full local budget cycle by using local funds to continue implementing the funded equipment or technology, or continue employing the additional civilian position(s) awarded, over and above all locally-funded civilian positions that would exist in the absence of the grant.



CONDITIONS

Hiring grantees must retain the additional federally funded positions at the conclusion of the 36-month Hiring grant funding period with State or local funding for at least one full local budget cycle.^{1,2}

MORE grantees must retain the federally funded technology/equipment and/or civilians and the resulting redeployment once the required level of redeployment has been met with State or local funding for one full local budget cycle.³

During the active grant period, Hiring and MORE grantees may be required to demonstrate that they are planning to meet this retention requirement. Evidence of retention planning documentation may come in three forms: 1) a written retention plan, 2) supporting evidence of retention planning; or 3) retention certification.

Planning evidence may consist of memoranda, minutes of meetings, budget documents, and other planning documents produced during the grant period that demonstrate that the grantee is seeking sources of State or local funds to retain the additional officer positions, civilian positions, or equipment and technology (i.e., through upgrades or maintenance funding), as applicable. Grantees may be required to produce evidence of their progress in implementing their retention plans during any monitoring or audit activities. Additionally, grantees are required to answer questions in the Department Annual Reports and MORE Progress Reports regarding retention plans.

The Retention Plan. Retention plans submitted to the COPS Office must include these two elements:

1. Document co-signed by Law Enforcement Executive (Chief/Sheriff/Director of Public Safety, etc.) and Government Executive (Mayor/City Manager/Chairman of County Commission, etc.) that identifies:
 - The proposed source of funding for the position(s) and technology or equipment;
 - Identification of the grant(s) covered by the retention plan; and/or
 - The number of positions and/or level of redeployment planned to be retained.

¹ The Phase I grant conditions did not include a retention requirement.

² See Appendix A for a definition of the Hiring grant funding period.

³ Similarly, MORE '95 overtime grantees were required to plan to continue the sworn officer overtime activities funded under the grant award.



2. Documentation, including but not limited to: local council minutes; inter-office memoranda; local government officials' memoranda and/or future budget projections that demonstrate intent to retain the COPS-funded positions and for level of redeployment with State or local funds at the conclusion of the grant period. For example:
 - Documents that demonstrate an intent to add the COPS positions to a request for local funding during local budget negotiations;
 - Documents that demonstrate the jurisdiction's attempts to seek additional law enforcement funding from private sources, including corporate, non-profit, and foundation donations or grants; and/or
 - Documents that demonstrate that the jurisdiction will try to obtain other non-federal funding sources (such as State grants, for example) to support the additional positions.

The COPS Office monitors retention to ensure that the grantee complied with the retention requirement for one full local budget cycle after the conclusion of the Hiring grant funding period for Hiring grants, or after the achievement of the required level of redeployment for MORE grants. This means that grantees must complete the budget cycle in which the grant funding period or redeployment period ends *plus* one full local budget cycle thereafter.

Grantees that cannot comply with the retention requirement, and wish to request an exemption from the retention requirement, must submit documentation to support mitigating circumstances that prevent retention. The COPS Office will review each situation on a case-by-case basis to determine if there is evidence of sufficient mitigating factors to justify an exemption from the retention requirement. Examples of possible acceptable mitigating circumstances are provided at the end of this section. Those agencies exempted from the retention requirement will be required to wait at least one year before applying for additional COPS funding that contains a retention requirement. The one-year waiting period begins at the end of the applicable grant funding or redeployment period, when the retention requirement would have begun.

Grantees that cannot comply with their retention plan and cannot demonstrate sufficient mitigating circumstances will not be eligible for an exemption from the retention requirement. If a grantee is denied a retention exemption and still is unable to retain, the grantee is in violation of the retention requirement and is subject to sanctions, including a bar period for all new COPS funding with a retention requirement.



Examples – Retention Planning, Retention Plan, and Mitigating Circumstances

- Evidence that retention planning efforts occurred throughout the life of the grant may include, but are not limited to:
 - Memoranda, minutes of official meetings or other documentation which demonstrate that the jurisdiction attempted to add the COPS positions to a request for local funding during local budget negotiations
 - Memoranda, minutes of elected official meetings or other documentation which demonstrate that the jurisdiction attempted to obtain other non-federal funding sources (such as State grants, for example) to support the additional positions at the termination of the COPS grant
 - Memoranda, minutes of elected official meetings or other documentation which demonstrate that the jurisdiction attempted to seek additional law enforcement funding from private sources, including corporate, non-profit, and foundation donations or grants
- Example of a Retention Plan. This must be written on agency letterhead and signed by the Government Executive and/or Law Enforcement Executive.

This letter is to indicate that the ABC Police Department has employed three (3) officer positions under the provisions of UHP grant #2001UMWX0000, as well as employed one (1) civilian position under COPS MORE grant #2000CLWX0000. The City of ABC, along with the ABC Police Department, plans to retain these positions and fund them through the City of ABC's general fund. We will retain these four positions for at least one full local budget cycle, ending 9/30/04. Please find attached the City Council minutes supporting the retention plan.

- Mitigating circumstances are those which demonstrate severe financial distress, a natural disaster, or similar factors that significantly impacted a grantee's financial circumstance and prevented retention. Mitigating circumstances may include, but are not limited to, the following situations when documented by the grantee:
 - Jurisdiction has been declared bankrupt by a court of law;
 - Jurisdiction has been placed in receivership, or its functional equivalent, by the State or Federal government;



- Jurisdiction has been declared a financially distressed area by its State or a Federal government agency;
- Budgetary imbalance or expenditure cutbacks resulting in significant reductions in other services provided by the law enforcement agency or significant reduction-in-force of the agency's personnel;
- Extraordinary and unanticipated nonrecurring expenses and/or loss of revenue (including closure or relocation of major employers) resulting in material effect on a jurisdiction's fiscal condition;
- Significant downgrading of a jurisdiction's bond rating for fiscal-related reasons
- Filing for bankruptcy, receivership or similar measure, with the request for relief pending; and
- Location within an area in which a declaration of major disaster has been made pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

Impact of Failure to Retain on Other Active COPS Grants. An agency which fails to retain officer positions funded by one COPS grant may also be in violation of the nonsupplanting requirement for an unjustified reduction in baseline officers if the grantee also has other active COPS Hiring grants. For example, a failure to retain one COPS FAST officer position, which otherwise would have been retained with local funding, may result in an unapproved baseline reduction for the active UHP grant, since the retained COPS FAST officer position should have increased the UHP grant baseline by one position. To comply with the nonsupplanting requirement, the grantee must demonstrate that the failure to retain the FAST officer position with State or local funding following grant expiration occurred for reasons unrelated to the UHP grant.

C. Allowable Costs

DEFINITION

Allowable costs are those costs that a particular COPS program will fund, as specified by the requirements of the grant. The requirements include: the approved budget; the financial clearance memorandum; and the applicable Uniform Administrative Requirements. 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 are different for Hiring grants and MORE grants.



Hiring Grants

For Hiring grants, allowable costs encompass the entry-level salaries (including specifically approved benefits and cost-of-living increases as specified and approved in the grant award) for three years (36 months) for newly hired, additional sworn entry-level, lateral-transfer, or rehired officers. Allowable salaries and benefits must be based on the grantee's standard entry-level salary/benefit package, regardless of the experience of the individual officers hired (although grantees may pay any extra costs with local funds), in addition to any required local match.

- Under Phase I, AHEAD, FAST, and UHP, up to 75% of an entry-level salary, with a \$75,000 limit over the three-year grant period, will be paid by federal funds. Local funding must pay the remaining portion of the salary through the required local match.
- The CIS Program does not require a local match, providing federal funds for entry-level salary and benefits up to \$125,000 per position over the three-year grant period. Any costs above this amount will be paid with local funding.

MORE Grants

For MORE civilian grants, allowable costs encompass the salaries, including approved benefits, for civilian hires during the life of the grant, including renewal periods if applicable. [Unlike the COPS Hiring grants, the MORE civilian program is not based on entry-level salary and benefits, but may reflect the actual (approved) salary and benefit costs for the funded civilian positions.] For MORE equipment and technology grants, the allowable costs of approved items are also identified in the award. In addition, the MORE '95 Grant Program allowed for certain overtime costs of officers.

MORE funds will pay up to 75% of the approved allowable costs, with the remaining portion of the costs paid with local funding.

CONDITIONS

Allowable costs are different for Hiring and MORE grant awards.

Hiring Grants

If the award is for a full-time Hiring grant, funding allows for hiring new, additional full-time sworn officers at the grantee's standard entry-level salary and approved benefit rate. However, grantees may pay any higher than entry-level salary and benefit amounts to individual officers using local funds in addition to the required local match. Alternatively, with prior written approval from the COPS Office, a grantee may promote a part-time officer to the full-time COPS grant-



funded position, as long as the grantee replaces the part-time vacant position with a newly hired officer using local funding before expending COPS grant funds on the new full-time position. The newly hired, additional COPS-funded sworn officers may be deployed to fulfill the community policing functions of the grant, or the department alternatively may redeploy one veteran officer for each new hire to community policing activities.

If the award is for a part-time Hiring grant, the salary costs, including approved benefits, are only allowable if grant funds are used to pay for a newly hired part-time officer, not to increase the hours of the currently employed part-time officer(s). Part-time hours are defined by the grantee in the application and approved by the COPS budget memorandum.

For both full-time and part-time grant awards, it is acceptable for grantees to recruit and hire non-sworn officers with COPS grant monies as long as the individual will promptly become a sworn officer through the standard training and swearing-in procedures required by the grantee's State or local law. Grant funds may be used to pay the non-sworn recruit's salary and benefits during that training period if this is the grantee's standard practice for all locally-funded officers as well.

The determination of allowable costs for Hiring grants is based on the grantee's standard salary and benefits for entry-level sworn officer positions (though some particular benefits offered by the grantee may not be included as allowable costs by the COPS program). If the officer hired to fill the position is not entry level, the grant funding still cannot pay for more than 75% of the portion of the salary and benefits of a position that is entry level. The grantee may pay the additional costs with local funds in addition to the required local match. The approved COPS budget and financial clearance memorandum will specify the approved allowable federal costs and the recipient's required local match.

MORE Grants

If the award is for a MORE grant, funding allows for the payment of support resources, including the salaries and approved benefits of civilian personnel, technology and equipment, and overtime (MORE '95 only) for sworn officers engaging in community policing activities. The allowable costs must directly contribute to timesavings and thereby enhance the community policing presence through officer redeployment. MORE grants are awarded for one year only. Renewals are available for up to two years after the initial grant period for civilian hires, at the discretion of the COPS Office and subject to funding availability.

For technology and equipment purchases, the term of the grant funding is one year, with no option for renewal. Monitoring efforts evaluate whether the costs are timely and allowable. For COPS compliance purposes, "timely" is defined as consistent with the local government's procurement practices, and "allowable" is defined as the costs specified on the grantee's approved award budget.

- It should be noted that it may be permissible to obtain additional items in support of the MORE grant as a result of cost savings. For example, a department requests and receives funding to obtain eight (8) computers and is able to obtain 10 computers at the same price due to discounts. All use of saved funds must be consistent with the program outlined in the approved application. As of March 8, 1999, the COPS Office required prior written approval only if the utilized saved funds are in excess of \$1,000. However, the agency is not required to demonstrate additional redeployment based on the use of this money since the required redeployment is linked to the dollars spent rather than the number of items purchased.

EXAMPLES

Allowable/Unallowable Costs by Program

Hiring Grant Allowable Costs

Allowable costs include the salaries and approved fringe benefits for three years (36 months) for sworn entry-level, lateral-transfer, or rehired officers. Up to 75% of the entry-level salary and benefits actually incurred, with a \$75,000 limit over the three-year grant period, will be paid by award money with the remaining portion of the salary paid by local funding.

- Approved fringe benefits include, but are not limited to, department costs for FICA/Social Security, health insurance, life insurance, vacation and sick leave not included in base salary, retirement benefit contribution, worker's compensation, and unemployment insurance. Fringe benefits must be part of the grantee's standard benefit package for locally-funded entry-level officers to qualify as allowable under the COPS grant. Fringe benefits that are absolutely NOT approved are costs of equipment, training, uniforms, vehicles, and overtime. For assistance in determining other allowable costs approved under specific Hiring grants, please refer to the COPS budget memorandum, which all grantees receive as part of their award package.



- Salary and benefits may be paid during training if this is the grantee's standard practice for all officers. Examples of training include, but are not limited to, academy training, field training, and probationary training.
- If the grantee chooses to transfer veteran officers into community policing activities, the veteran officers do not have to begin those activities until the new hires finish the required training program for that particular grantee. (Training programs include academy, field, and probationary training.) The reason for this policy is twofold. First, if veterans were deployed to community policing while the new hires are in training or are not fully prepared to fill the vacant position, there would be a deficiency in another area of the police department. Second, the policy encourages consistency for COPS grantees by allowing departments to transfer veterans to community policing at the time that the newly hired officers graduate from training, which is the same time that the newly hired officers otherwise would have been deployed directly into community policing. Note that in this circumstance, the allowable costs are still the costs associated with the newly hired officers, rather than the veteran locally-funded officers who are redeployed into community policing to fulfill the grant requirements.

MORE Grant Allowable Costs

- **MORE '95, '96, '98** (**this list includes the majority of funded items, but items not on this list may have been approved on a case-by-case basis for particular MORE '95, '96, or '98 grants*)
 - a. mobile data computers/laptops
 - b. crime analysis hardware/software
 - c. mapping software
 - d. personal computers
 - e. automated aided dispatch systems
 - f. automated booking systems
 - g. dictation systems
 - h. salary and benefits to civilians that result in the redeployment of sworn officers
 - i. administrative assistants
 - j. record clerks
 - k. booking clerks
 - l. dispatchers
 - m. certain training costs
 - n. certain overtime costs for officers (allowable for MORE '95 only)



- **MORE 2000**
 - a. salary and benefits to civilians that result in the redeployment of sworn officers
 - b. administrative assistants
 - c. record clerks
 - d. booking clerks
 - e. dispatchers

- **MORE 2001**
 - a. mobile data computers/laptops
 - b. crime analysis hardware/software
 - c. mapping software
 - d. personal computers
 - e. automated aided dispatch systems
 - f. automated booking systems
 - g. dictation systems

- **MORE 2002**
 - a. mobile data computers
 - b. computer aided dispatch systems
 - c. records management systems
 - d. crime analysis hardware/software
 - e. automated booking systems
 - f. automated fingerprint identification system
 - g. video arraignment equipment
 - h. personal computers

The COPS budget memorandum specifies the approved allowable costs for each grant award. Under the Hiring and MORE grants those items not approved are unallowable costs. Examples of those costs include, but are not limited to, the following.

Hiring Grant Unallowable Costs

- a. overtime
- b. training (other than salary or benefits paid during training)
- c. weapons
- d. communication equipment
- e. uniforms
- f. vehicles
- g. indirect costs

MORE Grant Unallowable Costs

- a. direct salaries and benefits of sworn officers
- b. police vehicles
- c. vehicle siren equipment
- d. office equipment/furniture
- e. weapons and ammunition



- f. cellular telephones
- g. radios
- h. pagers
- i. uniforms
- j. narcotics dogs/horses
- k. bullet proof vests
- l. breathalyzers
- m. radar guns
- n. video cameras
- o. phone lines and voice mail systems
- p. educational material
- q. televisions/VCRs
- r. indirect costs
- s. all equipment and technology (unallowable for MORE 2000 only)
- t. overtime (unallowable for all MORE programs except MORE '95)

D. Source and Amount of Matching Funds

DEFINITION

In the absence of a local match waiver (discussed below), the grantee is obligated to match a portion of the costs of the program, project, or activity as funded by the COPS program. With the exception of the CIS Program (see below), grant awards may cover only up to 75% of the project costs over the grant period as outlined in the application submission; therefore, the grantee must contribute at least 25% of total project costs unless a waiver is obtained from the COPS Office. Waivers are approved on a case-by-case basis based on severe fiscal distress. Qualifying agencies may receive a partial waiver of which 90% of the project costs are paid by federal funds, with a corresponding 10% local match, or a full waiver in which 100% of the project costs are paid with federal funds.

Any required local match must be fully paid before the end of the grant funding period. The grantee should be able to identify the source of matching funds, the amount paid, and the timing of the payments. The local match requirement follows the logic that the COPS Program supplies "seed" money to law enforcement agencies to initiate or enhance community policing.

For the CIS Program, however, a local match is not required. The CIS Program, funds school resource officer salary and benefits over the three-year grant period with an increased funding cap of \$125,000 per officer. Additional salary or benefits must be paid with State or local funds. No other local match is required.



CONDITIONS

The Hiring and MORE grant awards have different compliance conditions for the local match requirement:

For Hiring grant awards (AHEAD, FAST, UHP), the COPS grant will provide up to 75% of an entry-level salary and benefits package over three years with a maximum of \$75,000 per position. Grantees are responsible for at least 25% of the salary and fringe benefit package through the local match. If a particular COPS officer's salary is not entry level due to experience (i.e., a lateral hire from another jurisdiction), academic attributes, or other reasons, any portion of the salaries or fringe benefits that is above entry-level must be provided by the grantee in addition to the required local match. CIS grantees, while not otherwise required to pay a local match, are responsible for any additional costs for entry-level salaries and benefits over the maximum of \$125,000 (over three years) per officer.

For all MORE grant awards, the COPS grant will provide up to 75% of the allowable costs for equipment and technology and civilian support services under the grant guidelines. Grantees are responsible for contributing at least 25% of the remaining costs. For civilian hires, the COPS grant will provide up to 75% of the salaries and approved benefits packages. Unlike the Hiring grant programs, the 75% reimbursement is not based upon entry-level salary and benefits, but is based, instead, on the actual salary and benefits packages of the approved civilian positions.

