



**The State of Rhode Island
and Providence Plantations**

**General
Grant
Program
Administration**

**Policies and
Procedures**

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Public Safety Grant Administration Office
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I. PLACEMENT IN STATE GOVERNMENT

The Public Safety Grant Administration Office (PSGAO), formerly the Rhode Island Justice Commission (RIJC) is an agency within the Rhode Island Department of Public Safety that is responsible for planning, coordination, data collection/statistical analysis, and grant administration and distribution for the adult and juvenile criminal justice systems.

The Public Safety Grant Administration Office develops comprehensive planning, coordination, and programming for the purpose of improving the state criminal justice system's overall response to crime issues. The PSGAO pursues a variety of activities authorized by state and executive designation. The support of these efforts is primarily facilitated through the administration of federal grants, which are applied for and subsequently awarded to the PSGAO on behalf of the State of Rhode Island.

A. Mission Statement

To facilitate interagency cooperation and collaboration throughout the Rhode Island criminal justice system by way of strategic planning, program coordination, data collection and statistical analysis while providing fair, efficient and accountable grant administration so as to improve the system's response to crime and victimization and enhance public safety.

B. Agency Objectives

- Coordinate and implement a statewide integrated computerized Criminal Justice Information System, called the Justice Link Public Safety Network;
- Continue comprehensive/specialized planning and technical assistance efforts in support of the criminal and juvenile justice systems present and future;
- Ensure that projects receiving funding utilize their funds consistent with federal and state grant administration regulations;
- Initiate and support programs designed to impact crime and/or improve the criminal and juvenile justice system;
- Continue to produce studies/reports describing the status of particular crime problems;
- Perform detailed monitoring, evaluation and analysis.

II. STATUTORY AUTHORITY

The Public Safety Grant Administration Office derives its authority from §42-26-1 of the General Laws of Rhode Island, “The Rhode Island Justice Commission Act”.

A. Duties and Functions

The PSGAO develops comprehensive planning, coordination, and programming for the purpose of improving the state criminal justice system's overall response to crime issues. The PSGAO pursues a variety of activities authorized by state and executive designation, including the following:

- Serve as the state planning agency for administration of federal criminal justice related grant programs;
- Establish goals, priorities and standards for the reduction of crime and the improvement of the administration of justice in the state;
- Apply for, contract for, receive, and expend for its purposes any appropriations or grants from the state, its political subdivisions, the federal government, or any other source public or private, in accordance with the appropriations process;
- Collect data from any state, local or non-profit entity which receives state or federal funding whose information is necessary to the PSGAO to carry out its functions;
- Disseminate to state agencies, units of local government, public or private agencies, and others, information such as criminal justice program advancements; research results, training events, and availability of funds.

B. Policy Board

This legislation also creates a supervisory body identified as the Policy Board. The PSGAO Policy Board meets a minimum of four times a year to review and approve planning and grant funding recommendations from various advisory committees and the Steering Committee. The composition of the Policy Board is such that coordination among all criminal justice system agencies is assured. The Policy Board is comprised of law enforcement personnel, legislators, prosecutors, the public defender, judges, citizens, directors of various state departments and representatives from community service organizations.

The Policy Board works toward the strategic planning and coordination of all grant programs administered by the PSGAO as well as to develop criminal justice system policies and priorities. To that end, the Chairman of the Policy Board appoints advisory committees on an as-needed basis.

1. Steering Committee

The Steering Committee, a nine member executive committee of the Policy Board, identifies the principle problems facing the state's criminal justice system and makes procedural recommendations to the Policy Board and the various grant program advisory committees. Having decided which problems facing the state are top priorities, the Steering Committee makes recommendations to the grant advisory committees to ensure relevant aspects of the identified problems are addressed. Further, the Steering Committee is empowered to specifically coordinate responses to any of the state's priority areas by requesting that grant advisory committees concentrate on specific delineated projects or activities to be advertised in requests for proposals.

2. Other Advisory Committees

PSGAO staff members directly administer the various grant programs with the assistance of specific advisory committees. Individuals with expertise in a grant program area comprise the membership of the various advisory committees as they represent state, local and private-non-profit entities. The following advisory committees develop policy initiatives, establish program priorities and make funding recommendations to the Policy Board:¹

- the Juvenile Justice Advisory Committee;
- the Victims of Crime Act Advisory Committee;
- the Violence Against Women Planning Committee (includes a Law Enforcement Training Task Force and a Curriculum Committee);
- the Crime Prevention Planning Committee;
- the Local Law Enforcement Planning Committee; and
- the Technical Advisory Committee.

¹ In the absence of a specific grant advisory committee, the Steering Committee acts as the Advisory Committee for the development of policy initiatives, the establishment of program priorities and to make funding recommendations to the Policy Board.

III. PROCUREMENT PROCEDURES

A. Competition

The PSGAO will operate an effective procurement system by obtaining goods and services within a competitive environment whenever possible.

Awards shall be made to the most responsive and responsible subgrantee, taking into consideration the reliability of the subgrantee, their conformity with the specifications and the best interests of the state.

The PSGAO shall be responsible for verbatim compliance with purchasing legislation enacted by the General Assembly and with all related policies, rules, regulations, procedures and codes promulgated by the Chief Purchasing Officer and shall be held accountable for violations of the spirit, intent and letter of these governing requirements.

All employees of the PSGAO shall be responsible for carrying out their designated functions with care, integrity and a sense of responsibility to the taxpayers of Rhode Island for providing public services in the most cost-effective manner possible.

B. Competitive Environment

A competitive environment shall be considered to exist when the following conditions are met:

- Potential subgrantees are compared to determine relative merit;
- Objective standards of comparison are fairly and impartially applied;
- Subgrantees are evaluated within a specified context conducted using objective standards to assure fairness and to encourage participation;
- An equal opportunity for participation in any request for proposals applies to all prospective subgrantees.

C. Awards to Non-Profit Agencies

State agencies may obtain grants and then award nonprofit agencies or other entities subgrants for services or programs. When the payment of grant funds is subject to the provision of services or programs, determination of contract award shall be obtained by a request for proposal procedure to obtain the advantages of competition.

Nonprofit status shall not automatically exempt organizations from being subject to competitive purchasing principles.

All grant contracts entered into by state agencies shall be subject to an audit of competitive practices.

Grants in the form of subsidies or general assistance shall be administered by state agencies in accordance with legal mandates restricting or defining the use of such funds.

D. Exceptions to Competition

The following types of subgrants are not subject to the provisions of competitive procurement:

- To local governments and state agencies;
- To specific recipients or categories of recipients as prescribed by legislative mandate(including federal programs).

E. Delegated Authority

In order to assure that cost-effectiveness and efficiency are best served, upon application and approval of the Director of the Department of Administration, pursuant to RIGL §37-2-1, the Administrative Manager of the PSGAO, shall have delegated purchase authority to enter into agreements for the purpose of distributing grants.

Such authority shall be subject to written documentation/explanation as to why the nature of the relationship between the agency and the payee does not constitute a procurement.

Delegated contracting authority does not require the issuance of a purchase order.

The delegated purchasing authority of the PSGAO resides solely with the Administrative Manager.

F. Special Provisions for Grants

Grants for the provision of programs, services, and facility improvements shall not be authorized without agreements or contracts which:

- specify the purpose for the grant;
- specify method and terms of payment;
- define service or product, if required;
- outline any legal limitations on the funding;
- set a time limit for distribution of funds;
- require maintenance of records for a specified period of time;
- provide for auditing; and
- provide for termination of the agreement/contract.

G. Records and Inspection

Documentation records may be in the form of copies, microfilms, computer files or other means permitted in accordance with procedures established and published by the Chief Purchasing Officer or shall be original documents as required by law or the State Controller.

1. Project Abstracts

Each application for funding submitted by prospective subgrantees, together with the name of the subgrantee, shall be recorded and an abstract made available for public inspection. Subsequent to the awarding of a subgrant, all documents pertinent to the awarding of the subgrant shall be made available and open to public inspection and retained in the subgrant file.

All documentation records shall be subject to public disclosure with the following exceptions:

- Information of a proprietary nature submitted by a potential subgrantee;
- Information furnished by a potential subgrantee in connection with an inquiry related to responsibility.

2. Public Inspection

Abstracts of potential subgrantee information shall be available for public inspection at the offices of the Public Safety Grant Administration Office no later than ten (10) working days after an award has been made. These summaries are presented to the Policy Board when funding recommendations are presented by advisory committees.

Requests for access to records other than potential subgrantee abstracts shall be made in writing and signed by the applicant.

The Administrative Manager of the PSGAO shall have a reasonable time to respond to requests for access to information, pursuant to provisions of Chapter 38-2-1 through 38-2-15 of the General Laws of R.I., as amended, "Access to Public Records."

Reviews of document records shall be permitted by appointment only and shall be conducted under the supervision of an employee of the Public Safety Grant Administration Office.

No documentation shall be removed from the premises of the office of the Public Safety Grant Administration Office without the written consent of the Administrative Manager of the Public Safety Grant Administration Office.

H. Grievance Procedure

Any actual or prospective subgrantee who is aggrieved in connection with the solicitation or selection for award may file a protest with the Administrative Manager of the Public Safety Grant Administration Office. A protest or notice of other controversy must be filed promptly

and in any event within two (2) calendar weeks after such aggrieved person knows or should have known of the facts giving rise thereto. All protests or notices of other controversies must be in writing.

In the event of a timely filed protest, the Public Safety Grant Administration Office shall not proceed further with the solicitation or award involved, until the Administrative Manager of the Public Safety Grant Administration Office makes a written and adequately supported determination that continuation of the procurement is necessary to protect substantial interest of the state.

The protestor may request access to documentation to support his protest subject to the above procedures for public inspection.

I. Violations of Regulations, Policies and Procedures

Deliberate disregard for regulations, policies and procedures shall be subject to disciplinary action, including dismissal of state employees and debarment of subgrantees conducting business with the state.

Violations of the purchasing code of ethics set forth herein, shall be subject to appropriate sanctions including dismissal, suspension, and debarment.

The Administrative Manager of the PSGAO shall have authority to impose sanctions, in accordance with personnel administration requirements, on any PSGAO employee who has been found to have violated the state purchasing code of ethics.

The Administrative Manager of the PSGAO shall have the authority to suspend or debar subgrantees in accordance with the requirements set forth herein.

Suspected violations of state conflict of interest laws and regulations regarding procurement or the state procurement code of ethics set forth herein shall be reported in confidence to the Chief Purchasing Officer and in accordance with the rules and regulations established by the Rhode Island Ethics Commission.

J. RI Ethics Law/Supplemental State Code of Procurement Ethics

It is the policy of the state of Rhode Island that public officials and employees must adhere to the highest standard of ethical conduct; respect the public trust and the rights of all persons; be open, accountable and responsive; avoid the appearance of impropriety; and not use their positions for private gain or advantage.

All state employees shall be subject to the provisions of §36-14-1 of the General Laws of Rhode Island and all regulations promulgated by the Rhode Island Ethics Commission, as well as any special provisions of this section.

Additionally, all state employees are subject to §37-2-9(2)(o), the Supplemental State Code of Procurement Ethics.

K. Standards and Specifications

1. Responsibility of Subgrantees

A reasonable inquiry to determine the responsibility of a subgrantee may be conducted. The failure of a subgrantee to supply information promptly in connection with an inquiry related to responsibility may be grounds for a determination of nonresponsibility.

Prompt shall mean five (5) working days unless otherwise specified by the Administrative Manager of the PSGAO.

Except as otherwise provided, by law, information furnished by a subgrantee pursuant to this section may not be disclosed outside of the PSGAO without prior written consent of the subgrantee.

The Administrative Manager of the PSGAO may utilize factors such as financial capability, reputation, management, etc., to evaluate the responsibility and qualifications of potential subgrantees in order to develop a list of prospective subgrantees qualified for awards.

As a prerequisite condition for grant award, the Administrative Manager of the PSGAO may require any subgrantee to submit current certifications of financial responsibility, affirmative action compliance, drug-free and barrier free environment, and status as small, women-owned and/or disadvantaged businesses.

2. Pre-qualification of Subgrantees

The Administrative Manager of the PSGAO may provide for prequalification of subgrantees as responsible prospective subgrantees for particular types of supplies, services, and construction.

