# Grant Monitoring Standards & Guidelines

# *for*

# Hiring and Redeployment

**Office of Community Oriented Policing Services**

**U.S. Department of Justice**

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# I. Purpose of the Monitoring Standards Guide

The purpose of this Monitoring Standards Guide is to provide assistance with the monitoring, administration, and auditing of grant performance and compliance requirements. These activities help determine whether or not Community Oriented Policing Services (COPS) grantees are complying with their Hiring and Making Officer Redeployment Effective (MORE) grant terms and conditions. The eight compliance categories that interpret the terms and conditions for Hiring and MORE grants are: community policing; time savings for redeployment; retention; allowable costs; source of matching funds; supplanting; training special condition; and reporting.

This Monitoring Standards Guide provides two major functions for the Hiring and MORE grant programs. First, it provides a definition of each of the eight compliance categories, as well as the specific terms and conditions required to comply with the COPS Hiring and MORE grant programs. Second, it provides a list of performance standards and indicators, for each category, which can be used to help determine whether grantees are meeting the intent of the COPS grant programs. Also included in the beginning of this guide are a summary of the COPS grants and an explanation of the program's monitoring and auditing activities that grantees can expect upon grant award.

## II. Purpose of the COPS Grant Programs

When the Violent Crime Control and Law Enforcement Act of 1994 was signed into effect, it authorized the allocation of over $8.8 billion to rehire or hire and train additional career law enforcement officers for deployment in community oriented policing across the country. The U.S. Department of Justice (DOJ) Community Oriented Policing Services (COPS) Office is responsible for implementing the law, supporting the addition of officers and promoting community policing strategies.

The goals of the COPS Office are to provide community policing officers or sheriff's deputies to America's neighborhood streets and advance community policing nationwide. Community policing can assist in reducing levels of violence, crime, and disorder in communities.

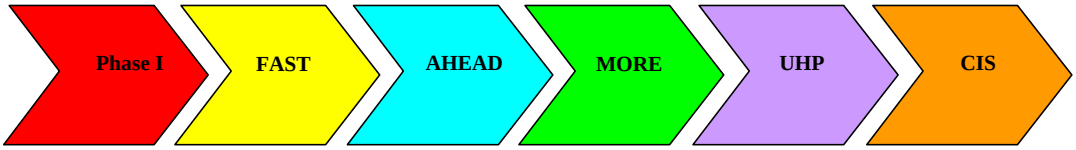
Community policing is an integral part of combating crime and improving the quality of life in the nation's cities, towns, and rural areas. This approach requires the police and citizenry to join together as partners in the course of both identifying and effectively addressing the causes and prevention of crime and disorder.

The overall intent of the grant program is to help develop an infrastructure that will institutionalize and sustain community policing after Federal funding has ended. The money awarded to the nation's law enforcement agencies is "seed" money that provides communities with enough resources to begin implementing community policing or to further advance existing community policing strategies.

# III. Types of Grants

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

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




The first of these Hiring grants, the Phase I grant, superseded the Police Hiring Supplement (PHS) grant. The PHS, administered by the Bureau of Justice Assistance, was created with the intent to increase police presence in America's communities. Limited funding prohibited the full implementation of PHS, and, consequently, only 9% of the overwhelming number of applicants were funded. With the creation of Phase I grants, $200 million was distributed in October 1994 to the remaining qualified PHS applicants to hire community policing officers.

FAST and AHEAD were the next two programs created by COPS in March and April 1995, respectively. The FAST Program provided funds to law enforcement agencies for hiring community policing officers in communities whose populations were less than 50,000. The FAST initial applications to determine eligibility were streamlined to one page and the funds awarded were expedited.

The purpose of the AHEAD Program was to provide funds to law enforcement agencies for the purpose of hiring community policing officers. The AHEAD Program provided funds to communities whose populations were 50,000 or more.

The MORE Programs provide funds to acquire civilians and new technologies. The purpose of these acquisitions is to save sworn officers' time spent on administrative and support tasks, thereby allowing them more time for community policing. Each item or position funded under the MORE Program must free up time for a sworn officer. With the extra time, the officer performs community policing activities, and/or the community

policing of the department is enhanced. It should be noted that overtime is also an allowable expense but only for the MORE ’95 grants. It is not allowable under AHEAD, FAST, UHP, or other MORE grant programs.