For Hiring and MORE grantees, if the total project costs actually incurred by the grantee are higher than the costs anticipated in the approved grant application, the grantee must pay for the additional costs with State and/or local funds. If the actual project costs are lower than originally anticipated, grantees (except CIS grantees) still must ensure that they contributed the legally required minimum 25% of actual project costs with State and/or local funds (in the absence of a local match waiver).

Local Match Guidelines

There are several guidelines that must be observed by grantees when meeting the local match requirement, regardless of the type of grant awarded. One of these guidelines concerns the minimum required level of local matching throughout the life of the grant. For MORE grants, the grantee is responsible for at least 25% of the total cost of



allowable items. For hiring grants (with the exception of CIS), the local share also must be at least 25% of the total cost of salaries and fringe benefits over the three-year funding period.

Moreover, for Hiring grants (excluding CIS) the percentage of total officers' salaries and benefits paid with Federal funds must decrease each year while the local match increases accordingly (the "decreasing Federal share" concept). For example, if the award amount were \$75,000, with a required local match of \$25,000 (based on a total entry-level salary and benefit package of \$100,000 over three years), the grantee might spend \$30,000 in Federal money the first year, with a \$3,000 local match. The following year the grantee might spend \$25,000 in Federal funds, with an \$8,000 match; the third year the remaining \$20,000 of the Federal funds would be spent, with a \$14,000 local match. As illustrated by this example, the Federal share decreased each year while the local match correspondingly increased.

An additional guideline to follow concerns the type and source of the match. The type of match must be a cash match and the source of funding may not be Federal unless specifically authorized by Federal statute. The funding for local match must be in addition to funds previously budgeted for law enforcement purposes and may not have come from other COPS grants or supplements. The grantee must be able to identify the source of their matching funds. Ideally, it is beneficial if a grantee proactively documents the specific source for and timing of the local match, such as a separate line item in the local budget.

Further, all COPS grant local matches must be paid in cash; for example, grantees may not count equipment costs outside of the programmatically approved project towards the local match. For example, if a MORE project costs a total of \$100,000 for computers, software, and installation, the applicant must pay \$25,000 of these costs (25% of total project costs) as the local match. The local jurisdiction may not substitute non-project expenditures, such as training officers on the use of equipment, as the match.

Grantees must also be able to demonstrate that they budgeted the additional funds to pay for the local match after the grant award start date or, if prior to that date, (a) in specific anticipation of receiving the COPS grant award or (b) as reserve or discretionary monies that were not otherwise budgeted for a specific law enforcement purpose, in addition to funds previously budgeted for law enforcement purposes. If the supporting documentation clearly indicates that



either of these conditions exists, the grantee may use those funds as an acceptable source for the local cash match. If the documentation cannot support a causal link between the budgeted funds and the anticipation of the grant award, or if the funds are not in addition to funds previously budgeted for specific law enforcement purposes, there is a violation of the matching funds requirement.

It should also be noted that grantees are excused from either the whole or a portion of the local cash match if the law enforcement agency has obtained a local match waiver from the COPS Office. Only a small portion of waiver requests are granted and they are considered at the time of application or post award if the community can prove severe financial distress or other severe mitigating factors. Grantees who receive a waiver should have a copy of the COPS Office's notification of the approved waiver on site with their grant records.

Examples – Acceptable Sources of Matching Funds:

- New Local Appropriations;
- State Funds: it is permissible to use State funds only if allowable by State law;
- Other Federal Funds: it is permissible to use Federal funds only if specifically; authorized by Federal statute (e.g., funds appropriated for Indian tribal governments or the Bureau of Indian Affairs (BIA) performing law enforcement functions on Indian lands; funds received through the Assets Forfeiture equitable sharing program; or funds awarded by another Federal agency whose statute specifies that those funds may be used as local match to other Federal grants)
- Other State or local Grant Funds: it is permissible to use other State or local grant funds as local match only if allowable by that particular State or local grant program
- Reserved, Discretionary, and Other Undesignated State or local funds

E. Supplanting

DEFINITION

For the purpose of COPS grants, supplanting means using COPS grant funds to replace State, local or BIA funds which otherwise would have been spent on the specific law enforcement purpose of the COPS grant award. To comply with the nonsupplanting requirement, COPS grant funds must supplement the budget of the



law enforcement agency, not replace any currently, historically, or future appropriated funds for the grant purposes. For example, COPS Hiring grant funds may not replace State or local funding for hiring sworn officers and COPS MORE funds may not replace State or local funding for purchasing equipment or technology or for hiring civilians that would have been budgeted in the absence of receiving COPS grant funding.

The nonsupplanting requirement of the COPS statute reads as follows:

Funds made available under [the COPS statute] to States or units of local government shall not be used to supplant State or local funds, or, in the case of Indian tribal governments, funds supplied by the Bureau of Indian Affairs (BIA), but shall be used to increase the amount of funds that would, in the absence of Federal funds received under [the COPS statute], be made available from State or local sources, or in the case of Indian tribal governments, from funds supplied by the Bureau of Indian Affairs. 42 U.S.C. § 3796dd-3(a)

CONDITIONS

Regardless of the type of grant, complying with the nonsupplanting requirement entails using COPS grant funds to increase the level of State, local, or Bureau of Indian Affairs funds that would be made available for the grant purposes in the absence of the grant (the "baseline" level of funding). For Hiring grants, the increased level of funding pertains to hiring new officers. For MORE grants, the level of increased funding applies to purchasing equipment and technology, hiring civilians, or, under the MORE '95 program, funding overtime.

Generally speaking, this means that grantees must (a) use their grant funds to hire officers or civilians or purchase equipment or technology after the grant award start date (unless COPS specifically authorizes the use of funds for pre-award hires or purchases) and (b) use their grant funds to increase the amount of local funds otherwise budgeted and expended for the specific grant purpose by hiring additional officers or civilians, or purchasing additional equipment and technology, and taking active and timely steps during the grant periods to fill vacancies that arise among their locally-funded sworn forces or civilian personnel.

While these general requirements apply to COPS grantees, they may still demonstrate compliance with the nonsupplanting requirement even if they (a) use funds to pay for officers or civilians hired pre-award, or equipment or technology purchased pre-award, as long as



the grantee can demonstrate that the individuals were hired, or the items purchased, in specific anticipation of receiving the grant funds (and, therefore, that no State, local, or BIA funds were already budgeted for those hires or purchases); or (b) reduce their local budgets for sworn personnel, civilians, or equipment/technology (as applicable per specific grant program), as long as the grantee can demonstrate that the reductions in State, local, or BIA funding occurred for reasons unrelated to the receipt of COPS grant funds (and therefore that no State, local, or BIA funds would have remained in the budget for those purposes even in the absence of the COPS grant).

The supplanting analysis is therefore generally a two-step process:

- (1) do facts exist that "look like" possible supplanting? (e.g., COPS funds paid to an officer or civilian hired pre-award; reductions in local funding for sworn officers during the life of an active COPS Hiring grant); if so,
- (2) can the grantee demonstrate either that (a) it would not have hired the officers or civilians, or purchased the equipment or technology, pre-award unless it had anticipated the receipt of the COPS grant because it had no State, local, or BIA funds budgeted for that purpose? (In the case of pre-award hires or purchases); or (b) it would have reduced its budget for sworn officers, civilians, or equipment/technology purchases, as applicable, for reasons unrelated to the COPS grant, even if the grant had not been awarded? (In the case of budget reductions).

If the grantee can demonstrate these circumstances, it has not violated the nonsupplanting requirement – despite the facts that may at first "look like" supplanting – because it has shown that the COPS funds did not actually supplant (replace) State, local, or BIA funds that otherwise would have been spent on those purposes.

Fact patterns which might "look like" possible supplanting violations and trigger a further review occur in four primary areas:

- Hiring sworn officers or civilians or purchasing equipment/technology, depending on the type of grant, **before** the award date of the grant.
- Delays in filling vacant locally-funded sworn officer positions or civilian positions, depending on the type of grant.
- Decreases in the baseline level of funding for sworn officers, civilians or equipment/technology during the grant period.



- Decreases in the baseline level of sworn officer or civilian positions during the grant period.

Hiring Sworn Officers or Civilians or Purchasing Approved Technology and Equipment before the Award Date of the Grant

Except for AHEAD and FAST recipients, grantees are prohibited from using COPS grant funds to pay for officers or civilians who are hired prior to the award start date of the grant without written approval from the COPS Office. AHEAD and FAST grant recipients were prohibited from using grant funds to pay for officers hired before the approved hiring start date (AHEAD: 10/1/94; FAST: 2/8/95), which differed from the start date of these awards. To obtain such approval, the grantee must provide documentation, from the time of the pre-award hiring, that proves that the additional officers or civilians were hired in specific anticipation of receiving COPS grant funds and were not otherwise funded with State, local, or BIA funds.

Acceptable forms of documentation may include (and must be dated on or about the time of the pre-award hiring):

- Internal departmental memoranda linking the hiring to the anticipated COPS grant funding;
- Governmental memoranda linking the hiring to the anticipated COPS grant funding;
- Documentation provided to the officers or civilians in question explaining that continued employment is contingent upon receiving grant funds; and/or
- Budget documentation demonstrating that the positions in question were not funded with State, local, or BIA funds (or were funded with anticipated incoming COPS grant funds)

The same provisions for hiring also apply to the purchase of approved technology and equipment before the award date of a MORE grant. If grantees acquired (or signed a binding contract to acquire) the technology and equipment that was requested on the grant application before the award date, documentation from the time of the pre-award purchase is required to prove that the purchase was in anticipation of the grant funding. The examples of acceptable documentation for Hiring grants can also be used to support the relationship between the purchased items and the anticipated grant award for MORE grants. In addition, MORE grantees may have contracts with vendors (or may be able to obtain copies of such documents from the vendors) showing that completion of the purchase was contingent upon the grantee's receipt of COPS grant funds.



Exception to Pre-Award Hiring Prohibition: Part-time to Full-time Promotions

A unique exception to the pre-award or pre-approval hiring date requirement is the promotion of a previously locally-funded (and, therefore, usually hired pre-award) part-time officer or civilian to full-time status under the COPS grant. In this circumstance, the grantee should obtain written authorization from the COPS Office for this use of funds and must hire a new officer or new civilian with local funds to backfill the vacant part-time position **before** expending COPS funds on the full-time position. COPS Hiring or MORE grant funds may not be expended on the new full-time position until the grantee has backfilled the part-time vacancy with a new hire using local funding.

If the supporting documentation, or lack thereof, reveals that the pre-award hiring or the purchase of technology and equipment was not a direct result of anticipated grant funds, but would have occurred regardless of the grant availability, or if a grantee promoted a locally-funded officer or civilian from part-time to a full-time COPS grant position, but did not "backfill" the resulting part-time vacancy with local funds, a supplanting violation has occurred.

Requirements for Written Approval

Under any "early hire" or "early purchase" situation, or promotions from a locally-funded part-time to full-time COPS-funded position, COPS grantees are required by their Grant Conditions to seek written prior approval from the COPS Office for the requested use of funds. Grantees who failed to obtain prior written approval from the COPS Office before using COPS grant funding for pre-award hires or purchases must seek a retroactive review of their use of funding to determine compliance.

Delays in Filling Vacant Locally-funded Sworn Officer Positions or Civilian Positions

COPS grantees also must take active and timely steps through their standard recruiting and hiring procedures to fill vacancies arising in their locally-funded sworn officer or civilian (depending on the type of grant) positions. Any delay in filling locally-funded vacancies must not be a direct result of receiving grant funds.



A situation independent of the grant may prevent the grantee from adhering to historical practices, such as a local hiring freeze, pending litigation, or an officer's deployment to military leave, and result in a delay in filling locally-funded vacancies. If grantees deviate from their standard hiring procedures in these or other cases, documentation should demonstrate the reasons for the deviation. If, after reviewing all pertinent documentation, the grantee has demonstrated that the delays occurred for a reason unrelated to the COPS grant, then a supplanting violation has not occurred.

If grantees do not have formal documented procedures for hiring and recruiting, historical practices may be used as evidence of standard procedures. In the situation where grantees have continued to follow those historical practices for filling vacancies in locally-funded positions during the period of the grant, the nonsupplanting requirement is met.

For grantees without formal written guidelines, the following items are examples of information that could be considered in evaluating "active recruiting and timely filling of vacant locally-funded positions":

- If the grantee typically hires replacement law enforcement officers from a civil service list of certified candidates, confirmation from the grantee or a civil service official showing that the grantee followed historical practices in requesting, reviewing, and/or interviewing from the list during the grant period;
 - If the grantee hires replacements to coincide with State, local, or law enforcement agency training academies, verification from the grantee or an academy official showing that the grantee followed similar practices after the grant award date;
 - If the grantee claims that high turnover rates make it difficult to fill all vacancies quickly, evidence from prior to the grant period showing that the high turnover rates reflect the grantee's historical hiring and attrition patterns;
 - If the grantee is filling both COPS positions and locally-funded positions, both should be filled at approximately the same rate. If a grantee fills COPS vacancies at an unreasonably faster rate, it must justify that its reasons for doing so are unrelated to the receipt of COPS grant funding.
 - To meet the timing of school years, grantees may hire new, additional officers to fill CIS-funded vacancies prior to filling locally-funded, non-school resource sworn officer vacancies, as long as the grantee is continuing to take active and timely steps to fill local sworn officer vacancies.
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The existence of locally-funded vacancies (of any number) during the grant period is not, by itself, a violation of grant requirements, as long as the grantee can demonstrate that it is taking active and timely steps to fill those vacancies or that delays in filling the positions are unrelated to the receipt of COPS grant funds.

Grantees experiencing a delay in filling locally-funded vacancies may contact the COPS Office to request written guidance on whether the delay complies with the nonsupplanting requirement.

Decrease in the Baseline Level of Funding

The goal of both the Hiring and MORE grants is to increase the "baseline" level of State, local, or Bureau of Indian Affairs funds which would otherwise be budgeted for sworn officers (Hiring grants) and civilians or equipment (MORE grants), with COPS grant funds. For the purposes of the COPS Program, the determinant for a possible supplanting violation includes both the level of funding and the level of sworn officer positions (Hiring grants) and civilian positions (MORE grants).

To determine the baseline level, the State, local, or BIA funding for sworn officer or civilian positions (depending on the type of grant) and number of sworn officer or civilian positions must be measured as of each grant's threshold review date. (See Appendix C for the applicable review date for each type of COPS grant.) This level should be reviewed for each fiscal year during the grant period to determine whether any additional State, local, or BIA funding was budgeted for additional positions after the original threshold date. If the baseline funding increased during the grant period, the highest documented level of State, local, or BIA funding or positions for sworn officers or civilians should be used as the new baseline level from that date forward during the remainder of the grant and retention periods.

If, during the grant period, the State, local, or BIA baseline level of funding or number of sworn officer or civilian positions has decreased, the grantee must be able to demonstrate (with supporting documentation) that the reduction in funding or force occurred for a reason unrelated to the receipt of COPS funding (such as fiscal distress, civilianization of sworn positions, or a management reorganization unrelated to COPS) to comply with the nonsupplanting requirement. Acceptable forms of supporting documentation may include, but are not limited to:



- State, city or county council meeting minutes;
- Internal departmental budget directives;
- Internal law enforcement agency documents;
- Independent management studies recommending reductions;
- Documentation for other local agencies outlining budget reductions; and
- Evidence that, although the number of baseline officer positions may have decreased during the grant period, the level of State, local, or BIA funds for those positions did not decrease (as a result of increasing officer salary costs, for example, or because fewer part-time officers were assigned to cover hours previously worked by a higher number of part-time officers)

Impact of Failure to Retain on Supplanting Analysis

An agency, with multiple COPS Hiring grants, which fails to retain officer positions following the expiration of one Hiring grant, may be in violation of the nonsupplanting requirement on its later Hiring grants for an unjustified reduction in baseline officers. For example, a failure to retain, one (1) COPS FAST officer position, which otherwise would have been retained with local funding, may result in an unapproved baseline reduction for the active UHP grant, since the retained COPS FAST officer position should have **increased** the UHP grant baseline by one position. To comply with the nonsupplanting requirement, the grantee must demonstrate that the failure to retain the FAST officer position with State, local, or BIA funds, upon grant expiration, occurred for reasons unrelated to the UHP grant.

If the grant award is for part-time officers or civilian support services, the baseline funding level analysis is still applicable. However, due to the generally more frequently fluctuating number of part-time officer or civilian positions, a supplanting analysis should always include an evaluation of the overall amount of State and/or local funds budgeted and expended on part-time sworn officer or civilian law enforcement coverage (rather than simply the number of part-time positions).

It is important to note that a nonsupplanting violation only occurs if a grantee reduces its locally-funded law enforcement budget (and corresponding number of positions) as a direct result of receiving COPS funding. To verify compliance, grantees are required to demonstrate that any reduction in local funding for sworn officers and civilians, or a reduction in the number of sworn officer and civilian positions, is unrelated to the receipt of COPS funds.

Examples – Supplanting Situations:

- Grantee delays filling locally-funded vacancies as a result of receiving COPS funds for additional sworn officers (or civilians, depending on the grant).
- Grantee reduces its budget of State, local, or BIA funds for sworn personnel (or civilians, depending on the grant) as a direct result of receiving COPS funds.
- Grantee fails to retain an officer on an early Hiring grant while implementing other active Hiring grant(s), resulting in a failure to increase its locally-funded baseline (by the retained position) for the active grant(s).