3. Standards and Specifications

- The Administrative Manager of the PSGAO shall have the responsibility for issuing and maintaining all standard specifications for subgrantees. Among his/her duties, he/she shall, to the greatest extent practicable, assure that all specifications shall be drafted so as to maximize competition in fulfillment of the state's requirements.
- Solicitations shall be prepared in a manner and form which enables potential subgrantees to submit fully responsive and knowledgeable offers, and which clearly define the criteria to be used in evaluating responses.

4. Grant Applications

All material submitted by prospective subgrantees to the PSGAO for consideration shall be in sufficient detail and shall contain adequate supportive information to:

- Describe the purpose, use, or desired performance level of the requirement;
- Identify measurable criteria for evaluation of potential subgrantees including, but not limited to, acceptance testing; and
- Wherever possible, solicitations shall incorporate a standard specification, describing the level of performance required, and measurable criteria which define acceptance.

The Chairperson of the PSGAO Policy Board, with the advice of the Policy Board, based on the recommendation of the PSGAO Steering Committee and the Administrative Manager of the PSGAO, shall develop advisory committees to review, develop, and update specifications and standard item designations for frequently and/or extensively granted programs.

- Selection and evaluation criteria shall be clearly defined in all solicitations.
- The invitation for proposals shall state the criteria upon which the award shall be made.
- Unless alternate offers are clearly requested or allowed, only those offers, which are responsive, in all material respects, to the terms of the solicitation, shall be considered.
- Except as otherwise authorized by federal mandate, or as specifically exempted herein, all subgrants shall be awarded as the result of requests for proposals.
- Requests for proposals shall be published in sufficient time to afford potential subgrantees a fair opportunity to respond (1 month standard).
- The Administrative Manager of the PSGAO may advertise in widely circulated newspapers, trade journals, the PSGAO website and the RI Division of Purchases website to promote effective competition.
- The Public Safety Grant Administration Office shall be under no obligation to consider an offer which has been submitted without solicitation.

5. RFP Cancellations

A request for proposals or any other solicitation may be cancelled, or all proposals may be rejected, if it is determined in writing that the action is taken in the best interest of the state.

If a solicitation results in none of the proposals being reasonably close to expectations, the Administrative Manager of the PSGAO shall declare all proposals unacceptable and resolicit the procurement.

If a solicitation results in only one proposal, the price of which is not reasonably close to expectations, the Administrative Manager of the PSGAO shall declare the bid unacceptable and either resolicit the procurement or ask that the proposal be negotiated with the subgrantee.

The Administrative Manager of the PSGAO may eliminate subgrantees whose offers are clearly noncompetitive prior to resolicitation.

6. Correction/Withdrawal of Proposals

The Administrative Manager of the PSGAO or his designee shall be the sole determiner of whether correction or withdrawal of proposals may be made without penalty.

The Administrative Manager of the PSGAO shall respond to requests for correction or withdrawal within ten (10) working days of the request.

Correction of a proposal at any time prior to close of the application process may be permitted without penalty when a subgrantee requests that his proposal be returned and he resubmits a corrected proposal prior to the closure of the appellation process.

A potential subgrantee that fails to resubmit a corrected proposal before the closure of the application process shall be considered nonresponsive.

Requests by the apparent subgrantee for correction of proposals identifying all error(s) and specifying corrective action shall be submitted in writing to the Administrative Manager of the PSGAO and shall be re-evaluated with all other proposals within five (5) working days after the award of the grant.

Requests for withdrawal of proposals shall be submitted in writing to the Administrative Manager of the Public Safety Grant Administration Office providing an explanation for the action.

L. Source Selection

1. Requests for Proposal

Requests for Proposal (RFP) shall be utilized to solicit competitive offers in all cases where:

- Lowest price is not the sole or primary consideration to be used in determining an award;
- Performance is neither specific nor objective, and open to the offeror's interpretation;
- It is otherwise anticipated that offers may be substantially different and that there is insufficient common ground for objective comparison; or
- It is anticipated that changes will be made after proposals are opened and that the nature of the proposals and/or prices offered will be negotiated prior to award.

Wherever possible, the Request for Proposal shall define the performance or benefit required and shall set forth specific criteria to be utilized in evaluation of offers.

Offers will be evaluated by a committee comprised of appropriate parties on the basis of:

- The qualifications of the proposals, established by professional accomplishment and previous experience;
- Aspects of proposals which provide benefit, other than those based on cost; and
- Other provisions of proposals which are determined to serve the best interests of the state.

Nothing herein shall be construed to preclude the possibility of determining an award solely on the basis of cost.

The evaluation of offers, including the weight assigned to various aspects of the offerors, and all award determinations, including the reasons for a selection recommendation, shall be fully documented.

2. Competitive Negotiation

Awards may be competitively negotiated when it is determined in writing by the Administrative Manager of the PSGAO that the proposals received by competitive solicitation either are unreasonable as to all or part of the requirements, or were not independently reached in open competition, and for which each competitive subgrantee has been notified of the intention to negotiate and is given reasonable opportunity to negotiate.

Competitive negotiation may be used in any case where the scope, term, or other requirements of the procurement has not been determined at the time that a requisition is issued, or where optional offers are desired and encouraged, or where the value of the procurement has not been definitively established.

Written or oral discussion shall be conducted with all potential subgrantees who submit proposals determined in writing to be reasonably susceptible of being selected for award. Discussions shall not disclose any information derived from proposals submitted by competing offerors.

Such competitive negotiations shall be conducted under the following restrictions:

- If discussions pertaining to the revision of the specifications or quantities are held with any potential subgrantee, all other potential subgrantees shall be afforded an opportunity to take part in such discussions.
- A request for proposals, based upon revised specifications or quantities, shall be issued as promptly as possible, shall provide an expeditious response to the revised requirements, and shall be awarded upon the basis of the most responsive and responsible proposal.

An award shall be made to the responsible offeror whose proposal is determined in writing to be the most advantageous to the state taking into consideration price and the evaluation factors set forth in the request for proposals.

3. Non-Competitive or Sole Sources

The Administrative Manager of the PSGAO may authorize the award of a contract on the basis of noncompetitive negotiation, where it has been determined in writing that:

- A single or sole source procurement is involved, or
- The product, or market in which a product is sold, is noncompetitive in nature.

Sole source categories may include:

- Items of a unique nature which are unavailable from other sources due to patents or proprietary processes;
- Books, maps, periodicals, and technical pamphlets, films, video and audio cassettes obtained from publishers;
- Certain computer software;
- Licenses - computer software, electronic transmittal;
- Specialized replacement/repair parts or expansion parts necessary to maintain the integrity of system or function;
- Specialized services for which there is only one documented accepted source, such as transactions involving unique professional services and/or educational institutions, e.g., visiting speakers or professors, and performing artists; repair/maintenance agreements with manufacturers;
- Advertisements, public notices in magazines, trade journals, newspapers, television.

Purchase of advertising and public relations campaign services must be established through a competitive selection process.

The Administrative Manager of the Public Safety Grant Administration Office, at his/her initiation or upon the review of a justified request and/or recommendation, make a determination that a category of nonprofit providers constitutes sole source suppliers for certain types of service.

M. Awards and Termination of Awards

1. Awards

Competitive / discretionary awards shall be made within seventy five (75) business days of the close of the application period unless expressly provided for to the contrary in the solicitation. Proposals may not be withdrawn during this period without the express permission of the Administrative Manager of the PSGAO. Non-competitive awards will be made within five (5) business days from the receipt of the application.

While PSGAO employees (grant administrators) directly administer the various grant programs, it is important to note that no PSGAO employee can authorize a grant award. Grant programs are subject to review by a designated advisory committee comprised of individuals representing state, local and private, non-profit entities with expertise in the particular grant program area. The advisory groups, with the support of PSGAO administrators, review federal regulations, develop policy initiatives, and establish program priorities. The advisory committees submit their findings and recommendations to the PSGAO Steering Committee, an eight member executive committee of the state legislated Policy Board. The Steering Committee makes suggestions to the Advisory Committees to ensure that relevant aspects of any identified criminal justice statewide problem will be satisfactorily addressed via grant implementation.

Advisory committees subsequently develop specific Request for Proposals that the PSGAO advertises in the Providence Journal, the PSGAO website and the State of Rhode Island Division of Purchases website and in appropriate local newspapers to notify all potential applicants of funding availability. PSGAO staff also sends RFP packages to existing subgrantees, previously unsuccessful applicants and parties that have requested grant information during the course of the year. Prospective applicants are always allowed a full month to develop grant proposals for submission. For competitive grants, the PSGAO will offer pre-application workshops to discuss the application package. Advisory Committee members review grant applications and make funding recommendations to the PSGAO Policy Board for approval. Once approved, the PSGAO administrator makes grant awards to the successful applicant agencies and then monitors grant performance.

Unsuccessful applicants must be notified prior to the presentation to the Policy Board, allowing sufficient time for the applicant to file a grievance, as set forth in sub-section H. of the Procurement Procedures in this manual.

2. Termination of Subgrant Award

Decision for termination of subgrant funds will be initiated by the Administrative Manager of the PSGAO, with approval of the Policy Board, and will be based upon the subgrantees inability to perform in accordance with the general and/or specific conditions of the subgrant award, or unsatisfactory or non-filing of progress reports or any other reports or statements stipulated under the subgrant conditions.

The Administrative Manager of the PSGAO will notify by letter the highest official responsible for the subgrant award and advise them he/she of the decision to suspend or terminate funding and said letter will cite with specificity the reason(s) for suspension or termination.

The Policy Board can only approve reinstatement of funding after satisfactory compliance has been made by the subgrantee.

IV. GRANT ADMINISTRATION

The PSGAO administers federal grants that are applied for and subsequently awarded to the PSGAO on behalf of the State of Rhode Island. In addition to the federal grants, the PSGAO administers one state grant program, the Rhode Island Neighborhood Crime Prevention Act, conditional upon availability of funds.

A. Administrative Responsibilities – PSGAO Grant Administrator

Each of the federal/state grant programs that the agency oversees require many administrative activities that include (but are not limited to):

- liaise with and staff the appropriate advisory committee(s);
- develop and submit a program plan and application;
- develop an RFP (request for proposals) and subgrant application; review submitted applications;
- present advisory committee recommendations to the Policy Board;
- create subrecipient databases in MS Access; craft grant awards and distribute to subrecipients;
- create and maintain subgrant files;
- liaise with fiscal administrator to process subgrant payments;
- monitor and evaluate programs/projects via both desk audits and on-site visits;
- prepare program progress reports; in accordance with requirements, as set forth in the Office of Justice Programs Financial Guide.
- Comply with Federal Funding Accountability and Transparency Act (FFATA) reporting requirements, if applicable;
- Monitors subrecipients for active Central Contractor Registration
- provide administrative support/technical assistance to subrecipients;
- perform grant closeout and audit procedures; and
- other requirements unique to the various programs.
- create and maintain Grant Binder for each new federal award.

B. Types of Grants

There are several different kinds of grants that the agency administers. They are:

1. Block Grant

A block grant represents a fixed award amount, determined by a formula, made to states to provide assistance to state agencies and local units of government (and potentially private, nonprofit agencies) for programs in accordance with delineated legislative requirements. Block grants tend to have broad purpose areas and a requirement that the PSGAO make complete advance payments to subrecipient agencies. Block grants usually require an annual progress report.

2. Formula Grant

A formula grant represents a fixed award, determined by a formula (usually based on population and/or crime rates), made to states to provide assistance to state agencies and local units of government (and potentially private, nonprofit agencies) for programs in accordance with delineated legislative requirements. Formula grants tend to have more narrow purpose areas and a requirement that the PSGAO make payments to subrecipients on a reimbursement basis. Formula grants usually require comprehensive annual progress reports.

3. Discretionary Grant

A discretionary grant represents non-formula programs that encourage states, units of local government, or private organizations to prepare proposals for consideration. Discretionary grants are very competitive by nature. Awards are made on an arbitrary basis based on the quantity of applications and the relative quality of the proposals submitted. The limited funds available are ultimately dispersed to a few grant recipients. These grants usually have many detailed special conditions and require quarterly categorical progress reports to the federal administering agency.

4. Quasi-Formula Grant

These grants are not common but may combine aspects of block, formula and/or discretionary grants. Quasi-formula grants may have the same amount allocated to each state; and/or may allow for supplemental funding for additional activities. The Statistical Analysis Center Program is an example of a quasi-formula grant. These grants usually require quarterly progress reports.