The UHP superseded FAST and AHEAD as the primary Hiring Program. Funds awarded under the program are to assist law enforcement agencies in hiring additional community policing officers. The population of the community is not a qualifying factor for determining initial eligibility under the UHP.

The CIS Grant Program provides an incentive for law enforcement agencies to build working relationships with schools to use community policing efforts to combat school violence.

# IV. Monitoring and Auditing Requirements

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

The purpose of monitoring is to ensure that grantees meet their programmatic and financial requirements. This will result in the achievement of the grantees' goals, and the successful implementation of the COPS Program. In general, the COPS Office monitors program activities and financial activities. Monitoring activities include on-site reviews, Office-Based Grant Reviews, COPS Count telephone-based surveys, and office-based legal, financial, and complaint reviews.

In addition to oversight, guidance and counsel provided by the COPS, grants may be subject to an audit by independent examiners. The two primary types of audits are Single Audit Act (SAA) audits and DOJ OIG audits. These audits are designed to determine whether systems are in place, controls established, and reports provide reasonable assurance that the grantee is managing funds in compliance with laws and regulations. Failure to comply with audit requirements may result in adverse current and future funding determinations.

## COPS MONITORING

The COPS Office is responsible for monitoring programmatic issues related to grant awards. Five activities may be used to monitor grant awards by COPS: 1) on-site program reviews, 2) COPS Count, 3) Office-Based Grant Reviews, 4) complaint reviews, and 5) program report reviews.

**COPS On-Site Program Reviews.** The objective of the COPS on-site reviews is to assist in ensuring that grantees meet their programmatic requirements. Using site visits as a primary vehicle, the COPS Office is committed to assuring that COPS grants are properly and effectively implemented pursuant to the authorizing statute, grant assurances and guidelines, and all applicable federal statutes and regulations.

A site visit provides the COPS Office with the knowledge and documentation of how COPS funds are being used; how compliance issues are being addressed by the grantee; and provides firsthand observation of COPS program implementation and progress. If problems are cited during a review, then the necessary documentation is gathered and the problems are referred to the appropriate COPS division for resolution.

**COPS Count.** COPS Count is a telephone survey conducted to provide an accurate accounting of hiring and redeployment of law enforcement officers funded by the COPS Office.

During the survey, COPS Hiring and MORE grant recipients are contacted by telephone and asked for information regarding the status of their grants as of a selected date. This survey information is then summarized and compared with the total number of officers funded as of the same selected date. Specific survey information includes whether officers have been hired; hire dates of officers, demographic information of the officers, and duties and responsibilities of the officers; redeployment dates and related questions for MORE grants; and grantee plans concerning future hiring and redeployment.

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

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

**Complaint Reviews.** The complaint review system provides a centralized process within the COPS Office to coordinate the follow-up on external (media, citizens, etc.) and internal reports of non-compliance. A determination is made whether the issues can be resolved through phone or letter contact, or if a site visit is warranted by COPS or OIG. The complaint review process includes a review of grantee Program Progress Reports, COPS Count data, COPS Finance/OIG site visit reports, and contact with the grant program advisor and Legal Division. Oftentimes, possible non-compliance issues can be resolved through phone contacts with grantees and receipt of documentation without on-site visits being conducted.

**Program Report Reviews.** Grant monitoring is supplemented by reviews of the grant Program Progress Reports. The COPS Office reviews progress reports submitted by grantees throughout the life of the grant. Grantees awarded Hiring grants must submit a Department Initial Report (if the grantees have never previously received a COPS Hiring grant) and a Department Annual Report. MORE grantees must submit one MORE Progress Report.

## FINANCIAL MONITORING

The COPS Office or designated representation will be responsible for monitoring financial issues related to grant awards. There are two activities that may be used to monitor grant awards: 1) on-site financial reviews and 2) office-based financial reviews.

**On-Site Financial Reviews.** On-site financial reviews are conducted at the grantee's location to assess overall financial management of a grant with a focus on providing the grantee with immediate technical assistance to correct any weaknesses identified. The on-site financial review includes a review of: (1) the grantee's accounting system and internal control over the administration of COPS grants; (2) the grantee's cash management procedures; (3) the timeliness and accuracy of Financial Status Reports submitted, and (4) the expenditures charged to the grant to determine if expenditures are allowable and supported. If any weaknesses are noted, COPS personnel, or designated representation, will provide technical assistance to individual grantees while on site to ensure weaknesses identified through financial monitoring are corrected.