F. Reporting

DEFINITION

Two types of reports are required from grantees: 1) Program Progress Reports; and 2) Financial Status Reports. Reports are survey instruments that the COPS Office uses to monitor grants. For Hiring grants, these Progress Reports request information about the status of the grant in terms of selection, hiring and training; characteristics of the officers hired; descriptions of officer activities; and general information about the department. The MORE Program requires submission of one MORE Progress Report detailing background information on the department, equipment and technology purchasing and information on civilian hiring. The Financial Status Reports (required of both Hiring and MORE grantees) request information on monies spent, including amounts for Federal expenditures, local matching contributions, and the unobligated balance of the award.

The type of Program Progress Reports required depends on the type of grant award. During the period of December 1999 to November 2003, the Hiring grants (except CIS) required two reports: 1) Department Initial Report; and 2) Department Annual Report. Effective November 1, 2003, the Department Initial Reports were discontinued. Currently, the Hiring grantees are required to submit Department Annual Reports. The CIS program does not require a Department Initial Report and may require less frequent submission of the Department Annual Reports. The MORE grants require only one Progress Report.



CONDITIONS

The type of progress reports required depend on whether the grant is COPS Hiring or MORE. Financial Status Reports require the same format for all grants. Grantees are required to complete the Financial Status Reports for every quarter of the active grant period even if the grant has been in effect for only a portion of the reporting period and no money has been drawn down.

Department Initial Report: Hiring. Grants awarded between December 1999 to November 2003 were required to submit a Department Initial Report if the department has never previously received a COPS Hiring grant. Only one report is required per agency for the life of the grant. The exception to this is for agencies that have received both a Phase I and other Hiring grant(s). If this is the case, the department was required to submit one Department Initial Report for the Phase I grant and is also required to submit a separate one for the other Hiring grant(s) (except for the CIS program, which does not require an Initial Report as well as Hiring grants awarded after November 2003). This report solicits information regarding pre-grant data, which serves as a baseline for measuring the grantee's future progress in community policing. Information gathered addresses the grantee's training curriculum, demographics of police force, and community policing activities. The Department Initial Report also collects information about a department's actual and budgeted number of locally-funded officers.

A hard copy of the Department Initial Report is sent to all UHP grantees within 30 days of receiving an award packet if a grant is awarded for the first time. The report is due back to the COPS Office within 45 days of receipt of the award packet by the grantee.

As noted above, the CIS grant program and the Hiring grant program after November 2003 does not have an Initial Report requirement.

Department Annual Report: Hiring. The Department Annual Report (DAR) solicits information concerning the status of the implementation of the grant. Questions on this report include demographics of police force, retention plans, and community policing programs and activities.

A hard copy of the Department Annual Report is mailed to all grantees with an active UHP grant. (As noted previously, the CIS program may require less frequent submission of the Department Annual Report.) Department Annual Reports are mailed in December



of each year, for the reporting period covering January 1 - December 31, throughout the life of the grant. These reports are due in February of each year.

COPS Count. During the survey, a sample of COPS MORE grant recipients are contacted by the COPS Office and asked for information regarding the status of their grants as of a selected date. This survey information is then summarized and compared with the total number of civilians and equipment funded as of the same selected date. Specific survey information includes; updates on the status of grant funded civilian personnel and equipment as well as redeployment dates and related questions for MORE grants; and grantee plans concerning future hiring of civilians and redeployment.

Progress Report: MORE. The MORE Progress Report requires the grantee to provide information about the enhanced levels of community policing that have resulted from the purchase of equipment and/or the hiring of civilian personnel funded under the COPS MORE Grant Program. The information from this report will be used to monitor each grantee's progress and to provide summary data on the project supported with COPS MORE funding.

The report must be completed by the grantee even if it has not hired the civilian personnel or purchased the equipment awarded under the COPS MORE Program. The reports are mailed approximately 12-18 months after the original award start date. These reports are to be returned within 45 days of their receipt.

Financial Status Reports. All COPS grantees are required to submit quarterly Financial Status Reports (FSRs) using a Standard Form 269A (SF-269A). This report reflects the actual federal monies and unliquidated obligations incurred, local matching contributions, and the unobligated balance of federal funds.

COPS grantees are encouraged to submit their FSRs online. Effective June 1, 2004, the COPS Office discontinued sending preprinted blast faxes of SF-269As to grantees, due to the ability to submit online. While grantees are encouraged to submit their SF-269As through the web-based system, we will continue to accept SF-269 through the Control Desk by mail and fax. The fax number for the Financial Status Reports Control desk is (202) 616-9004. Mailed reports should be addressed to the U.S. Department of Justice, Financial Status Reports Control Desk, 1100 Vermont Avenue, NW 6th Floor, Washington, D.C. 20530.



FSRs must be submitted no later than 45 days after the last day of each quarter as follows:

Reporting Quarter	Date Due
Jan 1 - Mar 1	May 15
April 1 - June 30	Aug 14
July 1 - Sept 30	Nov 14
Oct 1 - Dec 31	Feb 14

This report requests information on total monies spent, the breakdown by Federal expenditure and local match, and unobligated amounts. All Financial Status Reports must be completed and sent to the COPS Office no later than 45 days following each calendar quarter. Grantees who do not submit a SF-269A by the due date will be unable to drawdown funds. The payment systems contain an edit that checks for SF-269A delinquency and will reject a drawdown attempt if the report is not up to date.

For general information concerning on-line filing of a SF-269A reports, go to www.ojp.usdoj.gov/oc or contact the COPS Office Response Center by phone at 800.421.6770 for additional technical assistance or by e-mail at askCOPSRC@usdoj.gov.

Final Reports. Final programmatic reports are intended to capture the history of the grant and ensure completion of the required project. Hiring and MORE grantees are required to submit final programmatic reports and final Financial Status reports to the COPS Office so that COPS may officially close out the grant award. Final Financial Status Reports should reflect the total amount of Federal expenditures, total amount of matching contributions, and the amount of unobligated funds, if any. Any unobligated or unspent funds must be returned to the COPS Office and will be deobligated from the award amount.

G. Training: A Special Condition for CIS Grantees

DEFINITION

COPS in Schools (CIS) Grantees

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.

Notification of this added grant condition is sent to the grantee with the grant award. Departments are encouraged to attend the training in



the early stages of the grant, but, in all cases, departments must complete their training by the end of the grant award period.

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. Since this is a team-based training, it is encouraged that both the school administrator and the SRO(s) attend the training together; however, the COPS Office recognizes the difficulty in scheduling such an event. Therefore, as long as both the SRO(s) deployed into the school and the representing school administrator each attend a training session sponsored by the COPS Office prior to the end of the grant period, the grant recipient is in compliance with this training condition.

Only the training sponsored by the COPS Office will satisfy this additional grant condition. The COPS Office Grants Administration Division reserves the right to approve all participants to ensure proper representatives attend the training, thereby satisfying the grant condition. Costs, including training, per diem, travel and lodging, up to a maximum of \$1,200 per trainee, will be reimbursed to the grantee by the COPS Office.

H. Timesavings for Redeployment

DEFINITION

Timesavings for redeployment applies to the MORE Grant Programs. Redeployment occurs when sworn officers, currently employed by the grantee law enforcement agency, become available to participate in community policing as a direct result of the timesavings achieved by the purchase of technology or equipment or the hiring of civilian support staff.

Prior to the MORE 2002 program, all MORE grantees were required to demonstrate their compliance with this requirement by formally tracking the officer full-time-equivalent hours ("officer FTEs") redeployed into community policing as a result of the MORE project. Redeployment of officer FTEs applies to sworn officers, currently employed by the grantee, who will be able to enhance community policing activities as a direct result of the timesavings resulting from the purchase of the technology, equipment, overtime, or support services. Some MORE grantees with overtime and civilian hire grants received funding renewals for an additional 12 or 24 months and were required to demonstrate continued timesavings and redeployment of



officers during the renewal funding periods. As of the MORE 2002 program, formal tracking of redeployment is no longer required, though MORE 2002 grantees are still expected to redeploy sworn officers into community policing as a result of the timesavings generated by the MORE-funded project.

CONDITIONS

To meet the redeployment grant condition, applicants must ensure that the timesaving for redeployment that results from COPS MORE funding, enhances community policing activities.

- Agencies funded prior to fiscal year 2002 (MORE 2001 and previous programs) must track timesavings and the redeployment of FTEs into the community policing program after full implementation to demonstrate that, as a result of the grant award, community policing is being enhanced; however, there is no requirement to track every hour of time saved to every hour of community policing.
- Agencies funded in fiscal year 2002 and later (MORE 2002 and any later programs) are not required to track timesavings and redeployment formally, but still must ensure that the officer timesavings resulting from the grant project is enhancing community policing.

The timesavings for redeployment results from the purchase of: 1) technology or equipment; 2) civilians; and 3) overtime (for the MORE '95 program only). Technology or equipment timesavings are the amount of officer's time that the technology or equipment frees up by its use. Civilian timesavings are the amount of time saved by an officer whose position is filled by a newly hired civilian. Overtime timesavings (for the MORE '95 program only) resulted from paying currently employed sworn officers overtime compensation for working additional hours beyond the normal workweek to engage in community policing activities.

Each MORE grantee's specific FTE redeployment requirement is located on the award document. The COPS Office standard for a full-time-equivalent sworn officer equals 1,824 hours. The COPS Office recognizes that, due to differences in shift hours, there may be slight variances in the number of officers redeployed between a grantee and the COPS Office standard formula for calculating redeployment.

Tracking Timesavings: MORE 2001 and Previous MORE Programs. Agencies granted an award under the MORE 2001 Program and all previous MORE programs are required to plan and



track timesavings for redeployment realized from the equipment, technology, civilians, or overtime (only for MORE '95 recipients) awarded. (This tracking requirement does not apply to the MORE 2002 and any subsequent MORE programs, although those grantees must still ensure that the officer timesavings resulting from the grant project, is enhancing community policing through redeployment.)

Once the grant is implemented and fully operational (i.e., technology and equipment is purchased, installed and operational, or civilians have been hired) as determined by the law enforcement agency, these grantees must complete a timesavings tracking plan. This tracking plan describes the grantee's methodology for measuring the timesavings for each item, system or group of like items requested and received by the grantee.

For equipment/technology awards, actual tracking, pursuant to the plan, will begin after such single stand-alone, independent element, function, or operation in a geographic area is fully implemented as contained in the plan. For civilian awards, tracking should begin once the employee or employees have been trained and the sworn officers redeployed. Tracking must continue for at least one full year from the date that the grant project is implemented and declared fully operational. This 12-month period is necessary for the agency to achieve the total timesavings required by the one-year MORE grant program.

Information on developing and implementing redeployment tracking plans may be obtained from a COPS grant program specialist or can be found on the COPS MORE Home Page at www.cops.usdoj.gov.

No one method to track timesavings can adequately cover all situations and all jurisdictions because each jurisdiction varies in size and each situation varies in complexity. Tracking methods can vary from estimating hours saved to directly tracking hours. The tracking method for timesavings should, at least, demonstrate the time that was spent on duties prior to the grant award (without the additional grant-funded equipment or technology or civilian personnel) and how much time is spent on those same duties after the grant award when the grant-funded equipment or technology or civilian personnel are operational. To assist with tracking redeployment, grantees can use baseline time data prior to grant implementation.

All MORE 2001 and previous MORE grantees must maintain the details of worksheets, studies, or any other written evidence that was used to track timesavings. These grantees may be required to produce redeployment tracking plans and supporting timesavings tracking documentation during any monitoring or audit site visits.



Sworn officers who are redeployed into community policing under a MORE grant should be aware of the community policing activities that are part of the local department's strategy. These are the activities that officers should carry out as a result of time saved. Timesavings should initiate or enhance community policing activities that have been approved through the grant program; however, not every hour of timesavings needs to be committed to a specific "community policing activity."

Elements of a Tracking Plan. Tracking plans must include a statement explaining how time is being saved, as well as an explanation of the tracking method used. Also, plans should include the method used to track timesavings (estimation, direct tracking sample, study, etc.), the hours to complete the activity before and after the equipment or technology or civilian personnel are implemented, and a short description of enhanced community policing activities resulting from the timesavings. Finally, the plan should include an explanation of how the time saved through this grant will allow the agency to enhance its community policing efforts.

Once fully operational, and timesavings has been tracked, a determination can be made about the actual total hours saved. (For examples of tracking timesaving, see Appendix D.) It should also be noted that a grantee is required to meet the Full-time Equivalencies (FTEs) as demonstrated on their award document.

To demonstrate compliance in reaching required levels of redeployment, grantees must demonstrate satisfactory progress in implementing their COPS MORE grants. (The following is true of any grant, not just MORE.) Unjustifiable delays in grant implementation may result in a finding of noncompliance (and possibly termination of the grant award) if grantees are unable to document satisfactory progress in implementing the grant program (e.g., by documenting the time line of a lengthy procurement process).

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

VI. COPS Performance Indicators

VI. COPS Performance Indicators

This section presents a checklist of performance indicators that can be used as a guide in determining whether COPS grantees are in compliance with the terms and conditions of the Hiring and MORE grant awards within each of the eight primary compliance categories. Performance indicators present characteristics that are used to measure the results of the COPS Program activity compared to its intended purpose and compliance requirements.

In general, written evidence that grantees are complying with grant requirements is always required. Consequently, copies of **all** grant-related documentation should be kept at local law enforcement agency or executive government offices.

Significant changes to approved grant projects must be submitted in writing to the COPS Office for prior approval. Significant changes may include, but are not limited to:

- Changes in number of officers that will be hired;
- Extensions;
- Salary and benefit changes;
- Changes in redeployment levels;
- Changes in the type of equipment purchased;
- Purchase of additional items for a MORE redeployment grant that was the result of cost savings in excess of \$1,000;
- Significant changes in community policing plans not within the scope of the original approved plan;
- Use of grant funding for officers or civilians hired pre-award;
- Use of grant funding for equipment or technology purchased pre-award; and
- The transfer of a locally-funded part-time position to a full-time COPS-funded position.

While interpreting the eight compliance categories as to whether the terms and conditions of the COPS grant awards have been met, the intent of the program should be kept in mind. The overall intent of the COPS grant program is to help develop an infrastructure that will institutionalize and sustain community policing after Federal funding has ended and that would not have existed in the absence of the COPS grants. The ultimate goal of incorporating community policing is to improve public safety through better police work, while increasing the public's interaction and satisfaction with police services.



The checklist is grouped by the eight compliance categories, which are further subdivided by several performance standards. Performance standards represent distinct statements for each compliance category that together comprise a complete definition of each goal. Each standard is accompanied by a list of indicators that can be used to help evaluate compliance within each category. Comments are available for each standard to provide additional information about the performance indicators; for more detailed explanations, refer to Section V of this Guide.



A. Community Policing

GOAL: Law enforcement activities executed under the grant program qualify as community policing.

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 21-28 for a complete explanation of Community Policing.		
<p><u>Hiring and MORE Grants:</u> Local law enforcement agencies use grant funds to begin or enhance their community policing efforts.</p> <p>Grant funds under the COPS in Schools (CIS) Grant Program are used to fund School Resource Officer positions, building working relationships with schools to use community policing efforts to combat school violence.</p>	<p>Community policing activities actually executed by the local law enforcement agency are generally the same as the activities identified in the approved grant application, or any significant changes have been approved by the COPS Office in writing.</p> <p>Under the CIS Grant Program, grant-funded officers (or an equal number of veteran officers) 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 COPS in Schools award from pre-grant activities.</p>	<p>Any significant changes to the community policing activities identified in the grant application must be submitted in writing to the COPS Office for approval.</p>
<p><u>Hiring Grants:</u> Local law enforcement agencies use grant funds to deploy newly hired officers, or an equal number of veteran officers, to initiate or enhance community policing activities.</p> <p><u>MORE Grants:</u> Time savings from MORE grants result in enhanced community policing activities.</p>	<p>Evidence of an agency's compliance with community policing activities may include, but is not limited to, the following:</p> <ul style="list-style-type: none"> · Conducting some or all Community Policing activities identified in application. Working with citizen advocacy groups, and/or meeting with community groups and businesses to address local crime problems. · Participating in crime analysis. · Establishing crime prevention or drug prevention programs or participating in prevention efforts. · Performing bike or foot patrols. · Working with other government agencies to address crime and disorder problems. · Having a written strategic plan for community policing. · Offering or attending training in community policing. · Incorporating community policing into performance evaluations. · Decentralizing decision-making authority. · Assigning officers to a geographic beat to encourage community-police relations. · Establishing community partnerships. · Performing problem-solving activities. · Responding to specific community needs. · Establishing youth programs and activities. · Incorporating the use of volunteers into police work. 	<p>One or more of these indicators may be evidence that the local law enforcement agencies are using awards consistent with community policing.</p> <p>For more information, please see Chapter V, Section A.</p>



B. Retention

GOAL: Additional positions and/or the level of redeployment funded under the grant program are retained with State or local funding at the conclusion of the grant program for at least one full local budget cycle.⁴

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 28-32 for a complete explanation of Retention.		
<p><u>Hiring Grants:</u> All Hiring grantees (except Phase I grantees) are required to retain the additional officer positions with State or local funding for a minimum of one full local budget cycle following the end of the 36-month funding period for each position.</p> <p><u>MORE Grants:</u> Grantees must plan to retain the federally funded technology/equipment and/or civilians⁵ and the resulting redeployment after the required level of redeployment⁶ has been met for a minimum of one full local budget cycle following the 12-month grant implementation period.</p>	<p><u>Hiring Grants:</u> <i>As of June 16, 1998, retention plan documentation must be submitted with the grant application</i> One or more of the following may verify compliance:</p> <ul style="list-style-type: none"> Written assurance is submitted with the grant award application that State and local agencies will plan to seek local or State funding to retain the COPS-funded officer position(s). Certification in the application that states grantees understand and will abide by their submitted plans. Written assurance is submitted with the Department Annual Reports that states how local agencies are planning to seek local or State funding to add officer positions to their local budgets or maintain the level of redeployment after the COPS grant ends. Grantees that received awards prior to June 16, 1998 can provide other evidence of retention planning efforts upon request. <p><u>MORE Grants:</u> One or more of the following may verify compliance:</p> <ul style="list-style-type: none"> Retention statement is submitted with the MORE '98 and 2000 grant award application that State and local agencies will plan to seek local or State funding to retain the level of redeployment after the required level of redeployment has been met. Written assurance is submitted with the MORE Progress Report that states how local agencies are planning to seek local or State funding to maintain the level of redeployment after the required level of redeployment has been met. Grantees that received MORE grant awards prior to MORE '98 can provide other evidence of retention planning efforts upon request. 	<p>Retention planning means that grantees must enter the three-year Hiring grant program or, for MORE, the one-year grant period, with the understanding that they are required to seek State or local funding to add these positions to their local budgets and/or maintain the level of redeployment after the COPS grant ends.</p> <p>Requirement to submit retention plan documentation with the Hiring grant application was effective June 16, 1998. The plan also includes supporting materials. Grantees applying for funds prior to June 16, 1998, are required to maintain evidence of their retention planning efforts for submission to the COPS Office upon request.</p> <p>Supporting retention planning evidence may include memoranda, minutes of meetings, and/or other planning documents during the grant period.</p>

⁴ There are two exceptions to this general rule. The Phase I grant conditions did not include a retention requirement and MORE '95 overtime grantees are required to plan to continue the proposed overtime activities funded under COPS MORE.