C. Notice of Grant Program Funding

1. Announcement of Federal Formula Grants

The PSGAO is the designated Rhode Island State Administering Agency (SAA) for the following federal formula grants in fixed funding amounts by the Department of Justice:

- the Byrne Memorial Justice Assistance Grant (JAG) Program;
- the Juvenile Justice Delinquency Prevention Act (JJDP) Grant Program;

- the Juvenile Justice Title V Community Partnership Grant Program;
- the Juvenile Accountability Block Grant (JABG) Program;
- the Victims of Crime Act (VOCA) Victims' Assistance Grant Program;
- the S.T.O.P. Violence Against Women Act (VAWA) Grant Program;
- the Residential Substance Abuse Treatment (RSAT) Grant Program for State Prisoners;
- the Paul Coverdell Forensic Science Improvement Grant
- the National Criminal History Improvement Grant Program (NCHIP)

The Public Safety Grant Administration Office also administers the following quasi-formula grants that are made available to the state in non-definitive funding amounts:

- the Statistical Analysis Center (SAC) Program;

Each of the formula and quasi-formula grant programs follow a different timeline for administration, however, the grant administrator anticipates new formula grant funding and together with the Advisory Committee, begins to update the previous year's plan prior to receiving the federal notice. Most grants maintain a core strategy from year to year.

The PSGAO usually receives notice six to ten weeks in advance of the deadline for submission of the application/plan to the specific Department of Justice agency that oversees the grant program. The notification normally includes the program announcement, specific program guidelines/funding criteria, and a standard federal grant application package.

Each PSGAO grant administrator completely reviews the grant program announcement that he/she is responsible for and discusses the potential impact on the current plan prepared by the administrator and advisory committee. Together, they develop the new plan and the administrator prepares the grant program application.

2. Notice of Availability of Discretionary Funding

Many discretionary grants are also announced periodically by the Department of Justice as Congress approves new programs or attempts to address criminal justice problems not related to a specific formula grant. Discretionary grant programs are competitive in nature. States, counties and municipalities submit proposals with no guarantee of funding. The PSGAO may apply for the funding on behalf of potential beneficiaries.

The recommendation to apply for a discretionary grant must be approved by the Administrative Manager. The PSGAO will only approve such an application if the eligibility criteria dictates that a state agency be the applicant.

Staff of the PSGAO become aware of many funding opportunities, both public and private, that may be of interest to other state agencies, local units of government and

private, nonprofit organizations. PSGAO staff will, when time permits, pass along funding information to the appropriate agencies.

3. Notice of Availability of State Funding

In addition to the federal grants, the PSGAO administers one state grant program:

- the Rhode Island Neighborhood Crime Prevention Act.

The Crime Prevention program funds are included in the PSGAO's operational budget and are available for program activities at the beginning of the state fiscal year, conditional upon the availability of funds.

D. Advisory Committees

The PSGAO Administrative Manager and grant administrators do not make funding decisions. PSGAO grant administrators directly manage the various grant programs with the input of the designated advisory committees. Individuals with expertise in the grant program area comprise the membership of the various advisory committees. Representation includes state, local and private-non-profit entities. No advisory committees exist for those grant programs that are intended solely for distribution to one or two state criminal justice agencies, i.e. RSAT. In this instance, the two agency directors work out an acceptable distribution of funds. If there is a dispute as to the distribution, the Steering Committee will make the final funding recommendations.

The following advisory groups work with the appropriate PSGAO grant administrator to develop policy initiatives, establish program priorities (with input from the PSGAO Steering Committee), make funding recommendations to the Policy Board and monitor the progress of subgrantee agencies:

- the Juvenile Justice Advisory Committee (JJAC);
- the Victims of Crime Act (VOCA) Advisory Committee;
- the S.T.O.P. Violence Against Women (VAWA) Planning Committee (includes the Subcommittees: Law Enforcement Training; and Curriculum Development);
- the Crime Prevention Planning Committee (CPPC);
- the National Criminal History Improvement Program (NCHIP) Committee;
- the Local Law Enforcement Planning Committee; and
- the Technology Advisory Committee (TAC) with several ad hoc subcommittees.

The grant administrator acts as staff to the Advisory Committee and is responsible for taking minutes at all committee meetings.

1. Membership

Membership on most Advisory Committees is determined by identifying and including members from a representative sample of those agencies, both public and private that ensure pertinent issues are addressed fully, impartially and completely. Committees may have certain membership requirements set forth by the federal granting authority. In such cases, the grant administrator, with the assistance of the the advisory committee, will recommend all federally mandated members for appointment.

The Governor, Policy Board Chair, or Administrative Manager can appoint members to an Advisory Committee, with the exception of those with membership requirements set forth by the federal granting authority, such as the Juvenile Justice Advisory Committee.

2. Meetings

Advisory Committee meetings are normally scheduled at least a month in advance and on an average of six to eight times per year, depending on the various committees' needs. All meetings are subject to the RI Opening Meetings law and must be handicapped accessible.

3. Notices

Meeting notices for all grants programs are mandatory. They are to be uniform and include all pertinent information such as: main agenda items, votes to be taken, date, time, and location. The grant administrator's name and contact number are also to be included.

The meeting notice is to be posted at least one week in advance at no less than the three following locations: the PSGAO, the 1st floor in the Department of Administration (outside the bank of elevators) and one copy to the State House library for posting on the public bulletin board. The meeting notices are also filed with the Secretary of State electronically at least 48 hours in advance of the meeting, pursuant to Rules and Regulations adopted by the secretary of State pursuant to Title 42, chapter 46 og the General Laws of R.I., as amended.

Grant administrators must mail, fax or e-mail copies of the minutes along with the meeting notice to all committee members a minimum of one week prior to the meeting to allow sufficient time for review of materials.

4. Minutes

The grant administrator is responsible for ensuring that minutes of all committee meetings are taken. Minutes may be assigned to a secretary elected by the committee. Minutes must contain: the date, time and location of the meeting, the name of the advisory committee and grant, members present, a general description of discussions and a specific record of all votes and/or decisions arrived at by consensus. All recommendations for funding are to be in the form of a motion with a vote ensuing. Motions are to be recorded verbatim indicating the proposer, the seconder and those members voting "nay" or abstaining. Some committees (such as TAC) may make decisions by consensus at the

approval of the Administrative Manager. However, decisions are still to be recorded and any pertinent discussion or opposition must be noted.

The minutes of Policy Board meetings must be electronically filed with the Secretary of State through the Secretary of state's Open Meetings webiste according to protocols set forth by the Office of the Secretary of State.

Copies of minutes are to be included in a section of the grant binder and retained with all of the federal grant files for the particular grant year. All grant files are to be retained for a period of three years after the Single audith Report has been filed for the fiscal year during which the grant has been officially closed by the original funding agency and the final Financial Status Report has been filed with the Office of the Comptroller.

5. Plan Development/Approval

Once an Advisory Committee reviews the newest grant program announcement, it meets to develop specific funding strategies that are based on the grant's delineated eligible priority areas. The grant administrator and Advisory Committee Chair (or other designated committee member) meets with the PSGAO Steering Committee to present the plan. The Steering Committee reviews the Advisory Committee's plan and either approves the plan or makes recommendations to ensure that relevant aspects of any identified criminal justice system problem will be addressed. Specifically, the Steering Committee may direct that any RFP include specific language requiring a focus on certain projects or activities.

Upon Steering Committee approval, the grant administrator submits the plan and application to the appropriate federal office for review and approval.

6. Plan Submission

All applications are to be submitted to the Office of Justice Programs electronically via the Grants Management System (GMS), or through Grants.Gov when required.

7. Receipt/Acceptance of Grant Award

Normally, it takes upwards to two months for the plan to be approved and an official federal award forwarded to the PSGAO after submission of the plan/application to Washington. Upon receipt, the Administrator reads all special conditions and advises the Administrative Manager of any concerns. Usually, there are two original grant award documents. The Administrative Manager signs both awards. The grant administrator immediately forwards one original award to the federal granting office and files the other

original award in the Grant Binder. The administrator also forwards a copy of the award to the Central Business Office for processing.

E. RFP/Application Process

1. Display Advertisement

Once the Steering Committee has provided its input, the Administrator finalizes the RFP and application package.

- The RFP is advertised at least once in the Providence Journal, preferably on the highest circulation days of Sunday and/or Wednesday. The display ad is usually two columns wide by 5 to 8 inches tall. The PSGAO requests that the ad be placed in either the main section (front page) or the local section (regional) of the paper.
- The RFP is also advertised on the PSGAO website and the State of Rhode Island Division of Purchases website.
- Display advertising is normally charged off to the particular grant program's administrative account. Be sure sufficient funding exists for ad prior to placing the order.
- The RFP identifies the grant program, the federal (or state) fiscal year, the amount of funds available, the federal program priorities, selection and evaluation criteria, notice of a pre-bidders' conference (if required), grant submission deadline, number of application copies required, PSGAO address and contact name and telephone number.
- The advertised RFP must allow a minimum of one full month between advertised date and deadline for submission of proposals.
- All advertisements for RFP's must be approved by the Administrative Manager prior to publication.
- The Administrator must have application packages and/or related materials available in sufficient quantities on or before the RFP is advertised. The administrator is to provide a copy of the advertisement and the application package to the Administrative Manager, the Grants Assistant and the Administrative Assistant prior to the publication of the RFP ad.
- A sufficient quantity of application packages are to be placed in a designated location within an area of public access for the life of the RFP cycle.

2. Automatic Notification

The grant administrator automatically forwards a copy of the RFP/application to all existing subrecipients of the grant program. Further, RFPs are to be mailed to any agency or individual that had requested same since the last RFP.

3. Pre-Bidders' Conference

For all RFP grants, the Grant administrator schedules a pre-bidders' workshop shortly after the RFP is advertised (within 7-10 days). Depending upon the grant program and the decision of the Advisory Committee, the workshop may be mandatory or optional. However, there must be suitable reasons to designate a pre-bidder's workshop as mandatory. Designations of mandatory participation workshops should be discussed with the Administrative Manager.

Prospective sub-recipients that do not send a representative to a mandatory pre-bidders' workshop are not eligible to apply. Any application submitted by a group that has missed a mandatory pre-bidders' workshop will be not be distributed to committee members for consideration.

At the pre-bidders' workshop, the Grant administrator discusses all relevant aspects of the subgrant application focusing on the federal intent of the grant program and the state's specific selection and evaluation criteria. The Administrator will describe the application pages thoroughly. The goal of the workshop is to ensure that all prospective subgrantees understand the application and complete it in a timely and accurate manner. All prospective applicants will further be briefed on the provisions of the grant conditions and assurances that they will have to comply with if selected for funding. Included in this briefing will be the provisions of Title VI of the Civil Rights Act of 1964, Executive Order No. 13279 and Justice Department Regulations 28 C.F.R. pt. 38 which seeks to prevent discrimination of faith based organizations, protect the organization's autonomy while ensuring no federal funds are used to engage in inherently religious activities (i.e. praying, proselytizing, etc).

All questions by the attendees are answered to the best of the Administrator's ability. Should there be any significant clarification requiring research by the Administrator, a written response is provided to all attendees within 7 days of the session. Normally, no telephone calls to the Administrator are allowed after the bidders' conference regarding the application. The Administrator may use his/her discretion, however, in answering certain questions that would not give other prospective applicants an advantage over competing proposals.

4. Submission of Applications to PSGAO

The Grant administrator accepts applications up until the deadline for submission. The original application is date stamped upon receipt by the Administrator or other PSGAO staff. Agencies hand-delivering applications are provided a photocopy of the original date stamped cover as proof of receipt. The Administrator anticipates the influx of applications and prepares a holding area for submitted applications and communicates this to other PSGAO staff.

The Administrator accepts the grant applications and logs them into a program abstract computer database. The abstract database includes the name and address of the agency, proposed project title, a brief project description and amount requested.

Important Note - Under no circumstances can anyone other than the chief elected official or agency director apply for a grant. Should any other agency representative sign the grant application, the grant administrator should return the application and request that the appropriate official sign the application. However, an application submitted at deadline without the appropriate signature (or with other omissions) may cause the application to be rejected. The Advisory Committee may, however, allow an application to be amended should it deem the proposal worthy of consideration. Should this be the case, the grant administrator would request that the applicant agency make the appropriate amendments and resubmit the document prior to an awards being made.

Late Submissions - Mailed applications must be received at the PSGAO by the deadline day or subsequently with a postmark no later than the deadline date. Those applications received after the deadline or without the appropriate postmark date, will usually be rejected and not reviewed or considered for funding. With the recommendation of the grant administrator, only the Administrative Manager can allow for a waiver of the late submission policy. An exception may be made based on special circumstances and conditions, taken on a case by case basis.