Results of financial monitoring are used to refine policy guidance to grantees. Additionally, these results are used in grantee financial management training seminars to highlight the types of weaknesses most commonly identified, and to provide grantees with training on how to avoid those same common errors in their organizations. For those grantees unable to attend financial management training, additional technical assistance on financial issues can be obtained by calling the DOJ Response Center at 1-800-421-6770.

**Office-based Financial Reviews.** Grantees are required to submit financial status reports quarterly to COPS detailing grant obligations and expenditures. The office-based financial review includes an analysis of grant activity to date, financial reporting, payments under the grant, and audit reports issued on the grant. If financial problems are identified through the review process, then grantees are provided immediate technical assistance via the telephone and/or identified for a future on-site financial review.

## AUDITING

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

Typically, OIG audits encompass all Hiring and MORE grants awarded to the agency, both active and expired. OIG conducts testing to determine compliance with program, administrative, and financial requirements for each of the grants selected. Compliance areas may include, but not be limited to, supplanting, retention, allowable costs, local match, redeployment, financial and programmatic reporting, and community policing grant provisions. Once testing is completed, OIG issues a report which includes an analysis of

areas deemed to be in noncompliance and recommendations to correct problem areas. OIG's recommendations may include returning a portion, or all, of the grant funding. As such, it is imperative that the grantee remain aware of and comply with grant provisions, implement effective accounting systems, and maintain detailed, accurate records supporting grant administration.

**Independent Audits**.

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

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

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

## TERMINATION OF GRANT FUNDING

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

- substantially complying with the requirements of the Act, the guidelines or with other provisions of Federal law;
- making satisfactory progress toward the goals or strategies in the application and information as reflected by performance and status reports;
- adhering to grant agreement requirements or conditions;
- submitting reports in a timely manner;
- filing accurate certification in connection with an application, periodic report, or other documents submitted to the COPS Office or the OC; or
- submitting for prior approval to the COPS Office any significant changes that grantee anticipates being made to the application before implementing those changes.

In taking an enforcement action, COPS will provide the grantee an opportunity for a hearing, appeal, or other administrative proceeding to which the grantee is entitled under any statute or regulation applicable to the action involved.

In the event that sanctions are imposed or a grant is terminated, COPS will notify the grantee of the decision, in writing, and the reason for that decision.

# V. COPS Compliance Definitions & Conditions

The eight compliance categories that define the terms and conditions of the COPS Hiring and MORE grant programs are:

A) Community Policing
B) Time Savings for Redeployment
C) Retention
D) Allowable Costs
E) Source of Matching Funds
F) Supplanting
G) Training
H) Reporting

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

It is important to note that the Time Savings for Redeployment category pertains to the MORE Grant Program only. All other categories pertain to both the Hiring and MORE grant programs.

## A. Community Policing

**DEFINITION**

Community Policing is a philosophy that promotes and supports organizational strategies to address the causes and reduce the fear of crime and social disorder. This is achieved through problem-solving tactics and community-police partnerships. It enhances police professionalism by providing officers with the skills, technology, and motivation to act innovatively to solve community crime-related problems.

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

**CONDITIONS**

The COPS Office maintains the position that local agencies are best suited to determine their community crime-related problems and the policing activities that will solve them. Police, community members, and other public and private entities work together to address the underlying problems that contribute to crime and disorder by identifying and analyzing

problems, developing suitable responses, and assessing the effectiveness of these responses. Acceptable community policing activities are unique to each local community and must be addressed on a case-by-case basis.

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

**Community Policing Activity Approval.** The COPS Office is responsible for determining the applicability of grant awards to the community policing plan that are identified in grant applications. Community policing activities that will be executed by local law enforcement agencies are identified on grant applications and approved by the COPS Office before the grant is awarded. Grantees are not required to implement every community policing activity identified on the approved plan to demonstrate compliance. Instead, the plan may often identify a broad range of possible community policing activities, with the grantee implementing specific community policing strategies from the approved plan on an as-needed basis throughout the life of the grant.

**Changes to Community Policing Plans.** Any significant changes to the community policing plan identified in the grant application must be submitted in writing to the COPS Office. Changes are "significant" if they deviate from the range of possible community policing activities identified and approved in the grantee's original community policing plan.

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

Evidence that law enforcement agencies are incorporating a community policing policy is witnessed through three core elements: 1) police organizational elements, 2) tactical elements, and 3) external elements. **Agencies may be anywhere on the continuum of incorporating community policing into their operations; therefore, the extent to which these elements are adopted by agencies varies**.