⁵ MORE '95 overtime grantees are required to plan to continue the proposed overtime activities funded under COPS MORE.

⁶ In this document the required level of redeployment is used generically, referring to the level of redeployment grantees must reach to be in compliance with their grant terms and conditions. See Appendix A for more information about the required level of redeployment for specific MORE grant programs.

**Retention, continued**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 28-32 for a complete explanation of Retention.		
<p><u>Hiring Grants:</u> Retention of officer positions is maintained for one full local budget cycle after the Hiring grant funding period⁷ ends.</p> <p><u>MORE Grants:</u> Retention of the federally funded technology/ equipment and/or civilians and the resulting redeployment is maintained for one full local budget cycle after the required level of redeployment⁸ has been met.</p>	<p><u>Hiring Grants:</u> Additional officer positions are retained with State or local funds, over and above the level of locally-funded officer positions that would otherwise exist, for at least one full local budget cycle after the 36-month Hiring grant funding period for each position ends.</p> <p><u>MORE Grants:</u> Grantees retain the level of redeployment (as a result of retaining the additional civilians and/or equipment and technology) for one full local budget cycle after achieving the required level of redeployment.</p>	<p>Regardless of when during the local budget cycle the grant funding period ends, the grantee must immediately retain officer or civilian positions and/or level of redeployment through the end of the next full local budget cycle.</p> <p>Mitigating circumstances may justify an exemption from the retention requirement.</p>

⁷ The Phase I grant conditions did not include a retention requirement. See Appendix A for a definition of the Hiring grant funding period.

⁸ In this document the required level of redeployment is used generically, referring to the level of redeployment grantees must reach to be in compliance with their grant terms and conditions. See Appendix A for more information about the required level of redeployment for specific MORE grant programs.



C. Allowable Costs

GOAL: Allowable costs under each COPS Program must be specifically authorized under the specific grant conditions and in the grantee's approved award.

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 32-38 for a complete explanation of Allowable Costs.		
<u>Hiring Grants:</u> Recruited and hired required number of COPS-funded officers.	Supporting documentation verifies that positions filled since grant was awarded agree with the approved costs for hiring officers, as identified in the COPS grant award.	The grantee may recruit or hire, using COPS funding and following historic local practices, only the number of officer positions agreed upon in the approved grant award.
<u>Hiring Grants (except CIS grants):</u> Requested reimbursement for 75% of entry-level salary for an officer, including benefits, for duration of grant. The maximum amount per officer is \$75,000 unless the COPS Office has granted a waiver.	One or more of the following may verify compliance <ul style="list-style-type: none"> · Hiring confirmation paperwork with the offered and accepted salary, including benefits, available for review. · Documented entry-level salary, including benefits, available for review. · Drawdown request agrees with 75% of department documented entry-level salary and benefits package for officers over three years. 	Only 75% of an officer's entry-level salary, including benefits, may be funded under the Hiring grant programs with a cap of \$75,000 over three years (unless a waiver has been granted). The remaining 25%, any costs over the cap, and any costs for salaries and benefits above entry-level must be paid by local funding. Furthermore, the percentage of total officers' salaries and benefits paid with federal funds must decrease each year of the grant, with the local match correspondingly increasing.
<u>Hiring Grants:</u> Officer positions funded as full-time positions are filled with officers working full-time and positions funded as part-time are filled with officers working part-time.	Supporting documentation is available detailing that COPS-funded officers are, in fact, working either full time or part time, in accordance with the grant award.	Hiring grants can be awarded for either full-time or part-time positions. Depending on the type of grant award, the officer must work either full or part time to justify salary and benefit costs.

**Allowable Costs, continued**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 32-38 for a complete explanation of Allowable Costs.		
<p><u>Hiring Grants:</u> If a previous part-time officer was promoted to full-time under a COPS grant, then COPS monies were only expended on the full-time COPS position after the vacant part-time position was filled using local funding.</p>	<p>One or more of the following may verify compliance:</p> <ul style="list-style-type: none"> · Paperwork associated with hiring new officers confirms that a replacement part-time officer was hired with local funding. · Department budget and payroll accounts verify that promoted (previously part-time) officer was not paid salary and approved benefits from COPS monies until the part-time replacement was hired with local funds. 	<p>The law enforcement agency is required to hire new, additional part-time officers with local funds to replace any previously employed part-time officers who were promoted to full-time status under a COPS grant. The grantee may not use COPS monies to pay for the salary and approved benefits costs of the promoted part-time officer until a replacement part-time officer has been hired with local funds.</p>
<p><u>CIS Grants:</u> Provides a designated portion of the entry-level salary and benefits over the three-year grant period, not to exceed \$125,000. (Any additional salary or benefits must be paid by State or local funds.)</p>	<p>One or more of the following may verify compliance:</p> <ul style="list-style-type: none"> · Hiring confirmation paperwork with the offered and accepted salary, including benefits, available for review. · Documented entry-level salary, including benefits, available for review. 	<ul style="list-style-type: none"> · No waivers of the \$125,000 cap on Federal funding are offered under the CIS Program.
<p><u>MORE Grants (Civilians):</u> Requested payments for civilian support services extend over the allowable period.</p>	<p>Copy of grant award and any approved renewals or extensions, if applicable, which specify allowable costs.</p>	<p>MORE grants are awarded for one year only, with renewal available for up to two years after the initial grant period ends for civilian hires and overtime (MORE '95), at the discretion of the COPS Office, and subject to funding availability.</p>
<p><u>MORE Grants (Equipment/Technology):</u> Requested reimbursement for authorized technology/equipment</p>	<p>Copy of approved grant award, which specifies technology and/or equipment allowable costs.</p>	<p>The grantee may only request reimbursement for those items approved by the COPS Office on the approved grant award.</p>

**Allowable Costs, continued**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 32-38 for a complete explanation of Allowable Costs.		
<u>MORE Grants:</u> Cost of purchased technology/ equipment is within parameters as stated on the approved award, or as subsequently modified by the COPS Office.	One or more of the following may verify compliance: <ul style="list-style-type: none"> · Purchase requests and payment receipts for each item purchased available for review. · Copy of approved grant award confirms allowable items. 	The approved grant award specifies the amount awarded for the cost of each approved item. It should be noted that it may be permissible to obtain additional items in support of the MORE grant as a result of cost savings. Please see Chapter V, Section D, for more details.
<u>MORE Grants:</u> Requested reimbursement for 75% of salary, including benefits, for a civilian hire for the duration of grant.	One or more of the following may verify compliance: <ul style="list-style-type: none"> · Hiring confirmation paperwork with the offered and accepted salary, including benefits, available for review. · Documented salary level, including benefits, available for review. · Reimbursement request agrees with 75% of department documented salary and benefits package for the awarded type of civilian support services. 	Only 75% of a civilian hire's salary, including benefits, may be funded under the MORE grants throughout the duration of the grant. Local funding must pay the remaining 25% (unless the COPS Office grants a waiver).
<u>MORE Grants:</u> Time spent working on support service activities is equivalent to full-time or part-time service, in accordance with the grant award.	Supporting documents detailing either time spent working on support activities or attendance records is equivalent to full-time or part-time service, in accordance with the grant award.	MORE civilian grants can be awarded for either full-time or for part-time positions. Depending on the type of grant award, civilian hire must work either full-time or part-time to justify the salary and benefit costs.
<u>MORE Grants:</u> If a previous part-time civilian was promoted to full-time under a COPS grant, then COPS monies were only expended on the full-time COPS position after the vacant part-time position was filled using local funding.	One or more of the following may verify compliance: <ul style="list-style-type: none"> · Paperwork associated with hiring a new civilian confirms that a replacement part-time civilian was hired with local funding. · Department budget and payroll accounts verify that the promoted (previously part-time) civilian was not paid salary and approved benefits from COPS monies until the part-time replacement was hired with local funds. 	The law enforcement agency is required to hire new, additional part-time civilians with local funds to replace any previously employed part-time civilians who were promoted to full-time status under a COPS grant. The grantee cannot use COPS monies to reimburse the salary and approved benefits costs of the promoted part-time civilian until a replacement civilian has been hired with local funds.



D. Source and Amount of Matching Funds

GOAL: Grantee contributes at least 25% (unless granted a waiver) of the costs of the program, project, or activity that is funded by the COPS Program.

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 38-41 for a complete explanation of Source of Matching Funds.		
<p><u>Hiring Grants:</u> The grantee matched, or intends to match, the required percentage for the approved hiring costs.</p>	<p>One or more of the following may verify compliance:</p> <ul style="list-style-type: none"> · Copy of approved grant award specifies agreed upon costs and percentage of match. · Copy of departmental budget confirms the intention of the grantee to pay the match, or budget confirms that match has already been paid. · Copy of departmental budget or other documents reflect the source, timing, and amount of match. 	<p>The COPS grant will provide for UP TO 75% over three years with a maximum of \$75,000 for an entry-level officer's salary and fringe benefits package. The grantee must cover AT LEAST 25% of the costs, unless the COPS Office has granted a waiver.</p> <p>The CIS Grant Program will cover up to a maximum amount of \$125,000 for salary and benefits. Any costs over the maximum award must be paid by local or State funding.</p>
<p><u>MORE Grants:</u> The grantee matched, or intends to match, the required percentage for the approved costs for the hiring of civilian support services and technology and equipment purchases.</p>	<p>One or more of the following may verify compliance:</p> <ul style="list-style-type: none"> · Copy of grant award specifies approved costs and percentage of match. · Copy of departmental budget confirms the intention of the grantee to pay the match, or budget confirms that match has already been paid. 	<p>The COPS grant will provide for UP TO 75% of a civilian hire's salary and fringe benefits package throughout the duration of the grant, including renewal periods if applicable. The grantee must cover AT LEAST 25% of the costs, unless a waiver has been granted by the COPS Office</p> <p>The grantee must pay AT LEAST 25% of all technology and equipment purchases (unless a waiver has been granted) while the COPS grant will contribute UP TO 75%.</p>

**Source and Amount of Matching Funds, continued**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 38-41 for a complete explanation of Source of Matching Funds.		
<u>Hiring and MORE Grants:</u> The type of the match is cash	Payment receipts, budgets, payroll or other documents are utilized to support the type and source of the cash match.	The source of the match must be cash and cannot be satisfied through "in kind" purchases or contributions.
<u>Hiring and MORE Grants:</u> The source of the cash match is State, local, or Federal funds if specifically authorized by Federal statute. Grantee must verify and document approved source.	Department budget and payment receipts, or other documentation, verify source of the cash match is State or local funds, or Federal funds if such use is specifically authorized by Federal statute.	Source of cash match must be State or local funds. Other Federal funds may only be used as the cash match if such use is specifically authorized by Federal statute. The funds may not have come from other COPS grants or grant supplements.
<u>Hiring and MORE Grants:</u> Source of match was not previously budgeted for other law enforcement purposes.	Department budget, general ledger, payment receipts, or other documents verify that the source of the match was not specifically budgeted for other law enforcement needs.	The source of the cash match must be in addition to funds previously budgeted for law enforcement purposes.
<u>Hiring Grants:</u> The local contribution share increases each grant year while the Federal share decreases.	Department budget, general ledger, or other documentation verifies that the Federal contribution is decreasing, while the local contribution is increasing each grant year.	As a percentage of the total annual project costs, the local share must increase each year during the grant period, and, conversely, the Federal share must decrease.
<u>Hiring and MORE Grants:</u> Cash match was paid in full before the grant period ended.	One or more of the following may verify compliance: <ul style="list-style-type: none"> · Copy of approved award, including any approved no-cost extensions, specifies the end of the grant period. · Copy of department's budget, general ledger, payroll or other documentation verifies payment of match before the end of the grant award period. Or, if applicable, a copy of a waiver verifies that the grantee is excused from the entire match or a portion of the match. 	The cash match must be fully paid before the end of the grant award period. The grantee is excused from either the whole, or a portion of, the local cash match if the department has obtained a waiver.

**Documentation of the Local Match**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 38-41 for a complete explanation of Source Matching Funds		
<u>Hiring and MORE Grants</u> Grants should have documentation showing the source of their cash matching funds.	Department budget, general ledger, or other documents verifying that the Federal contribution has been budgeted for and expended.	Verification of local match funding must be available for review during the life of the grant.



E. Supplanting

GOAL: COPS grant funds are used to supplement the budget of the law enforcement agency, not replace any funds which would have been budgeted for the grant-funded purpose in the absence of the grant.

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 41-49 for a complete explanation of Supplanting.		
<p><u>Hiring Grants:</u> The COPS funding increased the baseline level of funding for sworn officers and, concurrently, the baseline level of sworn officer positions.</p> <p><u>Hiring Grants:</u> Grantee followed standard procedures used to recruit and hire part-time and full-time locally-funded officer vacancies in a timely and active manner during the life of the grant.</p>	<p>Copy of department and local government budget reflects no decrease in State, local, or Bureau of Indian Affairs funds for sworn personnel during each fiscal year of grant implementation.</p> <p>Or, if the baseline level of funding for sworn officers, or the number of sworn officer positions, decreased, copies of department and local government budgets and other supporting documentation verify that the decrease occurred for reasons unrelated to receiving the grant award.</p> <p>One or more of the following will verify compliance:</p> <ul style="list-style-type: none"> · Copy of standard recruiting and hiring procedures compared to grantee's actions in filling vacancies during the grant period confirms grantee has not delayed in filling locally-funded positions. · If there are no formal written procedures, review of historic hiring practices support grantee's compliance with actively trying to fill locally-funded positions in accordance with its standard practice. · Copy of civil service list and the grantee's or civil service officer's confirmation that historical hiring practices are being followed. · Copy of State, local or law enforcement training academy schedule verifies grantee's intent to fill, or actual filling of, locally-funded positions in conjunction with training schedules. · Documented high turnover rate for department supports grantee's explanation for delay in filling vacant positions. · Rate that both COPS-funded vacancies and locally-funded vacancies are filled is approximately the same or the grantee evidences that this did not occur for reasons unrelated to receipt of grant funding. · If grantee fills CIS-funded vacancies prior to filling locally-funded, non-school resource officer vacancies so that it may timely deploy new School Resource Officers during the school year, it also continues to take active and timely steps to fill locally-funded vacancies. 	<p>The goal of the grants is to increase the "baseline" level of State, local, or Bureau of Indian Affairs funds that would have been budgeted for sworn officers in the absence of COPS funding.</p> <p>If there is a decrease in the baseline funds for officers, or level of officer positions, during the life of the grant, grantees must show that the decrease occurred for reasons unrelated to the award of grant funding. If the decrease occurred because the grantee received COPS grant funding, a supplanting violation exists.</p> <p>Hiring grantees must take active and timely steps through their standard recruiting and hiring procedures to fill all locally-funded officer vacancies that arise during the grant period. To determine if the grantee has continued its standard recruiting and hiring practice, various factors must be reviewed. Because of the unique recruiting and hiring practices of each agency, discretion and flexibility is allowed.</p>

**Supplanting, Continued**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 41-49 for a complete explanation of Supplanting.		
<p><u>Hiring Grants:</u> Grantee delayed in following standard procedures used to recruit and hire locally-funded part-time and full-time officer vacancies after the award of grant money for reasons unrelated to the receipt of grant funding.</p>	<p>Supporting documentation verifies the delay in filling locally-funded part-time and full-time officer vacancies occurred for reasons unrelated to grant funding. Following are examples of reasons that are most likely unrelated to the receipt of grant funding:</p> <ul style="list-style-type: none"> · Fiscal Distress; · Training Classes delayed; · State civil service list is suspended; and · City council minutes discussing hiring difficulties. 	<p>If a Hiring grantee delays in filling locally-funded officer positions, the cause of the delay must be for reasons unrelated to the COPS grant award. Because of the unique recruiting and hiring procedures of each agency, discretion and flexibility is allowed.</p>
<p><u>Hiring Grants:</u> Grantee promoted a locally-funded part-time officer to fill a grant funded full-time position and used local funds to backfill the part-time vacancy. Grant funds were not expended until the vacant position was backfilled.</p>	<p>All of the following are necessary to verify compliance:</p> <ul style="list-style-type: none"> · Copy of local budget documents indicating that the level of funding budgeted and expended for part-time positions has at least remained the same as before the grant award. · Copy of documentation demonstrating that the part-time officer was hired with local funds before grant funds were expended on the promoted full-time officer. 	<p>If a grantee chooses to promote a previously employed part-time officer to fill a full-time COPS grant position, then grantee must hire a new, additional part-time officer with local funds to backfill the resulting vacancy. The grantee may not expend COPS Hiring grant funds on the new full-time position until it has filled the part-time vacancy.</p>
<p><u>Hiring Grants:</u> Officers funded under the COPS grants were hired after the award of the grant.</p>	<p>Documentation verifies the grant officers' hire date to be after the grant award date (or allowable hiring date for FAST and AHEAD).</p> <p>Or, if officers were hired before the award date, supporting documentation confirms officers were hired with the direct anticipation of receiving a COPS grant and would not have been hired in the absence of COPS funding. (e.g., memorandum provided to officer confirming that position is contingent upon receipt of grant funds; evidence in local budget or meeting minutes that position is otherwise unfunded if COPS grant is not awarded).</p>	<p>COPS-funded officers are to be hired after the award date of the grant. The only exception, which must be approved in writing by the COPS Office, is for officers hired in direct anticipation of the grant whose positions were not otherwise funded with State, local, or Bureau of Indian Affairs (BIA) funds.</p> <p>If officers were hired before the award date of the grant, and grant money is used to pay for the costs of salaries and benefits after the award, the grantee must demonstrate that the officers were hired in anticipation of the grant award.</p>