5. Grant Review

The grant administrator disseminates copies of the applications to the various Advisory Committee members. An administrator may require an original application with a sufficient number of copies for distribution to committee members. If insufficient copies of application exist, the grant administrator must make the appropriate number of copies. Normally, each committee member reviews and rates all grants. Any other system whereby all grants would not be reviewed and rated by all committee members will require the approval of the Administrative Manager.

Sufficient time must be allowed for committee members to review the grants, usually one to two weeks at a minimum.

Rating Sheets – The PSGAO generally utilizes standardized ratings forms to objectively review grants applications. Grant administrators and their advisory committees may wish to include additional criteria unique to their specific grant program. This is an acceptable procedure, however, the unique criteria should be discussed with the Administrative Manager. Advisory Committee members utilize the rating sheets to assign point values to various sections of the application as detailed in the RFP. Committee members submit the rating sheets to the Administrator who averages the scores and creates a list, ranking the various proposals. The very critical computations must be checked by one other PSGAO

employee. All PSGAO staff checking the computations are to initial and date a printout of the figures.

An Advisory Committee may choose to eliminate from consideration those proposals that score below an arbitrary “cut-off” point. Those grants that survive the “cut” are then discussed at subsequent committee meetings. The Committee may then decide to pare budget line items or amend programmatic activities for any grant proposal in order to bring the total funding requests into line with available grant funds. The Administrator makes note of both discussions and votes and records them in the minutes of the meeting.

Retention - All meeting minutes and rating sheets are to be kept with the original federal grant file and retained as long as required by state and federal mandate.

Unsuccessful Applications – All rejected applications for funding are to be kept with the original federal grant file and retained as long as required by state and federal mandate. Successful applications are filed in their individual grant folders.

Policy Board Involvement - Once the Advisory Committee has determined its funding recommendations, the Administrator creates a detailed summary following the standard mail merge ready form consistent with all other grant awards in style and format. The summary will include all applicants, successful and unsuccessful, the agencies’ funding history (under the specific grant program), comments from the Advisory Committee and specific recommended funding allocations. This summary is derived from the original grant database. The administrator submits the summary to the Administrative Manager for review and approval. Approved grant recommendation summaries are mailed or faxed to members of the Policy Board for consideration at least a full week in advance of the next scheduled Policy Board meeting by the Administrative Manager.

The Chair of the Advisory Committee and/or the grant administrator attend the Policy Board meeting, present the committee’s recommendations and entertain questions regarding the grant review process and the funding recommendations. The Policy Board then votes to approve the recommendations.

F. Subgrant Awards

1. Create Draft Award Documents

Grant Summary – Create a one page summary of each approved project following the standard mail merge ready form consistent with all other grant awards in style and format. Be sure that all fields have data inputted.

Grant Award – The Grant Award should be the standard mail merge ready form consistent with all other grant awards in style and format. Specific grant information can be merged along with other subrecipient information and/or added to the merged document.

Important Note: The end date for all grant awards must coincide with the end of the state fiscal year, nothing before, even if the project is slated to end prior to the state fiscal year. This practice allows programs more time to encumber and expend grant funds.

5. Approval of Awards – Administrative Manager

Award Letter - Prepare award transmittal letter from Administrative Manager to the chief elected official or agency director, whichever is the authorized agency official that signed the grant application.

Award Process - Place one unsigned award in subrecipient grant folder as a placeholder and have the Administrative Manager sign the remaining three (3) awards and cover letter. Submit the grant award packages to the Administrative Manager in the order and or/format requested. Once documents are signed and returned to the grant administrator, forward the letter of transmittal, the three original awards (and three (3) original cooperative agreements in the case of state agencies) and all appropriate report forms (fiscal and programmatic) to either the chief elected official or project director.

Note - A grant administrator may choose to send the award sets to the project director rather than the agency director if that would be beneficial in expediting the award acceptance process. Nonetheless, the awards still need to be signed by the CEO.

Make two copies of the signed letter. File one in the appropriate section of the subgrantee folder and submit one copy to the Administrative Manager's Executive Assistant. One letter, if standard, may suffice for the Director's correspondence file as long as a list of recipients is attached.

Note – If an agency is receiving more than one grant, combine information on all grants in one letter and mail all grants in one envelope.

Upon receipt of the signed awards from the subgrantee agency, the grant administrator forwards one set to the Central Business Office which sets up the official state account while one original set is filed in the main subgrant file folder.

Cooperative Agreement - Create a one page cooperative agreement for each state agency project. The end date for all cooperative agreements must coincide with the end of the state fiscal year, even if the project is slated to end prior to the end of the state fiscal year. This practice allows subrecipients more time to encumber and expend grant funds without the grant administrator having to execute an amended grant and/or cooperative agreement.

Note - It is allowable to run a project's end date out past the next fiscal year end if the program's timeline dictates.

G. Subgrant Files

1. Subgrant File Folder

The Subgrant file folder is a six-part pressboard folder and is created at the time that the grants are being processed. Using the grant database, merge the state subgrant number, recipient agency name and project title on a file folder label and place on the raised tab of

<p>Coventry Police Department 96-SI-106 Justice Link</p>

the file folder for ease of identification (see illustration below).

The “96” is the federal grant year. The “SI” is an abbreviation for the grant program and the “106” is an arbitrarily designated grant number. Grant numbers should be three numbers and ideally be designated in a sequential order. If an agency has more than one project in any given grant year, the administrator may wish to include a brief project title to differentiate the folders (see Justice Link above).

The folders for all grants in one fiscal year should all be the same color unless specific circumstances dictate the use of various colors. Each subgrant file folder, regardless of grant program, is organized in the same fashion as follows:

- Inside Cover (left) – Grant Application submitted by sub recipient;
- Inside Cover (right) – Grant Award (with cooperative agreement for state agencies as page three of the award document);
- Middle Section (left) – Financial status reports, most recent on top;
- Middle Section (right) – Reimbursement Requests, most recent on top;
- Back Section (left) – Program progress reports (most recent on top) and any press clippings;
- Back Section (right) – Grant correspondence, to and from subrecipient.

This uniformity of arrangement ensures that if one wished to peruse a grant, one would expect to find the same type of information, in the same place as in all other PSGAO grant files. This is essential should the Administrative Manager, or other interested party (auditor, federal liaison) need to locate specific information about any particular grant.

2. Reimbursements

The grant reimbursement request form is completed by the subrecipient and forwarded to the grant administrator along with a current fiscal report for review and approval. Upon approval, the grant administrator forwards the request, with the fiscal report, to the Administrative Manager for final approval and signature

3. Monitoring

Each grant administrator is required to fully monitor the performance of all subgrantee programs to ensure fiscal accountability and programmatic integrity. It is the responsibility of the grant administrator to assist the subgrantees in implementing the approved projects within a framework of relevant state and federal statutes, regulations, policies, procedures and guidelines so as to achieve maximum success. Grant proposals are required to include a budget narrative and measurable objectives. The main reason to monitor is to ensure that grant funds are expended according to the approved project budget and that activities and purchases are impacting stated objectives.

Risk Assessment of Subgrantees – The purpose of risk assessment of subgrantees is to create a proactive system to insuring programmatic and fiscal success of subgrantees during the monitoring process. It is an acknowledgment that some subgrantees might need additional assistance to implement a successful project.

- A program receives a risk value based on circumstances of the grant, past performance, individual situations, information gathered during the application or monitoring process and other criteria deemed relevant by the grant administrator. Utilizing a risk assessment tool a program is given a numeric value which will indicate if the program is high risk, medium risk or low risk
- Based upon the assigned value and identification of risk level as a high risk subgrantee the grant administrator will conduct a minimum of one site visit and additional desk audits as necessary; a medium risk subgrantee will receive a site visit or desk audit and a low risk subgrantee might receive a site visit, a desk audit or might not be monitored by either during that grant period..

There are three types of monitoring that can be used: on-site monitoring, desk reviews and phone monitoring.

- Desk audit - Grant Administrator requests various supporting documents from the subgrantee, such as invoices and receipts, contracts, timesheets and ledgers. Documentation is reviewed to ensure that the subgrantee has implemented the grant program according to relevant state and federal statutes, regulations, policies, procedures and guidelines.
- Telephone Monitoring – Takes the desk audit a step further by contacting the project staff to discuss grant activities and project status. Prior to the telephone monitoring call the grant administrator will review the file and compile a list of issues to discuss.
- On-site visit at agency or location of subgrant program. Face to face interaction with project staff to discuss specific issues related to the project, such as progress on goals and objectives, financial, and personnel issues. This also allows the grant administrator

to observe grant activity, review files and develop or continue a collaborative relationship between the state administering agency and the subgrantee.

Regardless of the type of monitoring used, a monitoring worksheet summary is to be completed by the grant administrator and filed in the subgrantee folder.

4. Site Visits

Grant administrators are to perform site visits annually with a goal of visiting all funded programs in each three year period. Further, should concerns exist regarding a subgrantee's financial records or practices, the PSGAO Financial Agent may be called upon to review the grant file and/or accompany the administrator on a site visit. Schedule site visits after consulting with the subgrantee for a mutually agreeable time. Confirm the site visit, in writing under the Administrative Manager's signature, as soon as the visit has been arranged. Be sure to forward written correspondence to the project director.

- **Site Visit Preparation** - It is critical for the grant administrator to prepare for on-site monitoring visits. This includes compiling materials to bring to the site visit and reviewing the subgrantee's files. The grant administrator should identify any missing progress or financial reports, check for unmet special conditions of the grant award, review overall goals and objectives of the project and develop a checklist of issues to be discussed.
- **Conducting the Site Visit** - The grant administrator will utilize a monitoring tool developed for the grant program in conducting the site visit. In addition to administrative and financial issues the grant administrator will solicit any needs for technical assistance from the subgrantee.
- **Site Visit Follow Up** – Within ten business days of the site visit a monitoring report must be prepared for the grant file, along with a follow up letter to the subgrantee. The report must identify the issues reviewed for compliance, any findings, any recommendations for corrective action and a deadline for completing the corrective action. The grant administrator will report immediately any major concerns, such as fraud, waste and abuse as well as any potential violations of federal guidelines concerning civil rights as set forth in state and federal statutes.

5. Mandatory Reports

All reports that are mandated in the grant regulations or in the special conditions, including periodic progress reports and quarterly Federal Financial Status Reports (SF-

.425) will be filed in a timely manner according to the requirements as set forth in the individual grant.

6. Retention of Records

Records to support all expenditures charged to federal grants, including time and attendance reports for all individuals reimbursed under the award will be retained for three (3) years after the submission of the closure of the single audit report which covers the entire award period. All records pertaining to federal awards are maintained in accordance with the requirement set forth in 28 C.F.R. parts 66 and 70. and the retention schedule on file for the agency at the Rhode Island Secretary of State Office.

H. Equal Employment Opportunity and Civil Rights Policy and Procedures

1. EEO Policy

INTRODUCTION

The purpose of an Equal Employment Opportunity and Civil Rights Plan (EEOP) is to ensure full and equal participation of men and women in the workplace of the recipient agency, regardless of race, color or national origin. A recipient agency is defined as any State or local unit of government or agency thereof, and any private entity, institution, or organization, to which Office of Justice Programs (OJP) financial assistance is extended directly or through a government entity such as the Delaware Criminal Justice Council.

CRITERIA

Recipient agencies that meet all the following criteria are required to maintain an EEOP on file for review by OJP, if requested (see 28 CFR §42.301 *et seq.*) and complete Section B of the attached EEOP Certification Form:

- a. have 50 or more employees, and
- b. received a total of \$25,000 or more in grants or sub-grants; and
- c. have 3 percent or more minorities in service population (however, if less than 3 percent minorities in service population, and EEOP must be prepared, but must focus on employment practices affecting women only).

Agencies that meet criteria (a) and (c), and that receive over \$500,000 (or \$1 million during an 18 month period) are required to submit an EEOP to the **Office of Justice Programs (OJP), U.S. Department of Justice, Office for Civil Rights, 810 7th Street N.W., Washington D.C. 20531** for review.

PLAN ACCEPTABILITY

Comprehensive guidelines for developing an EEOP can be found at 28 CFR § 42.301 *et seq.* For more information and a guide to the design and development of an Equal Employment Opportunity Plan consult the Office for Civil Rights (OCR) website at www.ojp.usdoj.gov/ocr

Submissions of the EEOP vary depending on the entity type, number of employees and funding level of a grantee agency. The following guidelines should be used to determine what information, if any, must be submitted to Office for Civil Rights (OCR).