1. Police organizational elements

   a. Philosophy adopted organization-wide. Department-wide adoption of community policing is evidenced by the integration of the philosophy into mission statements, policies and procedures, performance evaluations and hiring, promotional practices, training programs, and other systems and activities that define organizational culture and activities.

   b. Decentralized decision making and accountability. In community policing, individual line officers are given the authority to solve problems and make operational decisions concerning their roles, both individually and collectively. Leadership is required and rewarded at every level, with managers, supervisors and officers held accountable for decisions and the effects of their efforts at solving problems and reducing crime and disorder within the community.

   c. Fixed geographic accountability and generalist responsibilities. In community policing, the majority of staffing, command, deployment and tactical decision-making is geographically based. Appropriate personnel are assigned to fixed geographic areas for extended periods of time in order to foster communication and partnerships between individual officers and their community. These personnel are accountable for reducing crime and disorder within their assigned area.

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

2. Tactical elements

   a. Enforcement of laws. Community policing complements the use of proven and established enforcement strategies, becoming one of many tools available to officers that can be collectively employed to prevent and combat crime. Police departments should be active partners in identifying laws that need to be amended or enacted, and work with lawmakers and organize citizen support efforts to change them.

   b. Proactive, crime-prevention oriented. Under community policing, the focus of the police is not only on enforcement, but also emphasizes the need for crime prevention and for proactively addressing the root causes of crime and disorder. The community is actively engaged in collaborating on prevention and problem-solving activities with a goal of reducing victimization and fear of crime.

c. Problem solving. Police, community members, and other public and private entities work together to address the underlying problems that contribute to crime and disorder by identifying and analyzing problems, developing suitable responses, and assessing the effectiveness of these responses. While enforcement is an integral part of policing, problem solving relies more on preventing crime through deterring offenders, protecting likely victims, and making crime locations less conducive to problems.

3. External elements

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

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

**Career Law Enforcement Officer.** Hiring grants allow for payment of approved entry-level salaries and benefits for the hiring or rehiring of additional sworn career law enforcement officer positions for deployment in community policing activities. A "sworn career law enforcement officer" is a person hired on a permanent basis who is authorized by law, by a State or local public agency, to engage in or oversee the prevention, detection, or investigation of violations of criminal laws.

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

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

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

**MORE Grants Support Community Policing.** Community policing activities that are supported by MORE grants adhere to the same criteria as the Hiring grants; however, funding indirectly relates to community policing activities. Sworn officers are redeployed to enhance community policing activities as a result of time savings achieved through the use of technology, equipment, overtime, or civilian support services that are funded by MORE grants.

**Examples - Can be Funded for Community Policing Activities**
**(Note: This list is NOT inclusive of all community policing activities.)**

- Crime Prevention Efforts

  Examples: Youth programs; anti-drug programs; regular meetings with community groups to discuss crime; and anti-violence programs.

- Problem-Solving Activities

  Examples: Identifying crime problems with members of the community and other government agencies (e.g., probation office, prosecutor and courts); identifying crime problems by looking at crime trends; identifying top problems by analyzing repeat calls for service; preventing crime by focusing on conditions that lead to crime (e.g., abandoned buildings and cars); and building on information systems to enhance crime analysis capabilities.

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

- Community Partnerships

  Examples: Regularly surveying community members to assist in identifying and prioritizing crime problems; locating an office or stations within neighborhoods; providing community policing training to citizens; meeting with community members to learn more about the nature of specific problems; and involving community members in selecting responses to problems and determining measures of success.

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

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

- Other Agency Partnerships

  Examples: Juvenile justice services; probative, social services; parole; city and county departments; trash removal; school system; elected officials; and other public service providers.

- Patrol

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

## B. Time Savings for Redeployment

### DEFINITION

Time Savings for Redeployment applies only to the MORE Grant Program. The COPS MORE Program goal is to reduce the amount of paperwork and administrative tasks performed by veteran sworn trained officers so that they can spend more time on the street and in America's neighborhoods. Grants awarded under MORE are restricted to the purchase of technology, equipment, overtime for officers (MORE ’95 only), and the hiring of civilian support resources that will redeploy officers, or full-time equivalents (FTEs), and enhance community policing activities within the agency's jurisdiction.