**Supplanting, continued**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 41-49 for a complete explanation of Supplanting.		
<p><u>MORE Grants:</u> State or local baseline level of funding for civilians and level of civilian positions does not decrease during the life of the grant</p>	<p>Copy of department or local government budget reflects no decrease in State or local funding for civilian personnel during each fiscal year of grant implementation.</p>	<p>The goal of the grants is to increase the "baseline" level of State, local, or BIA funds that would have been budgeted for civilian personnel in the absence of COPS funding.</p>
	<p>Or, if the baseline level of funding for civilians or the level of civilian positions decreased, copies of department, local government budgets, or other supporting documentation verify that the decrease occurred for reasons unrelated to the grant award.</p>	<p>If there is a decrease in the State or local baseline funds for civilians or level of civilian personnel during the life of the grant, grantees must show that the decrease occurred for reasons unrelated to the award of grant funding. If the decrease occurred because the grantee received grant funding, a supplanting violation exists.</p>
<p><u>MORE Grants:</u> Grantee followed standard procedures used to recruit and hire part-time and full-time locally-funded civilian support vacancies in a timely and active manner during the life of the grant.</p>	<p>One or more of the following will verify compliance:</p> <ul style="list-style-type: none"> · Copy of standard recruiting and hiring procedures compared to grantee's actions in filling vacancies during the grant period confirms grantee has not delayed in filling locally-funded positions. · If there are no formal written procedures, review of historic hiring practices support grantee's compliance with filling, or actively trying to fill locally-funded positions in accordance with its standard practice. · Copy of civil service list and the grantee's, or civil service officer's, confirmation that historical hiring practices are being followed. · Documented high turnover rate for department supports grantee's delay in filling vacant positions. · Rate that COPS-funded vacancies and locally-funded vacancies are filled is approximately the same or the grantee provides evidence that a delay in filing local vacancies occurred for reasons unrelated to receipt of grant funding. 	<p>MORE civilian grantees must take active and timely steps through their standard recruiting and hiring procedures to fill all locally-funded civilian vacancies that arise during the grant period. To determine if the grantee has continued its standard recruiting and hiring practices, various factors must be reviewed. Because of the unique recruiting and hiring practices of each agency, discretion and flexibility is allowed.</p>

**Supplanting, continued**

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 41-49 for a complete explanation of Supplanting.		
<p><u>MORE Grants:</u> Grantee delayed in following standard procedures used to recruit and hire locally-funded part-time and full-time civilian vacancies after the award of grant money because of reasons unrelated to the receipt of grant funding.</p>	<p>Supporting documentation verifies that the delay occurred for reasons unrelated to the receipt of COPS grant funding.</p>	<p>If there has been a delay in filling locally-funded civilian positions, the delay must have occurred for reasons unrelated to the grant award. Because of the unique recruiting and hiring procedures of each agency, discretion and flexibility is allowed.</p>
<p><u>MORE Grants:</u> Grantee promoted a locally-funded part-time civilian to fill a grant funded full-time position and used local funds to backfill the part-time vacancy. Grant funds were not expended until the vacant position was backfilled.</p>	<p>All of the following are necessary to verify compliance:</p> <ul style="list-style-type: none"> · Copy of budget documents indicating that the level of funding for part-time positions has at least remained the same as before the grant award. · Copy of documentation demonstrating that the part-time replacement civilian was hired with local funds before grant funds were expended on the promoted full-time civilian. 	<p>If a grantee chooses to promote a part-time civilian to fill a full-time COPS grant position, then grantee must hire a new, additional part-time civilian with local funds to backfill the resulting vacancy. The grantee may not expend COPS MORE grant funds on the new full-time position until it has filled the part-time vacancy.</p>
<p><u>MORE Grants:</u> Purchase of approved technology and equipment occurred after the award start date.</p>	<p>Purchase requests, payment receipts, or other documentation for each item purchased verifies purchase occurred after date of grant award.</p> <p>Or, if purchase of approved technology and equipment occurred before the award date, then purchase requests, payment receipts, department budget, or other supporting documentation confirms that purchases were made with the direct anticipation of receiving a COPS grant.</p>	<p>COPS-funded technology and equipment items are to be purchased after the award date of the grant. The only exception, which must be approved in writing by the COPS Office, is for civilian hired in direct anticipation of the grant and whose positions were not otherwise funded with State, local, or BIA funds.</p>
<p><u>MORE Grants:</u> Civilians performing support services under the COPS grants were hired after the award start date.</p>	<p>Paperwork associated with the hiring of new civilians for support services verifies the hire date to be after the award start date.</p> <p>Or, if new civilians were hired before the award date, then department budget and other supporting documentation confirms that civilians were hired with the direct anticipation of receiving a COPS grant.</p>	<p>COPS-funded civilian hires are to be hired after the award date of the grant. The only exception, which must be approved in writing by the COPS Office, is for equipment/technology purchased in direct anticipation of the grant that was not otherwise funded with State, local, or BIA funds.</p>



F. Reporting

GOAL: Program Progress Reports and Financial Status Reports that provide information about the status of grants are promptly submitted to the proper Federal agency.

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 49-52 for a complete explanation of Reporting.		
<p><u>Hiring Grants:</u> FAST, AHEAD, and UHP Department Initial Reports are submitted to the COPS Office within 45 days of receipt.</p> <p>Hiring grants awarded after November 2003 - See Comments</p>	<p>All of the following are necessary to verify compliance:</p> <ul style="list-style-type: none"> · Department Initial Report completed accurately. · Department Initial Report submitted on time. · Department Initial Report received by the COPS Office. 	<p>The Department Initial Report is required only if a Hiring grant is awarded for the first time. This report applies to Hiring grants only (with the exception of the CIS program).</p> <p>Grantees receiving grants after November 2003 will no longer be required to submit an Initial Report.</p>
<p><u>Hiring Grants:</u> Department Annual Reports are submitted to the COPS Office in February of each year that the grant is active (with the exception of CIS, which may require less frequent submission).</p>	<p>All of the following are necessary to verify compliance:</p> <ul style="list-style-type: none"> · Department Annual Report completed accurately. · Department Annual Report submitted on time. · Department Annual Report received by the COPS Office, even if the grant has been in effect for only a portion of the reporting period. 	<p>Department Annual Reports are required until grant end date.</p>
<p><u>MORE Grants:</u> MORE Progress Reports are submitted to the COPS Office within 45 days of receipt.</p>	<p>All of the following are necessary to verify compliance:</p> <ul style="list-style-type: none"> · MORE Progress Report completed accurately. · MORE Progress Report submitted on time. · MORE Progress Report received by the COPS Office, even if civilian personnel are not hired or equipment is not purchased. 	<p>Only one progress report is required for MORE grants.</p>
<p><u>Hiring Grants:</u> Officer Progress Reports - See Comments</p>		<p>Beginning in December 1999, the Officer Progress Report is no longer required, due to incorporation of the questions into the COPS Count Surveys.</p>
<p><u>Hiring and MORE Grants:</u> Financial Status Reports are submitted to the COPS Office online within 45 days after the end of the calendar quarter.</p>	<p>All of the following are necessary to verify compliance:</p> <ul style="list-style-type: none"> · Financial Status Reports, SF-269A completed accurately. · Financial Status Reports, SF-269A, submitted on time. · Financial Status Reports, SF-269A, received by the COPS Office. 	<p>As of October 1, 2004, all COPS grantees are encouraged to submit SF-269As online.</p>



G. Training: CIS Grantees

GOAL: For the CIS program, sworn officers and school administrators receive the required SRO training.

Performance Standards	Performance Indicators	Comments
Refer to section V, page 52-53 for a complete explanation of Training.		
<u>COPS in Schools (CIS) Grants:</u> Each COPS-funded SRO and the school administrator representing the lead-partnering agency must attend one COPS-sponsored SRO training session.	The following will verify compliance: <ul style="list-style-type: none">· Evidence showing that the training was completed before the grant period ended.	CIS grantees are encouraged to meet the training requirement in the early stages of the grant period. Both the COPS-funded SRO(s) and school administrator are encouraged (but not required) to attend the training together.



H. Timesavings for Redeployment

GOAL: MORE Grant Program awards result in timesavings that are directly related to the redeployment of sworn officers who participate in community policing.

Performance Standards	Performance Indicators	Comments
Refer to section V, pages 52-56 for a complete explanation of Timesavings for Redeployment.		
<p><u>MORE Grants:</u> For the MORE 2001 and previous MORE programs, timesavings resulting from MORE grant award implementation is being tracked through a redeployment tracking plan.</p> <p>As of the MORE 2002 program, formal redeployment tracking is no longer required, but grantees must ensure that the timesavings resulting from the grant project is resulting in the initiation or enhancement of community policing (see Community Policing performance standards and indicators).</p>	<p>Documented tracking plans developed by MORE 2001 and earlier grantees show how timesavings will be tracked for each item, system or group of like items awarded. One or more of the following may be used to verify compliance:</p> <ul style="list-style-type: none"> · Work-study plans. · Studies using sampling techniques. · Directly tracking hours. · Acceptable cost accounting methods. · Any reasonable time estimation technique. 	<p>No single tracking method can cover all situations and all jurisdictions. Each jurisdiction varies in size and each situation varies in complexity.</p> <p>Actual tracking, pursuant to the plan, will begin after equipment is fully implemented as contained in the plan. Tracking must continue for at least one full year from the date that the technology or equipment is implemented and declared fully operational. This time is necessary for the agency to achieve the total timesavings benefit identified. For MORE civilian awards, tracking should begin when civilian personnel realize maximum timesavings and should continue for at least one full year from that date.</p> <p>These plans should include a statement explaining how time is being saved, the method used to track timesavings (estimation, direct tracking sample, study, etc.), the hours to complete the activity before and after equipment or technology or civilian personnel are implemented, and a short description of enhanced community policing activities resulting from the timesavings.</p>



Performance Standards	Performance Indicators	Comments
Refer to section V, pages 53-56 for a complete explanation of Timesavings for Redeployment.		
<p><u>MORE Grants:</u> Time is saved as a result of equipment, technology, overtime (funded only to MORE '95 grant recipients), or civilians awarded under the MORE Program.</p>	<p>One or more of the following may verify compliance:</p> <ul style="list-style-type: none"> · For MORE 2001 and previous grantees, redeployment tracking plans maintained by grantees that support time saved as a result of MORE grant awards. · Redeployment tracking documentation that supports time saved as a result of MORE grant awards. In absence of a formal tracking mechanism, MORE 2002 grantees should be able to show enhanced community policing activities or a direct result of the timesavings achieved with the completion of the MORE 2002 grant award. 	<p>For MORE 2001 and previous grantees, tracking a project's timesavings is required once the equipment is fully implemented.</p> <p>Once timesavings has been tracked and a determination can be made about the actual total hours saved, a redeployment tracking worksheet summarizing results of FTEs saved should be submitted with progress reports, effective January 1999.</p> <p>MORE renewals require evidence of continued, but not additional redeployment.</p>
<p><u>MORE Grants:</u> As a result of time saved, grantees demonstrated enhanced community policing activities.</p>	<p>Documentation kept by local law enforcement agency showing that time saved as a result of equipment, technology, overtime (funded only to MORE '95 grant recipients), or civilians (MORE 2000 funded civilian support resources only) awarded results in additional community policing activity.</p>	<p>Grantees are required to identify the community policing activities that have been initiated or enhanced as a result of time saved under the MORE grant. Grantees do not need to show every hour of timesavings committed to a specific community policing activity.</p>

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

Appendix A: Glossary of Terms



Appendix A: Glossary of Terms

Actual/Projected Level of Redeployment

Refers to the number of Full-Time Equivalent (FTE) officers that a grantee projects it will deploy as a result of timesavings achieved through the purchase of equipment and technology or hiring of civilians. (See definition of "Required Level of Redeployment" for comparison.)

Allowable Costs

The Hiring programs provide for salaries and approved fringe benefits for three years for sworn entry-level, lateral-transfer, or rehired officers. Only entry-level salary and approved fringe benefit costs are allowable under the grant. Overtime, training (other than salary and benefits paid during training), weapons, communication equipment, uniforms, vehicles and indirect costs are not allowable costs. The COPS budget memorandum itemizes what costs are allowable for a specific grantee's award.

The MORE program (civilians) provides for the salaries and approved fringe benefits for the duration of the grant period, including through the renewal period if applicable, for civilian hires who perform support and administrative services, resulting in timesavings for officers who are then redeployed to community policing activities. The MORE program (equipment and technology) funds approved purchases that contribute to timesavings for the officers who are then redeployed to community policing activities. Overtime costs for sworn officers engaging in community policing activities were also allowable under the MORE '95 Program. The Memorandum of Recommended and Estimated Funding and the COPS budget memorandum specify what costs are allowable under the MORE grants.

Authorized Officials

The authorized officials are the law enforcement and government executives who have ultimate and final responsibility for all programmatic and financial decisions regarding the grant as representatives of the legal grantee.

Baseline Level

The "baseline" is the level of State, local, or Bureau of Indian Affairs (BIA) funding for sworn personnel (if a Hiring grant) or for civilians or equipment and technology (if a MORE grant), as well as number of sworn officers, which would exist in the absence of the COPS grant funds. To comply with the nonsupplanting requirement, the grantee must use COPS grant funding to increase (supplement) the



baseline at all times during the grant period. Reductions in the State, local, or BIA-funded baseline must be justified by the grantee as unrelated to the receipt of COPS grant funding.

Community Policing

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 through problem-solving tactics and community-police partnership.

COPS in Schools (CIS) School Resource Officer (SRO).

The COPS in Schools Grant Program provides an incentive for law enforcement agencies to build working relationships with schools to use community policing efforts to combat school violence. The CIS grant program allows for the hiring of new, additional sworn officers at entry-level salaries to serve as School Resource Officers, over and above the number of sworn officers that an agency would fund with State, local or BIA funds in the absence of the grant (including other School Resource Officers). 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.

COPS Office

The Office of Community Oriented Policing Services (COPS) is the "grantor agency" for the grantee's COPS grants. The COPS Office is directly responsible for programmatically administering and monitoring the grant for the entire grant period.

FTE

Full-Time Equivalent Officers. The COPS standard of one FTE is 228 shifts x eight hours (per shift), or 1,824 hours per year.

Grant Award Period

The grant award period runs from the official Award Start Date, which may be found on the Award Document, for 36 months if a Hiring grant, or for 12 months if a MORE grant. If a grantee obtains a no-cost extension to the grant award period so that it may complete the required programmatic requirements, the official grant award period is extended until the end date of the no-cost extension.



Grant Number

This number, which is located on the official Award Document, uniquely identifies each grant, and is presented in different formats depending on the grant program type and population the agency serves. The grant number contains 12 alpha-numeric characters arranged as shown below. Prior to FY1999, the grant number only contained eight characters.

The first four characters represent the fiscal year the grant was awarded (e.g., FY2001). The fifth and sixth characters represent the funding code and population (served by the agency) of the program represented (e.g., "UM" which signifies a UHP grant for an agency serving a population of less than 150,000). The next two characters will always be "WX", which represent a COPS Office identifier. The last four characters represent the order in which the grant was awarded by the COPS Office (e.g., the last four digits of the first grant awarded in FY2001 would be "0001," the second grant awarded would be "0002," etc.)

Using the definition above, a UHP grant which was awarded to an agency serving a population of less than 150,000 and which was the 56th grant awarded by the COPS Office in FY2001, would be assigned the number "2001UMWX0056." If the grant were a cooperative agreement, it would be assigned the number "2001UMWXK056."

Hiring Grant Funding Period

The Hiring grant funding period begins the day a COPS-funded officer position is filled and ends when the specific position has been filled and funded for 36 months through COPS funds and the grantee's local match. The COPS Office recognizes that grantees awarded multiple officer positions may fill these positions at different times and that there may be interruptions because of these positions becoming vacant. Therefore, it is possible that a grantee will experience a separate Hiring grant funding period for each officer position (if hired on different dates or vacated for different periods of time during the 36-month funding period) and that the 36 months of funding may require more than three years to complete. To compensate for such delays, the COPS Office offers no-cost grant extensions, which are approved on a case-by-case basis. (The COPS Office will measure successful retention as retention for one full local budget cycle following the conclusion of the Hiring grant funding period for each position, which similarly may result in different retention periods for different officer positions under the same grant.)