An EEOP must be developed by each grantee with 50 or more employees that receives an award of \$25,000 or more either directly from the Office of Justice Programs (OJP) or as a sub-grant from a state planning agency such as the Commission. An agency must submit a copy of its EEOP or EEOP Short Form to OCR if it is receiving a single grant award of \$500,000 or more or an aggregate of grant awards for \$1,000,000 or more during an 18 month period and has 50 or more employees. If an agency has 50 or more employees and is receiving a single award for at least \$25,000, but less than \$500,000, the agency is not required to submit the EEOP to the OCR but required to complete Section B of the attached EEOP Certification Form and submit it to the OCR.

If the agency is receiving a single award for at least \$25,000, is a non-profit organization, educational institution, Indian tribe, or medical institution it is exempt from the EEOP requirement. The agency must, however, complete Section A of the EEOP Certification Form and submit it to the OCR.

All agencies must forward to the OCR a copy of any finding for discrimination made against their agency after a due process hearing (within the past five years) within 30 days of such finding.

2. Discrimination Complaint Procedures

INTRODUCTION

This policy establishes the procedures for Rhode Island Public Safety Grant Administration Office (PSGAO) employees to follow when they receive a complaint alleging discrimination from employees or clients, customers, program participants or consumers of a PSGAO subrecipient implementing funding from the U.S. Department of Justice (USDOJ).

POLICY AND PROCEDURES

PSGAO adheres to the policy that all individuals have the right to participate in programs and activities operated by PSGAO and PSGAO subrecipients regardless of race, color, national origin, sex, religion, disability, and age. To that end, PSGAO will ensure that PSGAO and its USDOJ-funded subrecipients are in compliance with the following statutes and regulations:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin in the delivery of services (42 U.S.C. § 2000d), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart C;
- The Omnibus Crime Control and Safe Streets Act of 1968, which prohibits discrimination on the basis of race, color, national origin, religion, or sex in the delivery of services and employment practices (42 U.S.C. § 3789d(c)(1)), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart D;

- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (29 U.S.C. § 794), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart G;
- Title II of the Americans with Disabilities Act of 1990, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (42 U.S.C. § 12132), and the DOJ implementing regulations at 28 C.F.R. Part 35;
- Title IX of the Education Amendments of 1972, which prohibit discrimination on the basis of sex in educational programs (20 U.S.C. § 1681), and the DOJ implementing regulations at 28 C.F.R. Part 54; and
- The Age Discrimination Act of 1975, which prohibits discrimination on the basis of age in the delivery of services (42 U.S.C. § 6102), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart I.
- The DOJ regulations on the Equal Treatment for Faith-Based Organizations, which prohibit discrimination on the basis of religion in the delivery of services and prohibit organizations from using DOJ funding on inherently religious activities (28 C.F.R. Part 38).

These laws prohibit agencies from retaliating against an individual for taking action or participating in action to secure rights protected by these laws.

Definitions:

1. **Complaint Coordinator** – person designated by PSGAO to ensure that received complaints are acted upon in a timely manner.
2. **Discrimination** – unfair treatment of one person or group, usually because of prejudice about race, ethnicity, age, religion, disability or gender.
3. **Retaliation** – the act of harassing, threatening, demoting, firing or otherwise negatively targeting a complainant as a direct result of the discrimination complaint.

Complaint Procedures:

An employee or client, customer, program participant, or consumer of PSGAO subrecipient implementing funding from the USDOJ may submit a complaint of discrimination regarding the subrecipient to the PSGAO. The complaint must be in writing and sent to the Executive Director.

The complaint must contain at a minimum the following information:

1. Name of complainant
2. Contact information for complainant

3. Name of entity against whom the complaint is about
4. Contact information for entity, including name of person to contact (if possible)
5. Type of complaint (race, color, national origin, age, religion, disability or gender)
6. Date(s) of discrimination for complaint
7. Description of discrimination (what happened) to cause need for complaint

Processing Complaint Procedures

1. The Administrative Manager shall serve as the Complaint Coordinator.
2. If an employee or client, customer, program participant, or consumer of PSGAO subrecipient contacts a PSGAO employee and wishes to file a complaint of discrimination against a PSGAO subrecipient, the PSGAO employee shall instruct the complainant to submit the complaint in writing in accordance with the procedures discussed above.
3. The PSGAO employee who receives the complaint shall route the complaint to the Complaint Coordinator.
4. The Complaint Coordinator shall provide written acknowledgement of the complaint to the complainant with an explanation of the PSGAO process and that the complainant shall be kept informed throughout the investigation.
5. If the complainant is a client, customer, program participant or consumer of subrecipient, the Complaint Coordinator shall review the complaint and forward it to the appropriate authority team for further review
6. The Complaint Coordinator shall conduct a more extensive review of the complaint which may include contacting the complainant for more details as well as the entity about whom the complaint was filed. The review team may include the PSGAO grant administrator from the PSGAO. The Complaint Coordinator shall determine if the complaint is valid and if so, the complaint shall be referred to RI Department of Public Safety Office for Legal Counsel for investigation. If the Department of Public Safety is either the agency about which the complaint is filed or has a conflict, the complaint shall be referred to the Office for Civil Rights, Office of Justice Programs, DOJ.
7. If the complainant is an employee of an PSGAO subrecipient, the complaint coordinator shall review the complaint and may refer the employment discrimination complaints against a subrecipient to the U.S. Equal Employment Opportunity

Commission (EEOC) or the Rhode Island Office of the Attorney General, Office for Civil Rights, or the Office for Civil Rights (OCR), Office of Justice Programs, (OJP), DOJ. If the RI Department of Public Safety is the agency about which the complaint is filed or has a conflict, the complaint shall be referred to the EEOC or the OCR.

8. PSGAO shall notify OCR in writing of the complaint:

- a. Name of complainant
- b. Entity named in the complaint
- c. Description of the complaint of discrimination
- d. Steps being undertaken to investigate and resolve complaint

9. PSGAO shall notify the complainant that he/she may file a complaint directly with the OCR at the following address: **Office for Civil Rights; Office of Justice Programs; U.S. Department of Justice; 810 Seventh Street NW; Washington, DC 20531.**

Notification Procedures

The RI Public Safety Grant Administration Office will communicate these procedures to each subrecipient and post these procedures on the PSGAO web site to notify PSGAO employees and PSGAO subrecipients of the appropriate procedures for processing complaints of discrimination from employees or clients, customers, program participants, or consumers of PSGAO subrecipients implementing funding from the USDOJ.

Monitoring Subrecipients' Response Procedures

As part of a grant program review, staff will review the sub recipient's procedures for responding to discrimination complaints that employees and clients, customers, program participants or consumers of the subrecipient have filed directly with the subrecipient. If the procedures do not exist or are found to need improvement, the report to the subrecipient will note the findings.

At a minimum, the sub recipient's response should include:

1. Acknowledge complaint receipt to complainant in writing
2. Indicate which external agency will be forwarded the complaint for investigation (PSGAO, OCR, EEOC or local or state human rights commission)
3. Timeframe by which to forward complaint

4. Notify PSGAO of any discrimination complaint not referred to the PSGAO for investigation
5. Notify complainant that a complaint of discrimination may be filed directly with PSGAO, EEOC or OCR and where to locate those procedures.

Training

PSGAO will provide periodic training for all employees regarding the discrimination complaint procedures. The procedures will be placed in the PSGAO Policy and Procedure Manual for access by all PSGAO employees.

1. The initial complaint procedures will be disseminated to all PSGAO employees.
2. All subsequent updates to these procedures will be reviewed by employees in the same manner as the initial procedures.
3. The updated procedures will replace outdated policies and procedures in the manual and on the PSGAO web site.

PSGAO will facilitate civil rights requirements training for subrecipients. Such training may be arranged:

1. In conjunction with grant writing / management training;
2. At the request of the subrecipient; or
3. As a result of a grant program review.

V. General Responsibilities

A. Files

1. Computer

All grant documents are to be filed on the shared network drive. Copies may be retained on individual administrators' hard drives.

There should be one main folder for each grant program, i.e. Byrne, JJDP, VOCA, VAWA, etc. Within that main folder, there should be sub folders with each grant year. All documents pertaining to that particular grant year are to be filed within. There may be any number of sub folders that the grant administrator deems necessary to accurately file documents. For example, a typical Byrne grant year folder contains the following sub folders: awards, cooperative agreements, plan, letters, conference, and minutes.

2. Awards

Grant award files from any one grant year should occupy one drawer in the grant administrator's *file cabinet and be stored in alphabetical or numerical order. The drawer is to be labeled with the grant name and federal year.* All grants are to be returned to the drawer when not in use.

Grant files should only be removed from the office for purposes of an on-site subgrantee monitoring visit.

B. Conference Planning

Conferences, workshops, seminars or other types of training sessions are critical PSGAO endeavors. Strict planning and PSGAO staff cooperation and coordination are absolutely essential to ensure that an PSGAO function is successfully implemented. All conference planning should be in compliance with provisions for conference expenditures in the Office of Justice Programs Financial Guide.

Conferences may be proposed by advisory committees, grant administrators or the Administrative Manager.

1. Timing

Normally, conferences are planned anywhere from 4-12 months in advance. All conferences must be approved by the Administrative Manager before any substantive planning takes place or major decisions made.

2. Dates and Venue

Select the date and venue at the soonest possible opportunity.

The selection of a date should be given careful consideration. The conference planner should check extensively to determine if there will be any significant event or meeting conflicts with the target date. Further, the date may be affected by the availability of a particularly desired venue.

Depending on the project's anticipated budget and the prospective number of attendees, free venues such as the Community College of Rhode Island for larger functions and the Departments of Administration, Health or MHRH for smaller functions should be considered. Parking is another major consideration.

3. Budget

It is critical to determine the event budget and source of funding at the outset of the planning process. The most significant event expenses include room rental, food/refreshments, and printing. If grant funds are to be used, the specific advisory committee must approve the project and anticipated budget expenditures.

4. Other Tasks

- Notify all PSGAO staff of conference and date
- Compose and send a "save the date" card to all targeted conference participants once the date and venue have been selected and confirmed.
- Develop the program agenda.
- Contact all potential workshop speakers and presenters then confirm participation in writing.
- Enlist the support of PSGAO staff for event preparation and implementation, i.e. creating brochure/registration mailer, staffing registration table, etc.
- Mail/fax registration brochure/flyer no later than one month in advance of function. Note: Registrations should be designed to be one page faxable.
- Create a registration database. Consult with office manager on appropriate format.
- Prepare art for: name badges, agenda, signage, and table tent name panels.

C. Travel

1. Out of State Travel

There are many conferences, workshops, training sessions, seminars that target PSGAO staff. Some are sponsored by the federal granting agencies but many others are hosted by state, regional or national organizations/associations. Some grant awards (JJDP, VAWA) may stipulate in special conditions that certain conferences/events are to be attended by the grant administrator or SAA representative.

a. Approval

The grant administrator must seek approval from the Administrative Manager to attend an out of state function.

b. Arrangements

The traveler must coordinate his/her travel request with the executive assistant and provide all requisite information including: event brochure, agenda, preferred travel times, etc. Arrangements will be made pursuant to approved procedures in use at the time.

c. Reimbursement

In order to facilitate the processing of Travel Expense Vouchers submitted for payment by the State of Rhode Island, the following conditions must be followed in order to receive reimbursement:

- If traveler is not a state employee, a W-9 for will need to be completed prior to traveling;
- Retain original boarding passes, tickets, original hotel receipts, and any original receipts for parking or ground transportation (i.e. taxis, shuttles);
- Retain a copy of the conference agenda;
- Hotel and flight (or rail, bus) arrangements will be pre-paid by the State of Rhode Island through a Master Price Agreement with an approved travel agency vendor;
- Hotel payments only will be paid using a Department of Public Safety Hotel Credit Card, obtained from the Central Management Office of DPS. No other charges will be allowed on this card.
- If it is necessary to cancel a trip, the approved vendor must be notified as soon as possible prior to trip departure date to avoid jeopardizing the refund process.
- Meals will be reimbursed at the currently approved rate as determined by state policy. Reimbursement above that rate will not be allowed.