The time saved through MORE-funded technology, equipment, overtime, and civilians must result in an increase in the number of officer FTEs redeployed. Redeployment of officer FTEs applies to sworn officers currently employed by the grantee who will be able to enhance community policing activities as a direct result of the purchase of the technology, equipment, overtime, or support services. Award of a MORE grant requires that the number of officers redeployed will be equal to or greater than the number of officers that would result from a COPS grant for hiring officers. Some MORE grantees with overtime and civilian hire grants received renewals for an additional 12 or 24 months and were required to demonstrate continued, but not additional, time savings or redeployment of officers with the new funds.

### CONDITIONS

To meet the redeployment grant condition, applicants must ensure that the Time Savings for Redeployment that results from COPS MORE funding enhances community policing activities. Agencies must track time savings and the redeployment of time savings into the community policing program after full implementation to assure COPS that, as a result of the grant award, community policing is being enhanced; however, there is no requirement to track every hour of time saved to an hour of community policing.

The Time Savings for Redeployment condition results from: 1) technology or equipment; 2) overtime; and 3) civilians. Technology or equipment time savings is the amount of officer's time that the equipment or technology frees up by its use. Overtime time savings results from paying currently employed sworn officers additional monies for working

additional hours beyond the normal workweek to engage in community policing activities. Civilian time saving is the amount of time an officer was assigned to a job that is now being done by a civilian who replaced the officer.

The level of Time Savings for Redeployment of FTEs that is indicated in the application is a condition of awarding the funds. The FTE requirement is located on the award document that was signed by the Director of the COPS Office and accepted by the grantee's law enforcement executive. The COPS Office standard for a full-time-equivalent sworn officer equals 1,824 hours. The COPS Office recognizes that, due to differences in shift hours, there may be slight variances in the number of officers redeployed between a grantee and the COPS Office standard formula for calculating redeployment.

**Evidence of Time Savings.** Agencies granted an award under the MORE Program are required to plan and track Time Savings for Redeployment realized from the equipment, technology, overtime (only for MORE ’95 recipients), and civilians awarded (MORE 2000-funded civilian support resources only). Once the technology or equipment funded by the grant is implemented and fully operational, as determined by the law enforcement agency, the grantees must complete a time savings tracking plan. This tracking plan describes the grantee’s methodology for measuring the time savings for each item, system or group of like items requested as identified by the grantee.

Actual tracking, pursuant to the plan, will begin after such single stand-alone, independent element, function, or operation in a geographic area is fully implemented as contained in the plan. Tracking must continue for at least one full year from the date that the technology or equipment is implemented and declared fully operational. This time is necessary for the agency to achieve the total time savings benefit identified.

The same tracking plan and actual tracking requirements, discussed above, apply to civilian awards under MORE. Tracking should begin for the civilian time savings and redeployment when civilian personnel, of each varying title/type, realize maximum time savings. Tracking must continue for at least one full year from the date that the civilians were declared fully operational by the grantee.

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

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

All grantees must maintain the details of worksheets, studies, or any other written evidence that was used to track time savings. The documentation must be kept at the local law enforcement agency. Grantees are required to produce time savings tracking plans and supporting tracking documentation during any monitoring or audit site visits.

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

**Elements of a Tracking Plan.** Tracking plans must include a statement explaining how time is being saved, the method used to track time savings (estimation, direct tracking sample, study, etc.), the hours to complete the activity before and after the equipment or technology is implemented, and a short description of enhanced community policing activities resulting from the time savings.

Once fully operational, and time savings has been tracked, a determination can be made about the actual total hours saved. Examples of time savings calculations are provided at the end of this section.

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

**Examples - How to Calculate Time Savings**

- An agency applied for and received four laptop computers to complete paperwork in their patrol cars. In the application, the agency estimated that using laptops to complete incident reports would reduce the time previously spent by half. After becoming fully operational, the agency performed a time study pursuant to their tracking plan.

There are currently 10 officers in the department who realize this time savings. It took each officer two hours per officer per shift to complete their paperwork before receiving COPS-funded laptops. If the agency's tracking period is quarterly and the Time Savings for Redeployment is tracked for the first quarter, the redeployment tracking is computed as follows:

10 officers x 1 hour saved each shift/officer
x 57 shifts (number of shifts worked by each officer this quarter using the COPS standard of 228 shifts per year)
= 570 hours saved in the first quarter

Although the total number of hours achieved in the first quarter has been calculated, one last step remains. To determine the total FTEs redeployed in the first quarter, the time saved (570 hours) would be divided by 1,824 hours (number of FTE hours per year). In this case, .3 FTEs should have been tracked by the agency in the first quarter using the laptops awarded under the COPS MORE grant.