Lateral Transferred Officer

A "lateral transfer" is an additional experienced law enforcement officer that a COPS grantee newly hires from another law enforcement agency to fill a COPS grant position. As with all grant officers, lateral transfers must be hired by the COPS grantee after the official COPS grant award date or hiring authorization date if earlier (see Appendix C). COPS Hiring grant funding is limited to entry-level salary and benefits, even if the lateral transfer is paid at a higher level based on experience; grantees instead may supplement the officer's salary with local funds in addition to the required local match.

Matching Funds

Under AHEAD, FAST, UHP and MORE, the grantee is required to match, in cash, a portion of the allowable costs of the program, project, or activity as funded by the COPS program. Grant awards may cover up to 75% of the costs as outlined in the budget submission, and the grantee must contribute at least 25% unless a waiver is obtained. The CIS Grant Program has no local match requirement up to a maximum award amount of \$125,000 for entry-level salary and benefits. Any costs over the maximum award must be paid by local or State funding.

Obligation of Funds

Obligation means a legal liability to pay determinable sums for services or goods incurred during the grant period. Federal funds are considered "obligated" when the Director of the COPS Office, or his designated official, signs the grant award document. Funds are reserved against the grant until the grantee receives payment for all allowable expenses incurred and reported, or until the grant expires.

The Public Safety Partnership and Community Policing Act of 1994

The COPS Office is charged with fulfilling the mandates of this law. 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 when 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.

**Realized Redeployment**

Refers to the number of redeployed full-time equivalents (FTEs) that a department achieves over the course of one year after the awarded equipment/technology has been fully implemented or the civilians have been hired.

Redeployment

Redeployment is defined as when sworn officers, currently employed by the grantee's law enforcement agency, become available to participate in enhanced community policing as a direct result of the timesavings resulting from the purchase and use of technology or equipment or the hiring of civilian support personnel.

Redeployment Tracking

The process by which COPS MORE 2001 and previous MORE grantees measure the time saved as a direct result of the funded technology, equipment, and/or civilian support personnel. The tracking process must also ensure that sworn officers are redeployed into community policing as a result of the realized timesavings. (Redeployment tracking does not apply to MORE 2002 and later MORE grantees, although they must still agree that the timesavings resulting from the grant project will result in the initiation or enhancement of community policing through officer redeployment.)

Redeployment Tracking Plan

A written document that describes how a COPS MORE 2001, and previous MORE grantee, administers redeployment tracking. The plan must describe how time is being saved as a result of the COPS-funded technology, equipment, and/or civilian support personnel, disclose the methodology for measuring the timesavings, and describe how the timesavings for sworn officers enhances community policing activities. (Redeployment tracking plans are not required for MORE 2002 and later MORE grantees, although they must still ensure that officers are redeployed to initiate or enhance community policing as a result of the timesavings resulting from the MORE project.)

Reduction in Baseline Funding in Sworn Personnel

If the baseline funding as well as baseline numbers decreases during the grant period, as a result of a reduction in State, local, or BIA funding, the grantee must prove that the reduction is (or was) unrelated to the receipt of COPS funding to demonstrate compliance with the nonsupplanting requirement. Grantees are prohibited from reducing their baseline funding as a direct result of receiving COPS grant funds.



Rehired Officer

A "rehired officer" is an officer who was (or is about to be) laid off for financial reasons unrelated to the COPS grant and is rehired with COPS grant funds after the official COPS grant award date. If the officer was (or will be) laid off after the grant award start date, the COPS grantee should obtain written authorization from the COPS Office to use COPS grant funds to rehire a laid off officer.

Required Level of Redeployment

In this document the required level of redeployment is used generically, referring to the level of redeployment grantees must reach to comply with their grant terms and conditions. MORE '96, '98, 2000, and 2001 grantees are required to meet the "Required Level of Redeployment" stated on their grant award document. MORE '95 grantees are required to meet what was termed the "projected/actual level of redeployment" that they projected on their application and appears on their grant award document. [MORE 2002 and any later grantees are not required to track redeployment.] Please see below for more information. It is important to note that grantees generally will not be able to reach their required level of redeployment until the project has been fully operational for 12 months. For example, after six months of full operation, a grantee would likely have achieved only half the required number of redeployed FTEs (full time equivalents). The COPS Office will measure successful retention as retention for one full local budget cycle after the required level of redeployment has been met.

a) MORE '96, '98, '00 and '01: These MORE grant programs used the term "Required Level of Redeployment" to refer to the number of FTEs that a grantee must redeploy as a result of timesavings achieved through the purchase of equipment and technology or the hiring of civilians (MORE 2000 funded civilian support resources only) in order to meet the conditions of the grant under the MORE '96, '98 and 2000 programs. This number is based on the calculation of up to 75% of the total project cost of items awarded divided by 75% of the cost of an officer up to \$25,000.

Example: The Marysville Police Department would like to be awarded funding for 20 laptop computers. The total cost of these laptops is \$100,000. The department can request up to 75% of the cost of the item (\$75,000). To calculate the "Required Level of Redeployment," the COPS Office divides 75% of the total cost of the item by 75% of the cost of an officer's salary for one year up to \$25,000. Officers at this department make \$40,000 per year. 75% of 40,000 goes over the \$25,000 cap, so COPS uses the \$25,000 figure. The formula used to calculate the department's "Required Level of Redeployment" is as follows:



$75,000/25,000 = 3.0$ FTEs. ("Required Level of Redeployment")
Therefore, the grantee would reach the required level of redeployment when the equivalent of 3.0 FTEs has been redeployed.

- b) MORE '95:** The MORE '95 Grant Program used the term "projected/actual level of redeployment" to refer to the number of FTEs a grantee projected that they will redeploy as a result of timesavings achieved through the purchase of equipment and technology or the hiring of civilians. Under the MORE '95 program, grantees are required to achieve the "Actual Level of Redeployment" to meet the conditions of the grant.

This number is calculated by multiplying the number of hours that are projected to be saved by the number of officers who will realize timesavings and the number of shifts each of these officers will work in a year. This is divided by the COPS standard of 1,824 hours per year for one FTE. It should be noted that grantees may use different variations of this formula to calculate their estimated timesavings as long as they use the COPS 1,824 hours standard for one FTE.

Example: The Marysville Police Department estimates that by using laptop computers to write their reports in the field, each of the officers in the department will be able to save 1 hour per shift. There are 30 officers in the department who will realize this timesavings. The formula used to calculate the department's "Actual Level of Redeployment" is as follows:

$1 \text{ hour} \times 30 \text{ officers} \times 228 \text{ shifts (COPS standard)} = 6,840 \text{ hours}$
 $6,840 / 1,824 \text{ (COPS standard)} = 3.8 \text{ FTEs. ("Actual Level of Redeployment")}$

Therefore, the grantee would reach the required level of redeployment when the equivalent of 3.8 FTEs has been redeployed.

- c) MORE 2002 and later MORE programs:** MORE 2002 (and any later) grantees are not required to track redeployment, although they must still ensure that officers are redeployed to initiate or enhance community policing as a result of the timesavings resulting from the MORE project.

Supplanting

For the purpose of a COPS grant, supplanting means replacing State, local, or Bureau of Indian Affairs funds, which otherwise would have been spent on the specific law enforcement purposes of the COPS grant (i.e., hiring sworn officers; hiring civilians; purchasing equipment



or technology), with Federal COPS funds. A grantee is prohibited from supplanting throughout the grant period, which means that a grantee may not use COPS funds to pay for any personnel, civilians or officers, or any technology and equipment that otherwise would have been employed, purchased, or made available with State or local funds in the absence of the COPS Program. COPS funds must be used, instead, to supplement a grantee's law enforcement budget for these purposes.

Supplemental Grant Award (UHP)

Prior to January 1, 2001, agencies that received multiple UHP grant awards kept the same grant number for each new award. The awards were distinguished using a Supplemental numbering system (i.e., UHP Supplement 1, Supplement 2). Each Supplement was a new grant for additional officer positions with its own start and end date. Grantees were required to complete only one set of Program Progress Reports and Financial Status Reports for both the original grant award and any supplemental awards. As of January 1, 2001, the COPS Office discontinued the use of Supplemental Grant Awards and all UHP grants awarded on or after that date now receive a unique grant number.

Support Services

Support services are those services provided by non-sworn personnel, including civilians, funded under the COPS MORE Programs. The hiring of these personnel must result in the redeployment of sworn officers into community policing.

Sworn Career Law Enforcement Officer

A sworn career law enforcement officer is 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.

Threshold Review Date

The COPS Office first measures a Hiring grantee's baseline as of a threshold review date (standard for each program), plus any State, local, or Bureau of Indian Affairs (BIA) funding added for additional sworn officer positions after the threshold review date (see page 70) during the grant period. A MORE grantee's baseline is measured as of a threshold review date, plus any State, local, or BIA funding added for additional civilian positions or equipment and technology. The baseline therefore may increase during the grant period if additional State, local, or BIA funding is budgeted for the object of the grant award (see Appendix C for grant threshold review dates). Reductions in the baseline after the threshold review date may be indications of supplanting (see Chapter V, Section F.)



Tracking Timesavings/Redeployment

MORE '95, '96, '98, '00 and '01

Redeployment tracking plans must include a statement explaining how time is being saved, as well as an explanation of the tracking method used. Also, plans should include the method used to track timesavings (estimation, direct tracking sample, study, etc.), the hours to complete the activity before and after the equipment or technology is implemented or civilian hired, and a short description of enhanced community policing activities resulting from the timesavings. Finally, the plan should have an explanation of how the time saved through this grant will allow the agency to enhance its community policing efforts.

Once fully operational, and timesavings has been tracked, a determination can be made about the actual total hours saved. Examples of timesaving calculations are provided at Appendix D.

To demonstrate compliance in reaching required levels of redeployment, grantees must demonstrate satisfactory progress in implementing their COPS MORE grants. Delays in grant implementation may result in a finding of noncompliance (and possibly termination of the grant award) if grantees are unable to document satisfactory progress in implementing the grant program (e.g., by documenting the time line of a lengthy procurement process).

MORE 2002 and later MORE programs

There is no tracking requirement for the MORE 2002 grant and later MORE grants, although they must still ensure that officers are redeployed to initiate or enhance community policing as a result of the timesavings resulting from the MORE project.

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

Appendix B: Examples of Compliance/Non-Compliance Cases



Appendix B: Examples of Compliance/Non-Compliance Cases

Source of Matching Funds

EXAMPLE 1.

When audited, a police department shows that it paid its 25% local match to a COPS MORE grant with funds from the department's "equipment and technology" line item.

Possible Source of Matching Funds Violation. If grantees include the source of the local match in the current year's operating budget, it must be intentionally budgeted in anticipation of the grant award or previously budgeted as reserve or discretionary monies; it may not have been previously budgeted for specific law enforcement purposes and reallocated to pay the COPS grant local match.

Investigation and Analysis. The department provided a memorandum and related budget documents from its city budget office that showed the city had provided new, additional local funds to the department specifically to pay for the local match to the COPS grant. Because the MORE grant application requested funding for equipment, the city chose to place the required match into the "equipment and technology" budget line item. Further, other documentation revealed that the city provided the additional local funding for the department in anticipation of the grant award.

Final Resolution. The grantee is in compliance with the source of matching funds requirement.

Supplanting

EXAMPLE 1.

The department has one open locally-funded full-time position. This position remains vacant while the city continues to hire COPS-funded officers.

Possible Supplanting Violation. In assessing the presence of supplanting, it is expected that the grantee will continue to hire new officers at a level consistent with the recent historical practice and take positive steps to fill all vacancies resulting from attrition. These steps must be taken in addition to hiring the officers funded with the COPS grant. A grant recipient may show, however, based on particular local fiscal or other conditions, that



it is not possible to take all of these steps, or that it would have taken the same action that raises a question of supplanting even if the COPS grant had not been awarded.

Investigation and Analysis. The city has been deemed to be in a state of financial emergency. Enough debt has been accumulated on behalf of the city such that it needs to procure a \$300,000 loan simply to continue to exist. Further, it is understood that the entire city personnel staff has been laid off except for the City Manager and the remaining police personnel. The city provides documentation demonstrating that all departments, including the police department, are under a citywide hiring freeze.

Final Resolution. The grantee has complied with the nonsupplanting requirements. The vacancy is a result of a citywide hiring freeze that is unrelated to the COPS grant.

EXAMPLE 2.

Before receiving a COPS Hiring grant, a city passes a tax increase for the specific purpose of adding 10 sworn officer positions to the police department. At the time of the grant award, the department has not hired any new officers for the additional 10 positions. Upon receiving grant funding, the department hires 10 new sworn officers and pays for the additional positions with COPS grant funds. The city then reduces the taxes the following year to "return" the previously enacted tax increase to the citizens.

Possible Supplanting Violation. The department is required to hire all new, additional officer positions for which the city funds would be budgeted in the absence of the grant in addition to hiring the additional COPS grant positions. The city may not reduce the department's budget for sworn personnel as a direct result of the receipt of Hiring grant funds.

Investigation and Analysis. The city committed additional local funds to hire 10 new sworn officers for the department before the COPS grant award was funded. This commitment of local funding increased the city's baseline level of locally-funded sworn personnel by the additional 10 positions. The fact that the department has not filled these positions at the award date of the grant is irrelevant to the nonsupplanting analysis.



Final Resolution. The city violated the nonsupplanting requirement by using grant funds to replace local funds when hiring the 10 officers. The city had specifically instituted a tax increase for the purpose of hiring 10 new, additional sworn officers, and once the officers were hired, after the award of grant funding, the city "returned" the tax increase to the citizens.

The city ultimately agreed that it supplanted the local funds initially raised through increased taxes with COPS grant funds. The city agreed to repay the grant funds to the COPS Office to remedy the nonsupplanting violation.

EXAMPLE 3.

A department receives a MORE grant to purchase 10 mobile data terminals (MDTs). The grant award start date is October 1, 2002. When audited, the department provides copies of the purchase orders for the MDTs, which were signed on June 1, 2002. The department did not pay for the terminals until November 1, 2002, and the MDTs were not delivered to the department until December 1, 2002.

Possible Supplanting Violation. All COPS MORE grant funds must be expended on civilians hired or equipment purchased following the award date of the COPS grant. If personnel are recruited or hired before the award date of the grant, or if equipment was purchased before the award date, there must be a clear and direct causal link between the hiring or purchase and the anticipation of grant funding. Further, MORE grantees must purchase new, additional equipment and technology that would otherwise not be purchase with State or local funds.

Investigation and Analysis. If the signed purchase order from June 1, 2002 represented a commitment to purchase the MDTs without regard to the availability to COPS grant funding, the date of payment and delivery is irrelevant to supplanting analysis.

The department was unable to provide any supporting documentation to link the signed purchase order of June 1, 2002 to the anticipation of the MORE grant funding. The purchase order itself did not reference the source of funding for the MDT's, and it did not contain any clause that purchase was contingent upon outside factors regarding the source of funding. The department was unable to supply any correspondence between department officials and the vendor to indicate that the MORE funds had been discussed in any way in relation to the signed purchase order. In addition, a May 2002 memorandum from the city manager's office to the department authorized the



department to sign the purchase order with the understanding that the city would pay for the terminals "if the federal grant did not come through."

Final Resolution. The grantee did not comply with the nonsupplanting requirement because it used grant funds to purchase the MDTs pre-award and not in direct anticipation of the award. The violation was confirmed with the memorandum from the city manager stating that the city would pay for the terminals if the COPS Office did not award the department a grant.

The department repaid the COPS MORE grant funds that had been expended on the MDTs.

Financial Reports

EXAMPLE 1.

Records indicate that the grantee is delinquent in submitting financial status reports.

Possible Financial Reporting Violation. A Financial Status Report (SF-269A) must be completed by grantee and returned on a quarterly basis to the COPS Office. The Financial Status Reports request information on monies spent, or accrued, including amounts for Federal expenditures, local matching contributions and the unobligated balance of the award.

Investigation and Analysis. Although there had not been any financial activity on the grantee's behalf for the past two quarters, the financial reports still must be completed and submitted to the COPS Office. The grantee completed one report covering all periods for which it was delinquent (two quarters in this case) and faxed it to the appropriate COPS point of contact.

Final Resolution. The grantee was not in compliance with the financial reporting requirement, but remedied the violation by submitting the updated report. NOTE, however, that if this grantee is audited by the Office of the Inspector General (OIG), the OIG will require the grantee to complete one Financial Status Report for each quarter of the award, rather than the comprehensive (two quarters) report that it filed with the COPS Office.



EXAMPLE 2.

Grantee claims it did not draw down funds in the amount of \$13,897 on 11/13/02 as the Office of the Comptroller's records indicate.

Possible Financial Reporting Violation. Financial Status Report (SF-269A) must be completed by grantee and returned on a quarterly basis to the COPS Office. The Financial Status Reports request information on monies spent including amounts for both the Federal and local match portion of the award.

Investigation and Analysis. Although the grantee does not have any record of the transaction, a previous draw down for the same amount was processed six months earlier, and there were two draw downs from that account, one of which was posted on 11/13/02 according the Office of the Comptroller financial transactions records and the grantee's banking institution. It appears as if the grantee's accounting records are in error and should be adjusted.

Final Resolution. Once the grantee adjusts its accounting records and verifies that its quarterly financial report accurately reflects grant expenditures, then it will be compliant with the financial reporting requirement.