2. In State Travel

Grant administrators may have need to travel in-state to perform site visits or attend meetings.

a. Daily Log

If a PSGAO employee expects to be reimbursed for in-state mileage, he/she must fill in the date, time, destination and expected return time in the daily log book that resides in the office. This log was established at the recommendation of the Bureau of Audits to provide a back-up to employees requests for travel reimbursements

b. Calendar

All out-of-the-office meetings are to be posted on the planning calendar.

c. Reimbursement

All in-state travel reimbursement is the responsibility of the traveler. Travel reimbursement forms are to be filled out for the Administrative Manager's approval and then forwarded to the Central Management Office of DPS for processing.

D. Time and Attendance Records

Pursuant to OMB Circular A-87, employees paid with Federal grant funds will complete personal activity reports (Time sheets) to document the amount of time spent on grants. The standard time sheet, adopted by the PSGAO, will be utilized and should reflect an after-the-fact distribution of the actual activity of the employee on a weekly basis, signed by the employee, and approved by the Administrative Manager.

VI. Fiscal Administration

The following is a list of personnel who have accounting responsibilities with the Public Safety Grant Administration Office.

Grant Administrator

- Creates grant file folder
- Monitors sub-grantees expenditures to assure compliance with grant parameters, accuracy and timeliness of reimbursement requests, source of local match and provisions for monitoring of subrecipients as set forth in the OJP Financial Guide.
- Processes payments requests from subrecipients
- Forwards approved payment requests to Administrative Manager
- Checks for subrecipients Central Contractor Registration
- Complies with Federal Funding Accountability and Transparency Act (FFATA) reporting requirements
- Prepares and submits Recovery Act 1512c reports
- Tracks grant expenditures by approved budget categories
- Prepares and submits grant closeout packages in web based Grant Management System.

Grant Administrative Assistant

- Processes payments in state financial accounting system (RIFANS)
- Monitors and requests changes to purchase orders as needed
- Reconciles financial folders with ledgers quarterly

Administrative Manager

- Reviews payment requests received from grant administrators
- Draws down funds to cover payments
- Maintains ledgers for each grant program recording grant revenues and expenditures in the accounting system including program income and local match.
- Prepares and submits quarterly Federal Financial Reports, reconciling FFRs with accounting records at least on a quarterly basis.
- Advise necessity to and perform site visits and or desk audits of subrecipient agencies for purposes of monitoring compliance with grant's fiscal requirements

Director of Finance, Central Management Office

- Prepare annual budget
- Create purchase order requests through Division of Purchases
- Deposit funds drawn down by Administrative Manager into appropriate account in state's financial system
- Maintain payroll records

Payment Process

- All payments to subrecipients are made on a reimbursement basis, with appropriate backup documentation for the expenditures
- Grant administrators receive reimbursement requests from subrecipients, ensure that documentation is sufficient, accounting is accurate, all programmatic and fiscal progress reports have been filed and forward the requests to Administrative Manager
- The Administrative Manager reviews the reimbursement request, signs them as approved and provides a copy to the grant administrator.
- Administrative Manager draws down funds utilizing the federal Grant Payment Request System (GPRS) to cover reimbursements, only drawing funds to cover immediate reimbursements as per OJP Financial Guide.
- Worksheets for drawing funds are sent to the Director of Finance for DPS to be deposited into the appropriate accounts within RIFANS once the funds are transferred to the State.
- The Administrative Manager prepares grant worksheets, attaches reimbursement requests and gives them to the Financial Administrative Assistant at least monthly to be processed in the state financial system for payment.
- After processing the reimbursement requests in the financial system and forwarding the documentation to the Office for Accounts and Control for actual payment, copies of the payment requests are returned to the Administrative Manager.
- The Administrative Manager updates the ledgers for each grant., documenting actual expenditures, local match, and program income, if applicable
- Quarterly, the Administrative Manager prepares the Federal Financial Reports SF-425 from the payment requests that have been processed, reporting actual funds spent, unliquidated obligations incurred at the recipient/subrecipient level both for the reporting period and cumulatively for each award, reconciling the reports to the ledgers. The summary information will include matching funds and indirect costs for the reporting period as well as program income cumulatively. The SF-425 reports will be filed through the Grant Management System (GMS) within 30 days after the last day of each quarter.

- Backup documentation for all funds drawn down are attached to the quarterly FFR and filed in the financial folder for the grant program involved.
- After filing the Federal Financial Reports the payment requests are returned to the Financial Administrative Assistant to reconcile the financial folders with the ledgers

APPENDIX A



RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY

Public Safety Grant Administration Office

One Capitol Hill, Providence, RI 02908
Telephone: (401) 222-2620 – Fax: (401) 222-1294

Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

Thomas H. Mongeau
Administration Manager
Public Safety Grant Administration Office

DISCRIMINATION COMPLAINT FORM

The purpose of this form is to assist you in filing a civil rights discrimination complaint with the RI Public Safety Grant Administration Office. The time you take to fill out this form is appreciated, as the RI Public Safety Grant Administration Office needs to know if and when unlawful discrimination is alleged against itself or one of its subgrantee agencies.

The RI Public Safety Grant Administration Office may use this form in investigating allegations of discrimination, though action by the RI Public Safety Grant Administration Office is not a substitute for legal or other remedies that may be available to you. Please be aware that time frames for filing a discrimination complaint may apply and that retention of legal counsel may be necessary to safeguard your rights. Please also know that antidiscrimination laws may contain non-retaliation provisions that are designed to protect against action taken against persons who file or participate in claims of unlawful discrimination.

You are not required to use this form and a letter containing the same information is sufficient. However, the information requested in the items marked with an asterisk (*) must be provided, regardless of whether or not this particular form is used.

1. Complainant's name and address:

Name: _____

Address: _____

_____ Zip _____

Telephone No: Home: (____) _____ Work: (____) _____

2.* Person(s) discriminated against, if different from above:

Name: _____

Address: _____ Zip _____

Telephone: Home: (____) _____ Work: (____) _____

Please explain your relationship to this person(s).

3.* Agency and department or program that discriminated:

Name: _____

DISCRIMINATION COMPLAINT FORM - CONTINUED

Any individual if known: _____

Address: _____

_____ Zip _____

Telephone No: (____) _____

4A.* Non-employment: Does your complaint concern discrimination in the delivery of services and/or other discriminatory actions by the department or agency in its treatment of you or others? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken:

____ Race/Ethnicity: _____

____ National origin: _____

____ Sex: _____

____ Religion: _____

____ Age: _____

____ Disability: _____

____ Other: _____

4B.* Employment: Does your complaint concern discrimination in employment by the department or agency? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken.

____ Race/Ethnicity: _____

____ National origin: _____

____ Sex: _____

____ Religion: _____

____ Age: _____

____ Disability: _____

____ Other: _____

5. What is the most convenient time and place for us to contact you about this complaint?

DISCRIMINATION COMPLAINT FORM - CONTINUED

6. If we will not be able to reach you directly, please give us the name and phone number of a person who can tell us how to reach you and/or provide information about your complaint:

Name: _____

Telephone No: (____) _____

7. If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name: _____

Address: _____

_____ Zip _____

Telephone No: (____) _____

8.* To the best of your recollection, on what date(s) did the alleged discrimination take place?

Earliest date of discrimination: _____

Most recent date of discrimination: _____

9.* Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently from you. (Please use additional sheets if necessary and attach a copy of written materials pertaining to your case.)

DISCRIMINATION COMPLAINT FORM - CONTINUED

10. The anti-discrimination laws we monitor for prohibit recipients of Department of Justice funds from intimidating or retaliating against anyone because he or she has either taken action or participated in action to secure rights protected by these laws. If you believe that you have been retaliated against (separate from the discrimination alleged in #9), please explain the circumstances below. Be sure to explain what actions you took which you believe were the basis for the alleged retaliation.

11. Please list below any persons (witnesses, fellow employees, supervisors, or others), if known, whom we may contact for additional information to support or clarify your complaint.

Name	Address	Area Code/Telephone
------	---------	---------------------

12. Do you have any other information that you think is relevant to our investigation of your allegations?

13. What remedy are you seeking for the alleged discrimination?

14. Have you (or the person discriminated against) filed the same or any other complaints with other offices (including the Equal Employment Opportunity Commission or the Civil Rights Division of the Rhode Island Office of Attorney General?

Yes ____ No ____

DISCRIMINATION COMPLAINT FORM - CONTINUED

If so, do you remember the Complaint Number?

Against what agency and department or program was it filed?

Address: _____

_____ Zip _____

Telephone No: (____) _____

Date of Filing: _____ Other Office: _____

Briefly, what was the complaint about?

What was the result?

15. Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any of the following?

_____ U.S. Equal Employment Opportunity Commission

_____ Federal or State Court

_____ Your State or local Human Relations/Rights Commission

_____ Grievance or complaint office

16. If you have already filed a charge or complaint with an agency indicated in #15, above, please provide the following information (attach additional pages if necessary):

Agency: _____

Date filed: _____

Case or Docket Number: _____

Date of Trial/Hearing: _____

Location of Agency/Court: _____

Name of Investigator: _____

Status of Case: _____

DISCRIMINATION COMPLAINT FORM - CONTINUED

Comments:

17. While it is not necessary for you to know about aid that the agency or institution you are filing against receives from the Federal government, if you know of any Department of Justice funds or assistance received by the program or department in which the alleged discrimination occurred, please provide that information below.

18. How did you learn that you could file this complaint? Please advise so that the RI Public Safety Grant Administration Office can better improve its strategy for responding to allegations of unlawful discrimination:

19.* We cannot proceed with a complaint if it has not been signed. Please sign and date below:

(Signature)

(Date)

Please feel free to add additional sheets to explain the present situation to us.

We would like your consent to disclose your name and personal information that you or others share with us in the event that such disclosure becomes necessary in the course of an investigation. Thus, we will need a signed *Consent Form* from you (if you are filing this complaint for a person whom you allege has been discriminated against, we will in most instances need a signed *Consent Form* from that person as well). See the "Notice on Investigatory Use of Personal Information" portion of the *Consent Form* for more information on why your consent is needed.

Please mail the completed and signed *Discrimination Complaint Form* and the signed *Consent Form* (please make one copy of each for your records) to the RI Public Safety Grant Administration Office. You may also file a complaint directly with the Office for Civil Rights, Office of Justice Programs, US Department of Justice.

**ATTN: Discrimination Complaint
Coordinator
RI Public Safety Grant Administration
One Capitol Hill, 2nd Floor
Providence, RI 02908**

**United States Department of Justice
Office of Justice Programs
Office for Civil Rights
810 Seventh Street, NW
Washington, D.C. 20531**

APPENDIX B



RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY

Public Safety Grant Administration Office

One Capitol Hill, Providence, RI 02908
Telephone: (401) 222-2620 – Fax: (401) 222-1294

Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

Thomas H. Mongeau
Administration Manager
Public Safety Grant Administration Office

Federal Civil Rights Compliance Questionnaire (CRCQ)

The Department of Justice, Office of Justice Programs, Officer for Civil Rights requires completion of the attached questionnaire intended for subrecipient agencies (subgrantees) of State Administering Agencies (SAA)s. The RI Public Safety Grant Administration Office (RIPSGAO) is the SAA in Rhode Island for many criminal justice-related grant programs.

Beginning with federal FY 2012 awards/subawards, the RIPSGAO will now require the completion of the CRC as an integral part of the acceptance of each new subgrant award. As a result, the RIPSGAO will now send this questionnaire to all subgrantee agencies accompanying new subgrant awards. However, due to the complexity of the issue, we do not expect immediate return of the signed document. Further, the document requires several narrative answers that may be lengthy. Please request an electronic copy of the MS Word form via e-mail from your RIPSGAO Grant Manager. This version will include hyperlinks (found below) to precise sections of the OCR website.

One can obtain pertinent information at the federal OCR website at

http://www.ojp.usdoj.gov/about/ocr/sample_documentation.htm

Annual Training

The new Civil Rights mandate includes a requirement for annual training on federal Civil Rights issues. The RIPSGAO has not yet created a training system for this purposes and rather, relies on the training materials located on the OCR website. Please refer to the OCR website training materials introduction at <http://www.ojp.usdoj.gov/about/ocr/assistance.htm> . Access the actual training modules at <http://www.nij.gov/ocr-training-videos/video-ocr-training.htm#videolinks> .

Deadline

The Chief Authorizing Subgrant Official must **sign the completed CRC form**; and either mail the original, or e-mail a scanned version of the signed original CRC, to the appropriate RIPSGAO Grant Manger within three (3) months of the Subaward date.