Some other examples of calculating redeployment, for 1 full year of redeployment, or for 3 months of redeployment:

- One-to-one civilian redeployment equals the amount of time an officer was assigned to a job that is now being done by a civilian who replaced the officer.

  1 full year: 1 officer x 8 hours per shift x 228 shifts (COPS standard) = 1,824 hours saved
  1,824 hours/1,824 hours (the COPS standard) = 1 FTE

- Time savings may also be realized by multiple officers from a civilian hire. For instance, a department may hire a full-time civilian Community Service Officer to handle non-emergency calls. This may result in a time savings of 1.5 hours per shift for 7 officers in the department. In this case, redeployment could be calculated in the following manner:

  7 officers will save 1.5 hours per officer per shift
  x 57 shifts in a quarter (using the COPS standard 228 shifts per year)
  =599 hours / 1,824 hours (COPS standard) = .33 FTEs

**Summary redeployment tracking worksheet example.** The following summary redeployment tracking worksheet serves as a guide for reporting on time savings tracked by grantees.

| **Redeployment Tracking Worksheet** | **Equipment Item #1** | **Equipment Item #2** | **Civilian #1** | **Civilian #2** | **Overtime** |
|---|---|---|---|---|---|
| Number of Items Awarded | | | | | |
| Number of Items Operational and in Use During Redeployment Tracking Period | | | | | |
| Number of Officers Saving Time Using Item Average Time Saved Per Officer Each Shift (Hours) | | | | | |
| Number of Shifts Per Officer | | | | | |
| Total Time Savings (Hours) | | | | | |
| / 1,824 hours | | | | | |
| Total FTE's Saved to Date | | | | | |

## C. Retention

### DEFINITION

Hiring grantees must plan to retain the additional federally funded positions at the conclusion of the Hiring grant funding period.[1] MORE grantees must plan to retain the federally funded technology/equipment and/or civilians[2] and the resulting redeployment once the required level of redeployment[3] has been met. A distinction is made between planning to retain and actual retention.

Retention planning for Hiring grants must demonstrate that a sincere and legitimate attempt was made by the law enforcement agency and by the governing body to secure and provide local funding to employ the additional federally funded officer positions at the conclusion of the grant funding period. MORE grantees are required to retain the federally funded technology/equipment and/or civilians and the resulting redeployment awarded under MORE grant awards.

A retention plan must be submitted with the Hiring grant application, beginning with applications submitted after June 16, 1998. MORE 98 and 2000 grantees were required to submit a retention statement with their grant award application. For grantees that were not previously required to submit a retention plan with the grant application, the COPS Office may require evidence of retention planning efforts anytime during the Hiring grant funding period for Hiring grants or the redeployment period for MORE grants.

The COPS Office will measure successful retention as retention for one full local budget cycle following the conclusion of the Hiring grant funding period for Hiring grants or following the achievement of the required level of redeployment for MORE grants.

### CONDITIONS

Hiring grantees must plan to retain the additional federally funded positions at the conclusion of the Hiring grant funding period with non-COPS grant funding for one full local budget cycle. MORE grantees must plan to retain the federally funded technology/equipment and/or civilians and the resulting redeployment once the required level of redeployment has been met with non-COPS grant funding for one full local budget cycle. Evidence that the COPS grant retention planning condition is being met by grantees may come in two forms: 1) a written retention plan or, 2) supporting evidence of retention planning.

[1] The Phase I grant conditions did not include a retention requirement. See Appendix A for a definition of the Hiring grant funding period.
[2] MORE '95 overtime grantees are required to plan to continue the proposed overtime activities funded under COPS MORE.
[3] In this document the required level of redeployment is used generically, referring to the level of redeployment grantees must reach to be in compliance with their grant terms and conditions. See Appendix A for more information about the required level of redeployment for specific MORE grant programs.

MORE retention planning requires that the department must plan to continue funding for the civilian positions(s) which will enable the department to redeploy officers. The grantee must continue the redeployment of time saved that resulted from the funding for equipment or technology. For example, this type of retention planning may be accomplished by including technology and equipment upgrades and maintenance funding in future-year budget requests.