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

Appendix C: Grant Threshold Review Dates



Appendix C: Grant Threshold Review Dates

COPS Hiring Grants Program Name	Threshold Supplanting Review Date	Early Hire Review Date
Phase I	October 1, 1994	October 1, 1994
AHEAD	October 1, 1994	October 1, 1994
FAST	October 1, 1994	February 8, 1995
<u>Universal Hiring Program (UHP)</u> <u>COPS in Schools (CIS)</u>		
5/1/03 - 4/30/04 application	May 1, 2003	Award Start Date
5/1/02 - 4/30/03 application	May 1, 2002	Award Start Date
5/1/01 - 4/30/02 application	May 1, 2001	Award Start Date
5/1/00 - 4/30/01 application	May 1, 2000	Award Start Date
5/1/99 - 4/30/00 application	May 1, 1999	Award Start Date
5/1/98 - 4/30/99 application	May 1, 1998	Award Start Date
5/1/97 - 4/30/98 application	May 1, 1997	Award Start Date
5/1/96 - 4/30/97 application	May 1, 1996	Award Start Date
5/1/95 - 4/30/96 application	May 1, 1995	Award Start Date

COPS Redeployment Grants Program Name	Threshold Supplanting Review Date	Early Hire or Purchase Review Date
COPS MORE '95	Application Submission Date	Award Start Date
COPS MORE '96	Application Submission Date	Award Start Date
COPS MORE '98	Application Submission Date	Award Start Date
COPS MORE '00	Application Submission Date	Award Start Date
COPS MORE '01	Application Submission Date	Award Start Date
COPS MORE '02	Application Submission Date	Award Start Date

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

Appendix D: Examples of Redeployment



Appendix D: Examples of Redeployment Tracking

EXAMPLE 1: REDEPLOYMENT BY SHIFT

The Neely County Sheriff's Department applies for a MORE grant to purchase 10 Mobile Data Terminals (MDTs). The department has 20 full-time officers assigned to patrol; each MDT will be used by more than one officer. Currently, each patrol officer runs an average of 20 tag or license checks per shift. Each check takes about five minutes. If the department receives the MORE grant, it estimates that each officer will only need three minutes per check, a savings of two minutes per check. The cost of the 10 MDTs is \$100,000. To determine its required level of redeployment, the department would use the following formula, which is laid out in the Cost Effectiveness Worksheet portion of the grant application:

Required Redeployment

Line 1	Entry level salary of SWORN police officer (as of Jan. 1, 1998)	1.	\$ 28,000
Line 2	Fringe benefits of SWORN police officer (as of Jan. 1, 1998)	2.	\$ 5,000
Line 3	Add lines 1 and 2	3.	\$ 33,000
Line 4	Multiply line 3 by .75	4.	\$ 24,750
Line 5	Enter figure on line 4 or \$25,000, whichever is less	5.	\$ 24,750
Line 6	Total cost of item, system, or group of like items (100%)	6.	\$100,000
Line 7	Federal amount requested.	7.	\$ 75,000
	Can be no more than 75% of total item cost (line 6)		
Line 8	Divide line 7 by line 5	8.	3.03 FTEs

Projected/Actual Redeployment

The formula used to calculate the projected actual redeployment for this grant would be:

2 min. saved X 20 checks	= 40 min. per shift
40 min./shift X 20 officers x 228 shifts	= 182,400 min./yr.
182,400 min./60min.	= 3,040 hrs. per yr.
3,040 hrs. /1,824 hrs. (COPS standard)	= 1.66 FTEs
1.66 FTE saved per year	

This is less than the required amount in the above calculation, but as demonstrated below, the department plans to use the MDTs for other uses also.



The department also states that it will use the laptops for report writing while its patrol officers are in their vehicles. Again, the laptops will be used by more than one (1) officer. Currently, each of the 20 officers spends two hours per shift writing reports. With the laptops, they believe they can save 1 hour per shift. The reports will have automated formats and can be sent for approval, via modem, versus driving back to the station.

The formula used to calculate the projected actual redeployment is:

$$\begin{aligned} 1 \text{ hr. per shift} \times 20 \text{ officers} \times 228 \text{ shifts} &= 4,560 \text{ hrs. per yr.} \\ 4,560 \text{ hrs.} / 1,824 \text{ hrs. (COPS standard)} &= 2.5 \text{ FTEs} \end{aligned}$$

So by saving 1.66 FTEs with the tag checks and 2.5 FTEs with the reports, the department projects a total redeployment of 4.1 FTEs, which is above the minimum required and the department receives the grant.

Redeployment Tracking Plan

The next task for the Neely County Sheriff's Department is to develop a redeployment tracking plan for its MORE grant. The agency begins its redeployment tracking plan with a short summary of the project and how it will save time for officers within the agency:

"The Neely County Sheriff's Department has been awarded a COPS MORE grant for 10 mobile data computers. These mobile data computers will be used as part of a pilot project to assess the effectiveness of automated field reporting in this agency. We believe that this new technology will allow patrol officers to perform quicker records checks and that it will make our reporting process more efficient. Through the assistance of the grant-funded technology, officers will be able to conduct their own records checks without going through dispatch. The field reporting system will reduce the need to enter duplicate information for accident and incident reports and will save officer travel time by allowing patrol officers to electronically transmit their reports to their supervisor."



The next part of the plan explains the method that the Neely County Sheriff's Department will use to track the timesavings from its grant-funded technology:

"The Neely County Sheriff's Department will track the timesavings from the grant-funded mobile data computers by comparing the survey results of the officers using the new equipment to the survey results (baseline) of the patrol officers writing reports prior to the implementation of the grant technology. For one week during each quarter, the 20 officers using the mobile data computers will track the number of records checks and reports that they write per day and how long these activities take them. Prior to the grant award, the Sheriff's Department completed log sheets, which demonstrated the time necessary to complete various checks and reports. The responses will be compared to determine the amount of timesavings produced by the new technology."

The final part of the redeployment tracking plan includes an explanation of how the time saved through this grant allowed this agency to enhance its community policing efforts:

"The officers using the computers will devote approximately one hour of their timesavings per day to problem-solving projects. During this time, the officers will contact community residents to identify community concerns and will work with community and city agencies to proactively address the causes of these concerns. The officers will respond to a minimal number of calls for service during this time."

**Implementing the Redeployment Tracking Plan**

The Neely County Sheriff's Department begins to implement its redeployment tracking plan once the grant-funded technology has been purchased and becomes fully operational. For one week during each quarter of the one-year redeployment tracking period, the agency requires officers to complete daily logs tracking how many reports and records checks are performed by officers and how long these activities take. These logs are completed by the 20 officers using the mobile data computers and compared to the time survey completed prior to the implementation of the technology. The results from the logs are used to form projections for timesavings over a one-year period.

Group One: 20 officers prior to technology implementation

	Week 1	Week 2	Week 3	Week 4	Overall Averages
# Shifts	100	110	120	105	
Total hours report writing time	400	312	450	400	
Average hours writing reports per shift	4.00	3.12	3.75	3.80	3.67 hrs
Total hours for records checks	180	190	220	210	
Average hours performing records checks per shift	1.8	1.7	1.8	2.0	1.8 hrs

Group Two: 20 officers with mobile data computers

	Week 1	Week 2	Week 3	Week 4	Overall Averages
# Shifts	100	110	120	105	
Total hours report writing time	306	312	400	320	
Average hours writing reports per shift	3.00	3.12	3.33	3.05	3.13 hrs
Total hours for records checks	150	200	180	130	
Average hours performing records checks per shift	1.5	1.8	1.5	1.2	1.5 hrs



Group One: 3.67 hrs. report writing per shift + 1.8 hrs.
performing records checks per shifts = 5.47 hrs.

Group Two: 3.13 hrs. report writing per shift + 1.5 hrs.
performing records checks per shifts = 4.63 hrs.

Time savings = 5.47 hrs. for officers without technology
- 4.63 hrs. for officers with technology
= 0.84 hrs saved per shift

0.84 hrs. per shift x 20 officers x 228 shifts
(COPS Office standard) = 3,830 hrs.

3,830 hrs./1,824 hrs. (COPS Office standard) = **2.1 FTEs saved**

In this case, the grantee demonstrated timesavings of 2.1 full-time equivalents. While its projected/actual redeployment fell short of the 3.03 FTE required redeployment for the grant, the grantee could document other unanticipated timesavings or other types of benefits which may have occurred as a result of the project to evaluate the project's effectiveness.

EXAMPLE 2: REDEPLOYMENT BY WEEK

The Snoutsville Police Department applies for a MORE grant to purchase a CAD/RMS system and 30 laptops. Currently, the department uses radio dispatch and all reports are done by hand. The department estimates that each of the 40 patrol officers currently spends about 15 hours per week writing reports and driving them back to the station for approval. If the department receives the MORE grant, it estimate that each officer will save approximately 7.5 hours per week. The cost of the system is \$230,000. To determine it required level of redeployment, the department would use the following formula that was laid out in the Cost Effectiveness Worksheet portion of the grant application.



Required Redeployment

Line 1	Entry level salary of SWORN police officer (as of Jan. 1, 1998)	1.	\$	36,000
Line 2	Fringe benefits of SWORN police officer (as of Jan. 1, 1998)	2.	\$	6,000
Line 3	Add lines 1 and 2	3.	\$	42,000
Line 4	Multiply line 3 by .75	4.	\$	31,500
Line 5	Enter figure on line 4 or \$25,000, whichever is less	5.	\$	25,000
Line 6	Total cost of item, system, or group of like items (100%)	6.	\$	230,000
Line 7	Federal amount requested.	7.	\$	172,500
	Can be no more than 75% of total item cost (line 6)			
Line 8	Divide line 7 by line 5	8.		6.9 FTEs

Projected/Actual Redeployment

The formula used to calculate the projected actual redeployment for this grant would be:

$$7.5 \text{ hrs.} \times 40 \text{ officers} \times 52 \text{ weeks} = 15,600 \text{ hrs. per yr.}$$

$$15,600 \text{ hrs.} / 1,824 \text{ hrs. (COPS standard)} = \mathbf{8.6 \text{ FTEs}}$$

The department exceeds the required redeployment level and is awarded the MORE grant.

Redeployment Tracking Plan

The Snoutsville Police Department must now come up with a plan to track redeployment once its system becomes operational. The agency begins its redeployment tracking plan with a short summary of the project and how it will save time for officers within the agency.

"The Snoutsville Police Department was awarded a grant to purchase and implement a new CAD/RMS system and MDTs to make our communications and report writing systems more efficient and effective. Prior to the implementation of the grant, the department estimates that each officer spends an average of 15 hours per week writing reports and driving them back to the station for processing. Through the use of our new CAD/RMS system and MDTs, we estimated that we could cut this time in half."

The next part of the plan is an explanation of the method that the Snoutsville Police Department will use to track the timesavings realized through the use of the funded equipment.

"In order to track the timesavings that officers will realize under this grant, we have issued log sheets to each officer and asked them to log in the time that is spent entering



reports into the laptop and sending them to headquarters through wireless transfer. On a weekly basis, we will use a sample based on the reports of 8 of the officers to determine the average amount of time that each officer saves as a result of the implementation of the CAD/RMS and MDTs."

Finally, the department describes how the timesavings it realizes will enhance its community policing efforts.

"With the time saved through the use of the grant-funded equipment, officers will attend community meetings with community and business leaders. The department will also begin a program to target high crime areas through increased foot/bike patrols."

Implementing the Tracking Plan

The department implements the grant, and each officer submits a time log at the end of the week showing timesavings that are achieved as a result of the grant. The log sheets are then totaled for each officer and entered into a spreadsheet tracking the timesavings that each officer realizes. Because tracking the timesavings for 40 officers is very time consuming, the department uses a sample of 8 officers who work varying shifts to determine timesavings across the department. A sample of the spreadsheet that they use to track the hours saved follows:

Officer	Sun	Mon	Tues	Wed	Thurs	Fri	Sat	Total
Dame	1.25	1.75			1.5	1	2	7.5
Chapman		1.5	1.5	2	1	1.25		7.25
Neely	1.5	1.5	1.25	1.75	2			8.0
Carey		1.75	1.75	2	1.5	1		8.0
Lynch	1	1.75			1.5	2	1.5	7.75
Carr	2	1.5	1.25	1.25			1.5	7.5
Ng	.5			1	2	1.25	1.25	7.0
Williams		2	1.75	1.5	1.5	1.25		8.0
Total	7.25	10.0	7.5	9.25	11.5	8.25	7.25	61.0



The department is able to tabulate on a weekly basis the timesavings that accrues over the course of the grant. When the COPS Count Operators call at the end of the first three months of fully operational status, the department reports that, on average (based on the sample), officers are spending 7.6 hours per week writing reports. These are timesavings of 7.4 hours per week. The following formula is used to determine the department's progress after 12 weeks:

$$7.4 \text{ hrs. per officer} \times 12 \text{ weeks} \times 40 \text{ officers} = 3,552 \text{ hrs. saved}$$
$$3,552 \text{ hrs.} / 1,824 \text{ hrs.} = 1.9 \text{ FTEs saved over 12 weeks.}$$

If the department remains on track with these levels of timesavings, they will achieve a total timesavings over a period of one year of 7.6 FTEs. Although this is slightly less timesavings than the originally projected, it still exceeds the required level of redeployment for the grant.

After the award, CAD/RMS system has been implemented, the department notices that its four (4) criminal investigators are also experiencing some unanticipated timesavings as a result of the grant. Since the Department now uses a records management system, the four detectives each save two hours per week because they no longer need to review lengthy handwritten reports that were poorly filed in the past. Now, the detectives have all of the available information on their computers, which is much faster than the old process. The department decides to track these timesavings as well since it will help them in exceeding their required redeployment level. Since each detective is saving an average of two hours per week, the following timesavings can be anticipated over the course of the year (this should be tracked incrementally as it accrues):

$$2 \text{ hrs. per week} \times 4 \text{ officers} \times 52 \text{ weeks} = 416 \text{ hrs.}$$
$$416 \text{ hrs.} / 1,824 \text{ hrs. (COPS Standard)} = .2 \text{ FTEs}$$

If the timesavings the department is currently achieving stays on track, they can expect to realize redeployment of 7.8 FTEs over the course of one year.

EXAMPLE 3: REDEPLOYMENT BY REPORT

The Sunshine Police Department applies for a MORE grant to purchase 12 laptop computers with supporting hardware and report writing software. Currently, all officers hand-write their reports. The department has a sworn force strength of 25 officers with four patrol officers assigned to each shift. Last year, the department generated a total of 28,763 reports. Each officer currently spends about 40



minutes writing each report and averages five reports per shift. If the department receives the MORE grant, it estimates that each officer will save approximately 20 minutes per report, cutting the time it takes to complete the reports in half. The cost of the laptops with supporting hardware/software is \$60,000. To determine required level of redeployment, the department uses the following formula which is laid out in the Cost Effectiveness Worksheet portion of the grant application.

Required Redeployment

Line 1	Entry level salary of SWORN police officer (as of Jan. 1, 1998)	1.	\$	23,000
Line 2	Fringe benefits of SWORN police officer (as of Jan. 1, 1998)	2.	\$	3,000
Line 3	Add lines 1 and 2	3.	\$	26,000
Line 4	Multiply line 3 by .75	4.	\$	19,500
Line 5	Enter figure on line 4 or \$25,000, whichever is less	5.	\$	19,500
Line 6	Total cost of item, system, or group of like items (100%)	6.	\$	60,000
Line 7	Federal amount requested.	7.	\$	45,000
	Can be no more than 75% of total item cost (line 6)			
Line 8	Divide line 7 by line 5	8.		2.3 FTEs

Projected/Actual Redeployment

Using the number of reports the department generated in the previous year, the department uses the following formula to calculate the projected actual redeployment for this grant;

$$\begin{aligned}
 28,763 \text{ reports per yr.} \times 20 \text{ min. per report} &= 575,260 \text{ min.} \\
 575,260 \text{ min.} / 60 \text{ min.} &= 9,587 \text{ hrs. saved} \\
 9,587 \text{ hrs. saved} / 1,824 \text{ hrs. (Cops standard)} &= \mathbf{5.3 \text{ FTEs}}
 \end{aligned}$$

The department exceeds the required redeployment level and is awarded the MORE grant.

Redeployment Tracking

The Sunshine Police Department must now develop a plan to track redeployment once its system becomes operational. The agency begins its redeployment tracking plan with a short summary of the project and how it will save time for officers within the agency.

"The Sunshine Police Department was awarded a grant to purchase 12 laptops with supporting hardware and report writing software to make writing reports more efficient. Prior to the implementation of the grant, the department estimated that each officer spent about 40 minutes writing each report. Through the use of the new laptops and report writing software, we estimate that we will cut this time in half."



The department then goes on to explain what method it will use to track the timesavings realized through the use of the laptops and report writing software.

"In order to track the timesavings that officers will realize under this grant, we have issued log sheets to each officer and asked them to log in the time that is spent entering reports into the laptop and sending them to headquarters through wireless transfer. On a monthly basis we will take a sample of the time logs for 12 officers on varying shifts to determine the average amount of time officers spend writing a report after the awarded equipment becomes operational."

The final part of the redeployment tracking plan includes an explanation of how the time saved through this grant will allow the department to enhance its community policing efforts.

"With the time saved through the use of the grant-funded equipment, the department will begin a school resource officer program in the high school. Additionally, we hope to begin conducting a citizen survey on crime and institute several neighborhood watch programs."

Implementing the Redeployment Tracking Plan

The department implements the grant and each officer submits a time log for each shift showing timesavings that is achieved as a result of the grant. The log sheets are then totaled for each officer and entered into a spreadsheet tracking the timesavings that each officer realizes. Because tracking the timesavings for 25 officers can be time consuming, the department uses a sample of 12 officers who work varying shifts to determine timesavings for the entire department. Using the log sheets, the department is able to create the following spreadsheet to determine how long it takes officers to do a report on average. A sample of the spreadsheet that they use to track the hours saved follows:



Officer	Reports per Shift	Time spent writing reports
Dame	8	180 minutes (3 hours)
Chapman	5	135 minutes (2.25 hours)
Neely	3	60 minutes (1 hour)
Carey	6	150 minutes (2.5 hours)
Lynch	6	150 minutes (2.5 hours)
Carr	2	30 minutes (.5 hours)
Ng	5	120 minutes (2 hours)
Williams	7	225 minutes (3.75 hours)
Dodge	6	150 minutes (2.5 hours)
Webb	8	180 minutes (3 hours)
Phillips	6	150 minutes (2.5 hours)
Alford	4	120 minutes (2 hours)
TOTAL	66	1,650 minutes (27.5 hours)

Three months after the equipment becomes fully operational, the department is able to tabulate on a daily basis the timesavings that accrues over the course of the grant. Based on the sample, the department finds that, on average, each officer spends 25 minutes per report. This results in timesavings of 15 minutes per report.