Failure to submit the completed form on time will preclude the RIPSGAO from processing subsequent grant reimbursement payments. Continued delinquency of the CRC form submission very well may result in termination of the subgrant award and jeopardize other existing and/or future subgrants.

Additional Requirements

Please note that CRC policies and procedures are still in the process of development. Should you have any questions or concerns about these new requirements, please contact RIPSGAO Administrative Manager Thomas H. Mongeau at THOMAS.MONGEAU@PSGA.DPS.RI.GOV or at 401-222-4493 for more information or clarification.



RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY
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Colonel Steven G. O'Donnell
 Commissioner, Department of Public Safety
 Superintendent, Rhode Island State Police

Thomas H. Mongeau
 Administration Manager
 Public Safety Grant Administration Office

FEDERAL CIVIL RIGHTS COMPLIANCE QUESTIONNAIRE (CRCQ)

IMPORTANT: This CRC is due three (3) months after Subgrant Award date: By:

Agency Name:		Date	
Completed By:		Title	

Grant Types: (Copy this capital "X" and paste it in all boxes that apply). Please *note that only one CRC questionnaire need be completed annually to satisfy multiple grant program subawards.*

JJDP	JAG	RSAT	PSN	Coverdell	Other:
VAWA	GTEAP	SASP	VOCA	Specify Program	Other:

In the following questions, the "Answer" text boxes will expand to fit your entire narrative.
 (Position your cursor after the word "Answer:" hit space then type your response.)

1. **How does your agency notify program participants** and beneficiaries that your agency does not discriminate based on race, color, national origin, religion, sex, disability, and age in the delivery of services?

Answer:

2. **How does your agency notify employees** that your agency does not discriminate on the basis of race, color, national origin, religion, sex, and disability in employment practices?

Answer:

3. **Does your agency have written policies or procedures in place** for notifying program beneficiaries on how to file complaints alleging discrimination by your agency with the State Administering Agency (the Authority)?

- If **yes**, please explain these policies and procedures.
- If **no**, what is the target date to have these policies in place?

Answer:

4. **Does your agency have less than 50 employees?** Copy this bold capital "X" and paste it in the correct box.

YES		NO	
-----	--	----	--

5. **Are any of the grant(s) your agency receives from the RIPSGAO over \$25,000?**

YES		NO	
-----	--	----	--

6. **Is your agency a non-profit organization?** (PLEASE NOTE: Police departments and state agencies are NOT considered non-profit organizations).

YES		NO	
-----	--	----	--

7. **Has your agency adopted grievance procedures** that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of U.S DOJ regulations *implementing Section 504 of the Rehabilitation Act of 1973, found at 28 C.F.R. Part 42, Subpart G*, which prohibits discrimination on the basis of a disability in employment practices and the delivery of services?

YES		NO	
-----	--	----	--

- If yes, when was that policy established?
- If no, what is the target date to have a procedure in place?

Answer:

8. **Has your agency designated a person to coordinate compliance** with the prohibitions against disability discrimination contained in 28 C.F.R. Part 42, Subpart G?

YES		NO	
-----	--	----	--

- If yes, please provide the contact information for that person.
- If no, what is the target date to have a person in place?

Answer:

9. **Does your agency notify participants, beneficiaries, employees, applicants, and others** that your agency does not discriminate based on disability?

YES		NO	
-----	--	----	--

- If yes, in what manner your agency notifies participants, beneficiaries, employees, applicants, and others that your agency does not discriminate on the basis of disability?
- If no, what is the target date to provide notification?

Answer:

10. **Please detail the steps that your agency has taken** to provide meaningful access to your programs and activities to persons who have **Limited English Proficiency (LEP)** and whether or not your agency has a written policy providing language access services to LEP persons.

Detail steps:

11. **Does your agency provide meaningful access to programs and activities** to persons who have Limited English Proficiency (LEP)?

YES		NO	
-----	--	----	--

- If meaningful access is provided, please explain:

Answer:

12. **Does your agency have a written policy** providing language access services to LEP persons?

YES		NO	
-----	--	----	--

- If there is no policy providing language access services to LEP persons, what is the target date for having a policy?

Answer:

13. Does your agency conduct any training for agency employees on the requirements under federal civil rights laws?

YES		NO	
-----	--	----	--

- If no, does your agency plan to create a separate training or will your agency have employees review the RIPSGAO's training materials?

Answer:

If not a Faith Based Organization, skip to Certification section.

Questions 14 -15 for Faith-Based Organization's Only

14. Does your agency conduct religious activities as a part of its program or services?

YES		NO	
-----	--	----	--

15. Does your agency provide services to anyone regardless of religious belief?

YES		NO		Not Applicable (skip a and b) to signature	
-----	--	----	--	--	--

- a. How does your agency ensure that it does not use federal funds to conduct inherently religious activities, such as prayer, religious instruction, or proselytizing, and that such activities are kept separate in time or place from federally funded activities?

Answer:

- b. How does your agency ensure that participation in religious activities is voluntary for beneficiaries of federally funded programs?

Answer:

CERTIFICATION

“I,

Name		Title	
<i>(Printed Name and Title of Authorized Subgrant Official)</i>			

do hereby certify that the above Civil Rights information is complete and accurate as the date of my signature.”

Signature		Date	
-----------	--	------	--

APPENDIX C



GENERAL SUBGRANT CONDITIONS & ASSURANCES

The Applicant agency hereby assures and certifies that it will comply with the State of Rhode Island's Purchasing Law (Chapters 37-2-1 through 37-2-76.1 of the RI General Laws), rules/regulations and general terms and conditions (listed at www.purchasing.state.ri.us).

Further, Applicant Agency (Subgrantee) hereby assures and certifies that it will comply with all regulations, policies, guidelines and requirements, including **OMB Circulars No. A-95, A-102, A-110 & FMC 74-4**, as they relate to the application, acceptance, and use of federal funds for this federally assisted project.

- 1) **Reports**—The Subgrantee shall submit, at such times and in such form as may be so prescribed, such reports as the Public Safety Grant Administration Office (PSGAO) may reasonably require, including quarterly financial reports, quarterly progress reports, final financial reports, evaluation and statistical reports, **and comprehensive annual progress reports that include quantifiable (measurable) outcomes.**
- 2) **Project Evaluation Requirements**—In order for the PSGAO to evaluate selected federally funded projects, additional information, records, reports, and data may be required of Subgrantees. In all cases, Subgrantees shall fully cooperate with the PSGAO in the performance of the evaluation. The PSGAO reserves the right to determine the need for an evaluation and prior to performing evaluations will provide written notice to the Subgrantee. The evaluation design will be jointly determined by the Subgrantee and the PSGAO.
- 3) **Project Monitoring Requirements**—Subgrantees are subject to periodic programmatic and fiscal monitoring by the PSGAO and are required to conduct an internal assessment of their own project results.
- 4) **Procurement Policy**—The specific process through which Subgrantees will procure consultant services and/or equipment is as follows: (a) \$2,500 and over: subject to prior written approval of the PSGAO, (b) less than \$2,500: must conform to state and local procurement regulations. Conformance must be documented to the PSGAO. Procurements/rental/leasing over \$250 requires documentation that three quotes were obtained. Contracts signed for equipment and services in the absence of such written approval or documentation will not be honored by the PSGAO if they are in violation of federal procurement and contract requirements. All procurement transactions, whether negotiated or competitively bid and without regard to dollar value, shall be conducted in a manner to provide maximum open and free competition.
(Please see <http://www.ojp.usdoj.gov/FinGuide/part3chap10.htm> for relevant information.)
- 5) **Maintenance of Records**—All required records should be maintained for three years after completion of a project AND after submission of the single audit report, which covers the grant period. If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues, which arise from it or until the end of the regular three-year period, whichever is later.
- 6) **a) Utilization and Payment of Funds**—Funds awarded are to be expended only for purposes and activities covered by Subgrantee's approved project plan and budget. Project funds are available through a quarterly reimbursement procedure utilizing an SF-260-R form unless other justified arrangements are made with a PSGAO Grant Manager. Payments may be adjusted to correct previous overpayments or underpayments and disallowances, *as determined by PSGAO staff.*
b) To expedite a payment, submission of an SF-260-R may be made prior to the Subgrantee actually expending funds; however, the request must be accompanied by a copy of a valid purchase order. The PSGAO processes payments on the 20th of the month only.

Initial

7) Written Approval of Changes—Subgrantees must obtain prior written approval from PSGAO for major project changes. These include: (a) changes of substance in project activities, designs, or research plans set forth in the approved application; (b) changes of the project director or key professional personnel identified in the approved application; and (c) changes in the approved project budget of *more than 10 percent*.

8) Project Income—No income may be earned by the Subgrantees with respect to funds received through the PSGAO program. Any additional funds generated by the program's existence must be accounted for and expended on program-related activities.

9) Title to Property—Title to property acquired in whole or in part with grant funds in accordance with approved budgets shall vest in the Subgrantee, subject to divestment at the option of PSGAO, where its use for the project or criminal justice purposes is discontinued. Subgrantees should exercise due caution in the use, maintenance, protection, and preservation of such property during the period of project use.

Property records must be maintained which include description, serial or identification number, source of property, name of owner, acquisition date, cost, percentage of Federal participation, location, use and condition, and disposition data. A physical inventory of the property must be taken at least once every two years.

10) Obligation of Grant Funds

a) Grant funds may not, without approval by PSGAO, be obligated prior to the effective date or subsequent to the termination date of the **subgrant** period. Obligations outstanding as of the termination date shall be liquidated within 90 days. Such obligations must be related to goods or services provided and utilized within the grant period.

b) Grant Extension - Extension of a grant project period is not automatic. Subgrantee must submit a written request with valid justification (e-mail or fax accepted) requesting a project extension a minimum of thirty (30) days prior to the grant end date. **Important NOTE!** The Victims of Crime Act program does not provide for extensions.

11) Implementation of Project within Ninety Days—Subgrantees agree to implement this project within ninety days following the grant award effective date or be subject to potential cancellation of the grant. Evidence of project implementation or valid reasons for any delay must be detailed in the first quarterly progress report.

12) Authority to Apply—The Subgrantee possesses legal authority to apply for the grant; that a resolution, motion or similar action has been duly adopted or passes as an official act of the applicant's governing body, authorizing the filing of the application; including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant (designated agent) to act in connection with the application and to provide such additional information as may be required.

13) Equal Employment Opportunity (EEO)

a) The Subgrantee will comply with Title VI of the Civil Rights Act of 1964 (P.L 88-352) and in accordance with Title VI of the Act, no person in the United States shall, on the grounds of race, color, or national origin be excluded for participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives federal financial assistance and will immediately take any measures necessary to effectuate this agreement.

b) The Subgrantee must comply with Executive Order No. 13279 and Justice Department regulations **28 C.F.R. pt. 38** (which seeks to prevent discrimination of faith-based organizations, protect the organization's autonomy while ensuring no federal funds are used to engage in inherently religious activities (i.e. praying, proselytizing, etc.). (http://www.usdoj.gov/fbci/docs/28cfr38_2.pdf)

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c) Agencies, with 50 or more employees and receive \$500,000 or more (\$1 million in an 18-month period), must submit an EEO Plan to the federal Office of Civil Rights within 60 days of award. (Please see <http://www.usdoj.gov/crt/cor/coord/titlevi.htm> for more information.)

d) The Subgrantee will comply with Title VI of the Civil Rights Act of 1964 (42 USC 2000d) prohibiting employment discrimination where (1) the primary purpose of a grant is to provide employment or (2) discriminatory employment practices will result in unequal treatment of persons who are or should be benefiting from the grant-aided activity. Further, the Subgrantee will comply, and all its contractors will comply, with the non-discrimination requirements of:

- **Omnibus Crime Control and Safe Streets Act of 1968**
(<http://www.usdoj.gov/crt/split/42usc3789d.htm>), as amended,
- **42 USC 3789(d), or Victims of Crime Act** (as appropriate)
(http://www.qp.gov.bc.ca/statreg/stat/V/96478_01.htm);
- Title VI of the Civil Rights Act of 1964, as amended;
- **Section 504 of the Rehabilitation Act of 1973**
(www.dol.gov/oasam/regs/statutes/sec504.htm), as amended;
- **Subtitle A, Title II of the Americans with Disabilities Act (ADA) (1990)**
(<http://www.usdoj.gov/crt/ada/publicat.htm>);
- **Title IX of the Education Amendments of 1972**
(<http://www.dol.gov/oasam/regs/statutes/titleix.htm>);
- **the Age Discrimination Act of 1975**
(http://www.dol.gov/oasam/regs/statutes/age_act.htm);
- Department of Justice Non-Discrimination Regulations, **28 CFR Part 42, Subparts C, D, E, and G** (http://www.access.gpo.gov/nara/cfr/waisidx_00/28cfr42_00.html) and
- Department of Justice regulations on disability discrimination, **28 CFR Part 35 and Part 39** (<http://www.ada.gov/reg2.html> and http://www.access.gpo.gov/nara/cfr/waisidx_03/28cfr39_03.html).

e) The Subgrantee agency is bound to provide immediate notification to the PSGAO of any discrimination complaints from Subgrantee employees, subcontractors or beneficiaries of Subgrantees; and/or notify the PSGAO of any findings of discrimination against the subrecipient issued by a federal or state court or federal or state administrative agency on the grounds of race, color, religion, national origin or sex.