1,650 min. / 66 reports = 25 min. per report
 40 min. per report (prior to grant) - 25 min. per report (post grant) =
 15 min. in savings per report

Over the three-month period, the department has generated 7,230 reports. Therefore, their timesavings, to date, can be calculated as follows:

7,230 reports x 15 min. per report = 108,450 min.
 108,450 min. /60 min. = 1,807 hrs. saved
 1,807 hrs. saved / 1,824 hrs. (COPS standard) = **1 FTE**



If the department continues to see this level of timesavings for the remainder of the 12 months, they can expect to realize redeployment of 4 FTE. Although this is slightly fewer timesavings than they originally estimated, it still exceeds the required level of redeployment for the grant. After the laptops have been implemented, the department notices that there are additional timesavings that occur as a result of the grant, including:

- electronically transferring reports to supervisor instead of driving reports to headquarters, and
- electronic revisions after review instead of re-writing reports.

EXAMPLE 4: REDEPLOYMENT BY ARREST

Two years ago, arrest processing in the Gotham City Police Department meant transporting a prisoner to a central location in downtown Gotham, manually fingerprinting and capturing arrest data, taking the arrestee's photograph, and then transporting the prisoner to court for arraignment. The backup of prisoners caused delays and officers have, on occasion, spent as much as 10 hours processing an arrest! The arrest processing procedures consisted of manually fingerprinting and photographing a suspect, entering the suspect's information into the department's centralized booking system, and then transporting the prisoner to the District Attorney to complete the booking process. On average, Gotham police officers spent 8 hours per arrest completing the procedures required to process an arrested suspect.

The Gotham City Police Department applied for a MORE grant to purchase an arrest processing system, including video conferencing, Live Scan fingerprinting, photo imaging, warrant checks, and automated arrest data processing.

Line 1	Entry level salary of SWORN police officer	1.	\$	30,000
Line 2	Fringe benefits of SWORN police officer	2.	\$	8,500
Line 3	Add lines 1 and 2	3.	\$	38,500
Line 4	Multiply line 3 by .75	4.	\$	28,875
Line 5	Enter figure on line 4 or \$25,000, whichever is less	5.	\$	25,000
Line 6	Total cost of item, system, or group of like items (100%)	6.	\$	10,000,000
Line 7	Federal amount requested.	7.	\$	7,500,000
Can be no more than 75% of total item cost (line 6)				
Line 8	Divide line 7 by line 5	8.		300 FTEs



Projected/Actual Redeployment

The formula used to calculate the projected or actual redeployment for this grant would be:

Timesavings per arrest

Travel time to central booking	1.5 hours
Report writing and mug shots	.5 hours
Pro-rated travel time to fax & re-fingerprint rejected prints	.5 hours
Travel time for affidavit issuance	1.5 hours

Total timesavings 4.0 hours

136,800 arrests per year (September 1998-September 1999)

136,800 x 4 hrs. saved = 547,200 hrs. saved

547,200 hrs. saved / 1,824 hrs. = **300 FTEs redeployed**

With the help of a COPS MORE grant, the Gotham City Police Department has now completely decentralized its arrest processing system. The GCPD's arrest processing system is now composed of five major automated components, including Live Scan fingerprinting, photo imaging, warrant checks, automated arrest data processing, and video conferencing. The Live Scan units, photo imaging, video conferencing equipment, and the upgraded on-line booking system were purchased in 1997 and were completely operational in September 1998. Operationally, Live Scan has eliminated the need to manually ink and record an arrestee's fingerprints. It generates computerized files of an individual's prints by guiding the user through the process and rejecting poor quality prints as they are generated, eliminating "bad prints" and the need for reprinting suspects. The prints are then transmitted to the Department of Criminal Justice Services at the State Capitol for further analysis, and to central records for storage. The photo imaging and warrant system takes, stores, and retrieves images for each of the city's five prisoner holding facilities. All precincts throughout the city have the ability to display and print the photos. Video conferencing is used in each of the precincts, eliminating the need to travel to the District Attorney's office to complete the arrest affidavit.

Redeployment Summary

With the installation of the automated components that comprise the department's decentralized booking function, it now takes approximately four hours to process an arrest.



Before the decentralization afforded by the MORE technology, officers had to transport arrestees to a centralized booking facility for arrest processing. After the implementation of the technology, officers no longer spend an inordinate amount of time travelling (sometimes in city or rush hour traffic) to and from the precinct to the centralized booking facility. Based on calculated averages of a sample of officers across all the affected precincts, one and one-half (**1½ hours per arrest**) are saved through the elimination of travel time to the central booking facility.

Prior to the implementation of the on-line booking system, officers were required to complete multiple written reports that often captured duplicative information. Additionally, the processing time for mug shot photographs added time to the booking process. With the implementation of an on-line booking system and digital mug shot processing, the time to process an arrest has been reduced by **30 minutes per arrest** by eliminating duplicative paperwork and reducing the time spent taking and developing photographs.

Prior to Live Scan, three fingerprint cards were inked and then faxed to the State Capitol. Some precincts did not have a fax machine that would provide the level of graphic detail required to transmit the prints, also resulting in travel time that is no longer needed. If prints sent to the State Capitol were rejected, the arresting officer was required to reprint the arrestee and go through this process again. If an arrestee had been moved to a different holding facility, time was spent tracking the arrestee down. Based on the proportion of prints that required travel to an upgraded fax machine (approximately one-fifth (1/5) of all arrestee prints), and the proportion of prints that required reprinting due to rejection at the State capital (approximately one-fourth (1/4) of all arrestee prints), an average of **30 minutes per arrest** is saved through this automated booking technology.

The last step in the booking process involved transporting arrestees to the District Attorney's Office for issuing arrest affidavits. The video conferencing equipment installed as part of the upgraded arrest processing function has virtually eliminated all travel between the precinct and DA's office for issuing arrest affidavits as all arrestee questioning is now conducted in the local precinct via video teleconferencing. The video teleconferencing component of the arrest processing system has yielded an average officer timesavings of **1½ hours per arrest**.

With the implementation of Live Scan, along with the other components of the system, an offender is printed and photographed automatically, data is entered directly into the booking system from the precinct (paperless reporting), and the arrest affidavit is completed via



video-conferencing. Redeployment occurs by eliminating the need to perform routine multiple prints, waiting time for receiving confirmation from the State Capitol, in reprinting rejected prints, taking manual photographs, and most importantly, by reducing travel time to and from the precinct to the central booking facility and the District Attorney's Office. In sum, the new technology has permitted the Gotham City Police Department to save police officer arrest processing time citywide.

Calculation

Redeployment Requirement = 300 FTEs, based on an awarded amount of \$7,500,000 (\$7,500,000/\$25,000 maximum allowable per FTE = 300 FTEs)

Timesavings per arrest

Travel time to central booking	1.5 hours
Report writing and mug shots	.5 hours
Pro-rated travel time to fax & re-fingerprint rejected prints	.5 hours
Travel time for affidavit issuance	1.5 hours
Total Timesavings	4.0 hours

136,800 arrests per year (September 1998-September 1999)

136,800 x 4 hrs. saved = 547,200 hrs. saved

547,200 hrs. saved / 1,824 hrs. = **300 FTEs redeployed**

300 FTEs redeployed into community policing since the equipment became fully operational in September 1998.

Unanticipated Timesavings

Because both mug shots and fingerprints are now stored electronically in a centralized citywide database, detectives who formerly used to scour through paper files for hours on end can now search the fingerprint and mug shot archives during the investigative process.

Based on a survey of the detectives conducted in the detective bureau, detectives are now saving an average of 1 hour per search.

Timesavings of 1 hour per search

One hour per either fingerprint or mug shot search x 300,000 searches per year citywide (September 1998-September 1999) = 300,000 hrs. saved.

300,000 hrs. saved / 1,824 hrs.

= **164.5 FTEs of unanticipated timesavings for detectives**

TOTAL FTEs Redeployed: 300 + 164.5 = 464.5



Redeployment Tracking

The Gotham City Police Department must now come up with a plan to track redeployment once its system becomes operational. Using the guidelines provided in the Redeployment Tracking Q&A Fact Sheet provided by the COPS Office, the department prepares the following tracking plan.

"The Gotham City Police Department was awarded a grant to purchase and implement a new arrest processing system to significantly reduce the time spent by police officers processing arrestees. Prior to the implementation of the new system, the department documented the time spent by randomly sampling 25 officers (across the department) and tracking their time during each phase of the arrest process, which includes: the transport time, fingerprint processing time, time spent completing several required paper reports, and the time spent in the issuance of arrest affidavits by the prosecuting attorney (includes transport and holding time). This entire process averaged 8 hours across the 25 sampled arresting officers. With the installation of the multiple component arrest processing system, we estimated that this time would be reduced by 50 percent. In order to validate these estimates, we waited until all components of the arrest processing system were fully operational, which was approximately 18 months after receiving the grant award. We then ran the same time tests for each of the components of the arrest process on another sample of 25 arresting officers on a quarterly basis for one year after becoming fully operational with the arrest processing and booking system."

The quarterly time test employed by the Gotham City P.D. takes into consideration the potential improvements in efficiencies to be experienced by the members of the department. Simply put, as officers become familiarized with the automation and the new arrest processing system, the time saved could presumably increase. By sampling 25 officers each quarter, and tracking/documenting their activities during the arrest process, the Gotham City P.D. is in a good position to then come up with a reasonable average for the number of hours saved per arrest, which could then be applied to the total number of arrests per year.



The following is the formula used to determine the actual timesavings department-wide (formula would need to be applied quarterly, at minimum, with each subsequent sample time test period):

Total hours of time saved per arrest =
 Total of transportation time saved
 + Booking/mug-shots
 + Fingerprinting
 + Issuance of arrest affidavits

Total time saved x number of arrests for the quarter
 = number of hours saved/COPS standard (1,824 hrs)
 = number of FTEs redeployed

In this case, assuming they met their projected levels, they would save 4 hours per arrest x 34,200 arrests in the quarter, resulting in 136,800 hours saved, or 75 FTEs redeployed, in the quarter. This process would need to be repeated until the full year is complete, which would then yield the total timesavings/redeployment that would be reported to the COPS Office.

EXAMPLE 5: TASK-ORIENTED CIVILIAN REDEPLOYMENT

The Wickersville Police Department applies for a MORE grant to hire four civilian Police Aides to assist with answering non-emergency calls for service. Currently, the department estimates that each officer spends about three (3) hours per shift answering non-emergency calls for service. The department has a sworn force strength of 34 officers with six patrol officers assigned to each shift. If the department receives the MORE grant, it estimate that each officer will save approximately 1.5 hours per shift as a result of the civilian hires. The cost of hiring these 4 civilians is \$100,000 including salary and benefits. To determine its required level of redeployment, the department would use the following formula that was laid out in the Cost Effectiveness Worksheet portion of the grant application.

Line 1	Entry level salary of SWORN police officer (as of Jan. 1, 1998)	1.	\$	28,500
Line 2	Fringe benefits of SWORN police officer (as of Jan. 1, 1998)	2.	\$	6,800
Line 3	Add lines 1 and 2	3.	\$	35,300
Line 4	Multiply line 3 by .75	4.	\$	26,475
Line 5	Enter figure on line 4 or \$25,000, whichever is less	5.	\$	25,000
Line 6	Total cost of item, system, or group of like items (100%)	6.	\$	100,000
Line 7	Federal amount requested.	7.	\$	75,000
	Can be no more than 75% of total item cost (line 6)			
Line 8	Divide line 7 by line 5	8.		3.0 FTEs



Projected/Actual Redeployment

Using the estimated number of hours that these civilians could save each officer per shift, the department uses the following formula to calculate the projected actual redeployment for this grant:

$$1.5 \text{ hrs. per officer per shift} \times 34 \text{ officers} \times 228 \text{ shifts} = 11,628 \text{ hrs. saved}$$
$$11,628 / 1,824 \text{ hrs} = \mathbf{6.4 \text{ FTEs}}$$

The department exceeds the required redeployment level and is awarded the MORE grant.

Redeployment Tracking

The Wickersville Police Department must now come up with a plan to track redeployment once the civilian positions have all been hired and received the necessary training. Using the guidelines provided in the Redeployment Tracking Q&A Fact Sheet provided by the COPS Office, the department prepares the following tracking plan. The first portion provides a short summary of the project.

"The Wickersville Police Department was awarded a grant to hire 4 civilian Police Aides to assist the department in handling non-emergency calls for service. Prior to the implementation of the grant, the department estimated that each officer spent about three hours per shift answering these types of calls for service. By hiring the civilian Police Aides, we still estimate that we have cut this time in half."

Next, the department explains the method planned to use to track the timesavings resulting from the hiring of the civilian police aides.

"In order to track the timesavings that officers will realize under this grant, we have issued log sheets to each officer and asked them to log in the time that they spend each shift on non-emergency calls for service. On a monthly basis, we will take a sample of the sheets for 10 officers on varying shifts to determine the average amount of time per shift that they spend answering non-emergency calls for service after the civilian police aides are hired and trained."



Finally, the department details the community policing activities that they plan to implement as a result of the time saved as a result of the grant.

"With the time saved through the hiring of these civilians, the department will set up a "hot spot" analysis program to target high crime areas."

Implementing the Redeployment Tracking Plan

The department implements the grant, and each officer submits a time log each shift showing timesavings that is achieved as a result of the grant. The log sheets are then totaled for each officer and entered into a spreadsheet tracking the timesavings that each officer realizes. Once the civilians are hired, the department finds that only 24 officers will benefit from them because they will not be working the 3rd shift. Because tracking the timesavings for 24 officers is very time consuming, the department uses a sample of 10 officers who work varying shifts to determine timesavings across the department. Using the log sheets, the department is able to create the following spreadsheet to determine how long it takes officers to do a report on average. A sample of the spreadsheet that they use to track the hours saved follows:

Officer	# of non-emergency calls	Hours spent on non-emergency calls
Ng	3	2
Dillion	1	1
Roberts	2	1.5
Lynch	2	2.5
Conyers	3	3
Carroll1	1	1
Beamon	4	3
Hilliard	3	2
Carey	2	1.5
Carr	3	2.5
Total	24	20



Three months after the civilians are hired, the department is able to tabulate on a daily basis the timesavings that accrue over the course of the grant. The department finds that, on average (based on the sample), each officer is spending two hours per shift answering non-emergency calls for service. This results in an average of one hour of timesavings per officer per shift. The department calculates the timesavings to date as follows:

$$1 \text{ hr.} \times 24 \text{ Officers} \times 57 \text{ shifts (1/4 of 228)} = 1,368 \text{ hrs. saved}$$
$$1,368 \text{ hrs.} / 1,824 \text{ hrs. (COPS standard)} = \mathbf{.8 \text{ FTEs}}$$

If the department continues to see this level of timesavings for the remainder of the 12 months, they can expect to realize redeployment of 3.2 FTEs. This is less timesavings than what the department had originally projected, but it still exceeds the required level of redeployment. The department attributes the reduced savings to the fact that officers on the late shift do not have the benefit of the civilians who only work the first two shifts of the day.

Appendix E: Reference Material

U.S. Department of Justice Grant Policies

Financial Guide: U.S. Department of Justice, Office of Justice Programs, Office of the Comptroller; Current Edition.

Universal Hiring Program Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

COPS in Schools Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

COPS MORE '95 Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

COPS MORE '96 Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

COPS MORE '98 Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

COPS MORE 2000 Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

COPS MORE 2001 Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

COPS MORE 2002 Grant Owner's Manual: U.S. Department of Justice, Office of Community Oriented Policing Services

Statutes

Public Safety Partnership and Community Policing Act of 1994
42 U.S.C. § 3796dd *et seq.*

Administrative Requirements:

OMB Circular A-102, "Grants and Cooperative Agreements with State and Local Governments"



OMB Circular A-110, "Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations"

Cost Principles:

OMB Circular A-21, "Cost Principles for Educational Institutions"

OMB Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments"

OMB Circular A-122, "Cost Principles for Non-Profit Organizations"

Audit Requirements:

OMB Circular A-133, "Audits of States, Local Governments and Non-profit Organizations"

Inspector General Act of 1978, as amended (Title 5 U.S.C. Appendix 3)

Code of Federal Regulations:

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

5 CFR Part 1320, "Controlling Paperwork Burdens on the Public"

5 CFR Part 151, "Political Activity of State or Local Officers or Employees"

28 CFR Part 23, "Criminal Intelligence Systems Operating Policies"

28 CFR Part 30, "Intergovernmental Review of Department of Justice Programs and Activities"

28 CFR Part 42, "Nondiscrimination; Equal Employment Opportunity; Policies and Procedures"

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



28 CFR Part 70 , "Uniform Administrative Requirements for Grants and Cooperative Agreements With Institutions of Higher Education, Hospitals and Other Non-Profit Organizations"

28 CFR Part 67, "Government-wide Requirements for Drug-Free Workplace (Grants)"

28 CFR Part 69, " New Restrictions on Lobbying"

31 CFR Part 205, "Rules and Procedures for Efficient Federal and State Funds Transfers"

Executive Order 12549, " Debarment and Suspension"

Executive Order 12372, "Intergovernmental Review of Federal Programs"

Executive Order 12291 "Federal Regulation"

Grant Monitoring Standards and Guidelines for Hiring and Redeployment

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