14) Employee Relocation—The Subgrantee will comply with requirements of the provisions of the Uniform Relocation Assistance and Real Property Acquisitions Act of 1970 (P.L. 91-646) (www.fhwa.dot.gov/realstate/act.htm) which provides for fair and equitable treatment of persons displaced as a result of federal and federally-assisted programs.

15) Hatch Act—The Subgrantee will comply with the provisions of the Hatch Act which limit the political activity of employees. (Please see the web site of the U.S. Office of Special Counsel (OSC) <http://www.osc.gov/hatchact.htm> for more information.)

16) Personnel Standards

a) the Subgrantee will comply with the minimum wage and maximum hours provisions of the Federal Fair Labor Standards Act (www.dol.gov/esa/whd/flsa/), as they apply to hospital and educational institution employees of State and local governments.

b) The Subgrantee will establish safeguards to prohibit employees from using their positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business, or other ties.

c) Subgrantee agrees to complete and keep on file, as appropriate, Immigration and Naturalization Service Employment Eligibility Verification Form (I-9). This form is to be used by recipients of federal funds to verify that persons are eligible to work in the United States. (Please see US Citizenship and Immigration services web site location at <http://uscis.gov/graphics/formsfee/forms/i-9.htm> for Form I-9.)



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- 17) Audit**—The Subgrantee will give the sponsoring agency or the Comptroller General through any authorized representative the access to and the right to examine all records, books, papers, or documents related to the grant. This grant must be included in a municipality/agency's annual financial audit.

The Subgrantee will comply with all requirements imposed by the Federal sponsoring agency concerning special requirements of law, program requirements, and other administrative requirements.

The grantor agency may require certain Subgrantee agencies to submit an acceptable audited financial statement prepared by an independent auditor within six months of the end of the Subgrantee's fiscal year after which this agreement terminates. In such instances, the audit would be required to provide full and frank disclosure of all assets, liabilities, changes in fund balances, and all revenue and all expenditures. In the event an agency receives at least \$25,000 in federal financial assistance, an audit must be performed in accordance with OMB circular A-128 or OMB circular 133, as appropriate, and with "government auditing standards" as published by the Comptroller General. (See the Office of Management and Budget website at <http://www.whitehouse.gov/omb/circulars>). The audit would also be required to address areas of management efficiency; internal control will be reported in a separate management letter.

- 18) Budget Act**—This grant award, or portion thereof, is conditional upon subsequent congressional or executive action which may result from Federal budget deferral or rescission actions pursuant to the authority contained in Sections 1012(a) of the Congressional Budget and Impoundment Control Act of 1974, 31 U.S.C. 1301, P.L. 93-344, 88 Stat. 297 (July 12, 1974).

- 19) Lobbying, Debarment, Suspension, Drug-Free Workplace** — The Subgrantee should complete appropriate sections of OJP Form 4061/6 as they apply to their agency.

20) Reporting Potential Fraud, Waste, and Abuse, and Similar Misconduct

The subrecipient must promptly refer to the DOJ OIG any credible evidence that a principal, employee, agent, contractor, Subgrantee, subcontractor, or other person has either 1) submitted a false claim for federal grant funds under the False Claims Act; or 2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving federal grant funds. This condition also applies to subcontractors.

Potential fraud, waste, abuse, or misconduct should be reported to the OIG by US Mail or other courier service:

- **Office of the Inspector General**
U.S. Department of Justice, Investigations Division
950 Pennsylvania Avenue, NW, Room 4706
Washington, DC 20530
- or by e-mail: OIG.HOTLINE@USDOJ.GOV, or by hotline: (contact information in English and Spanish): (800) 869-4499, or by hotline fax: (202) 616-9881.

Additional information is available from the DOJ OIG website at www.usdoj.gov/oig.

- 21) Publications**—Subgrantee shall submit one copy of all reports and proposed publications resulting from this agreement to the PSGAO thirty (30) days prior to public release. Any publications (written, visual, or sound), whether published at the Subgrantee's or government's expense shall contain the following statement:

This project was supported by Federal Grant Number [contact your PSGAO Grant Program Administrator for the Federal Grant #] awarded by the Bureau of Justice Assistance (BJA). The Bureau of Justice Assistance is a component of the Office of Justice Programs (OJP), US Department of Justice (USDOJ) which also includes the Bureau of Justice Statistics (BJS), the National Institute of Justice (NIJ), the Office of Juvenile Justice and Delinquency Prevention (OJJDP), and the Office for Victims of Crime (OVC). Points of view or opinions in this document are those of the author and do not represent the official position or policies of the U.S. Department of Justice."

This requirement excludes press releases, newsletters, and issue analyses.)



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22) Supplantation—No funds shall be used to supplant grant program funds that would otherwise be made available for such purposes. Federal grant funds shall not be used to replace state or local funds. Grant project funds (including cash match where required) are to be used to increase the amount of funds that in the absence of federal funds, would be budgeted by the applicant agency for approved criminal justice activities or acquisitions.

23) Compliance to JJDPA Regulations—Acceptance of this grant award mandates that the Subgrantee agency/agencies, and all employees thereof, must maintain strict compliance to statutory regulations of the Juvenile Justice and Delinquency Prevention Act (JJDPA) of 1974 (as amended in 2002); Sections 223(a) (11), 223(a)(12), and 223(a)(13).

Further, subgrant agencies must submit monthly complete and accurate juvenile detention data summaries, in the format specified by the PSGAO, by the 15th of the month for the previous month. — R.I.G.L. 42-26-4 (1), 42-26-4(7), 42-26-9(6), and 42-26-11.

24) Suspension—If the Subgrantee administratively fails to comply with the terms and conditions of the award, whether stated in a state or federal statute, regulation, assurance, application, or notice of award, the PSGAO may temporarily withhold cash payments pending correction of the deficiency by the Subgrantee, and/or disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.

25) Termination of Subgrant Award - Decision for termination of subgrant funds will be initiated by the Administrative Manager of the PSGAO, with approval of the Policy Board, and will be based upon the Subgrantee's inability to perform in accordance with the general and/or specific conditions of the subgrant award, or unsatisfactory or non-filing of progress reports or any other reports or statements stipulated under the subgrant conditions.

The Administration Manager of the PSGAO will notify the highest official responsible for the subgrant award, by letter, to advise of the decision to suspend or terminate funding and said letter will cite, with specificity, the reason(s) for suspension or termination.

Reinstatement of funding can only be approved by the PSGAO Policy Board after satisfactory compliance has been made by the Subgrantee.

I have read initialed, and understand these five (5) pages of the Public Safety Grant Administration Office General Subgrant Conditions/Assurances and hereby agree to comply with all state and federal regulations enumerated herein.

Signature of Authorized Official

Date

Agency

Print Name of Authorized Official

Title

PSGAO Use Only

**Grant
Year**

**Federal Grant
Program and Number**

**Assigned
State Subgrant #**

PSGAO Grant Program Manager:

Yellow version effective September 2012 - G:\shared\Forms\Assurances\2012-2013 Assurances

APPENDIX D

Federal Civil Rights Compliance Site-Visit Checklist

Instructions

Purpose: The purpose of this checklist is to verify that the grantee is in fact implementing the policy and procedures detailed in their most current Federal Civil Rights Compliance Questionnaire (CRCQ).

Instructions: Prior to any site visit a copy of this checklist and a copy of the grantee's most recent CRCQ shall be sent to the grantee for their review with the instructions that the policy and procedure discussed in the CRCQ is going to be reviewed on their upcoming site visit.

There are two versions of this checklist. Version one is intended to be used in conjunction with the CRCQ. The Grant Specialist should, when reading the questions of this checklist either inform the grantee of their response on the CRCQ or provide them with a copy of the CRCQ. The other version allows the Grant Specialist to copy and paste the grantee's answers from the most recent CRCQ into the questions of this checklist.

Program Agency staff should be able to verify the answers to all of the questions, or make staff available to answer questions that they may not have answers to. If the Program Agency cannot make staff available to answer questions 2, 7-9 during the site visit, then a subsequent site visit shall be set up with the people at the Agency that can answer the questions.

If the grantee is required to prepare an Equal Employment Opportunity Plan (EEOP) a copy must be provided for review. When did the grantee prepare the EEOP?

Date the EEOP was approved on: _____ (date)

Questions

1) Does the sub-recipient notify program participants and beneficiaries that it does not discriminate on the basis of race, color, national origin, religion, sex, disability, and age in the delivery of services in the manner as described in Question 1 in their Civil Rights Compliance Questionnaire?

Yes No

2) Does the sub-recipient notify employees that it does not discriminate on the basis of race, color, national origin, religion, sex, and disability in employment practices in the manner as described in Question 2 in their Civil Rights Compliance Questionnaire?

Yes No

Grantee doesn't know, please contact _____

3) Does the sub-recipient have written policies or procedures in place for notifying program beneficiaries on how to file complaints alleging discrimination by the sub-recipient with the State Administering Agency (the Authority) as described in Question 3 in their Civil Rights Compliance Questionnaire?

Yes No

4) Does the sub-recipient have less than 50 employees? (If yes skip to question 10)

Yes No

5) Are any of the grant(s) received by the sub-recipient from the Authority over \$25,000? (If no skip to question 10)

Yes No

6) Is your agency a non-profit organization? (If yes, skip to question 10)

Yes No

7) Did the sub-recipient provide a copy of their grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of U.S. Department of Justice regulations implementing Section 504 of the Rehabilitation Act of 1973, found at 28 C.F.R. Part 42, Subpart G, which prohibits discrimination on the basis of a disability in employment practices and the delivery of services? (Policies are described in Question 7 of the Civil Rights Compliance Questionnaire.)

Yes No

Grantee doesn't know, please contact _____

8) Is the contact information for the disability discrimination compliance coordinator (identified in the Civil Rights Compliance Questionnaire), correct? (Contact information is listed in Question 8 of the Civil Rights Compliance Questionnaire.)

Yes No

Grantee doesn't know, please contact _____

9) Does the sub-recipient notify participants, beneficiaries, employees, applicants, and others that the sub-recipient does not discriminate on the basis of disability as described in their Civil Rights Compliance Questionnaire? (Policies are described in Question 9 of the Civil Rights Compliance Questionnaire.)

Yes No

Grantee doesn't know, please contact _____

10) Did the sub-recipient undertake the steps identified in Question 10 in the Civil Rights Compliance Questionnaire for providing meaningful access for Limited English Proficiency (LEP) persons?

Yes No

11) Does the sub-recipient have a written policy providing language access services to LEP persons?

Yes No

If yes then on what date was the policy established? _____

12) Did the sub-recipient conduct any training for agency employees on the requirements under federal civil rights laws?

Yes No

If yes, then on what dates were the trainings? _____

If no, then did they watch the Authority's webinar? Yes No

If yes, then on what dates? _____

If no, then by which date do they plan to view it? _____

13) Does the sub-recipient conduct religious activities as a part of its program or services?
(Please see question 13 of the Civil Rights Compliance Questionnaire.)

Yes No

If yes, then the follow questions must be answered.

a) Does the sub-recipient provide services to anyone regardless of religious belief? (Please see question 13(a) of the Civil Rights Compliance Questionnaire.)

Yes No

b) Does the sub-recipient ensure that it does not use federal funds to conduct inherently religious activities, such as prayer, religious instruction, or

proselytizing, and that such activities are kept separate in time or place from federally-funded activities in the method described in Question 13(b) of the Civil Rights Compliance Questionnaire?

Yes No

c) Does the sub-recipient ensure that participation in religious activities is voluntary for beneficiaries of federally-funded programs in the method described in Question 13(c) of the Civil Rights Compliance Questionnaire?

Yes No