Throughout the grant period, all grantees must be able to provide evidence of how they are planning to retain the officer positions (under the Hiring grants) and the level of redeployment resulting from technology/equipment and/or civilians (under the MORE grants). Planning evidence consists of memoranda, minutes of meetings, budget documents, and other planning documents produced during the grant period. Grantees may be required to produce evidence of their progress in implementing their retention plans during any monitoring or audit activities. Additionally, grantees are required to answer questions in the Department Annual Reports and MORE Progress Reports regarding their plan to retain officer and/or civilian positions.

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

1. Document co-signed by Chief Law Enforcement Official (Chief/Sheriff/Director of Public Safety, etc.) and Chief Executive Officer (Mayor/City Manager/Chairman of County Commission, etc.) that identifies:

   - The proposed source of funding for the position(s).
   - Identification of the grant(s) covered by the retention plan.
   - The number of positions planned to be retained.

2. Documentation, including but not limited to: local council minutes; inter-office memoranda; local government elected officials' memoranda and future budget projections that demonstrate intent to retain the COPS-funded positions at the conclusion of the grant period. For example:

   - documents that demonstrate an intent to add the COPS positions to a request for local funding during local budget negotiations;
   - documents that demonstrate the jurisdiction’s attempts to seek additional law enforcement funding from private sources, including corporate, non-profit, and foundation donations or grants;
   - documents that demonstrate that the jurisdiction will try to obtain other non-federal funding sources (such as State grants, for example) to support the additional positions at the termination of the COPS grant.

Grantees that cannot comply with their retention plan must submit documentation to support mitigating circumstances. The COPS Office will review each situation on a case-by-case basis to determine if there is evidence of sufficient mitigating factors to excuse retention. Examples of possible acceptable mitigating circumstances are provided at the end of this section. Those agencies excused from the retention requirement may be required to wait up to one year before applying for additional COPS funding.

The COPS Office may monitor the grantee's compliance with the retention requirement for one full local budget cycle after the conclusion of the Hiring grant funding period for Hiring grants, or after the achievement of the required level of redeployment for MORE grants. Grantees must plan to retain officer positions or level of redeployment resulting from technology/equipment and/or civilians from the beginning to the end of a local budget cycle, regardless of when the grant ends during the previous local budget cycle.

Grantees that need further assistance may contact their grant program specialist at the COPS Office or the DOJ Response Center (800-421-6770).

**Examples - Retention Planning, Retention Plan, and Mitigating Circumstances**

- Evidence that retention planning efforts occurred throughout the life of the grant may include, but are not limited to:

  - Memoranda, minutes of elected official meetings or other documentation which demonstrate that the jurisdiction attempted to add the COPS positions to a request for local funding during local budget negotiations

  - Memoranda, minutes of elected official meetings or other documentation which demonstrate that the jurisdiction attempted to obtain other non-federal funding sources (such as State grants, for example) to support the additional positions at the termination of the COPS grant

- Memoranda, minutes of elected official meetings or other documentation which demonstrate that the jurisdiction attempted to seek additional law enforcement funding from private sources, including corporate, non-profit, and foundation donations or grants

- Example of a Retention Plan. <u>This must be written on agency letterhead</u>.

  This letter is to indicate that the ABC Police Department has employed three (3) officer positions under the provisions of the UHP grant, as well as employed one (1) civilian position under the COPS MORE grant. The City of ABC, along with the ABC Police Department, plans to retain these positions and fund them through the City of ABC's general fund. We will retain these four positions for at least one full local budget cycle, ending 9/30/99.

- Mitigating circumstances are those which demonstrate severe financial distress, a natural disaster, or any other factors that are deemed appropriate by the COPS Office. Mitigating circumstances may include, but are not limited to, the following situations when documented by the grantee:

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

**Impact of Failure to Retain on Active COPS Grants.** An agency which fails to retain officer positions and has not been exempted for mitigating circumstances may be in violation of the nonsupplanting requirement for an unjustified reduction in baseline officers if the grantee also has active COPS Hiring grants. For example, an unapproved failure to retain one COPS FAST officer position, which otherwise would have been retained with local funding, may result in an unapproved baseline reduction for the active UHP grant, since the retained COPS FAST officer position should have increased the UHP grant baseline by one position.

## D. Allowable Costs

**DEFINITION**

Allowable costs are those costs that are reimbursable under the COPS Program, as specified by the provisions/requirements of the grant. The provisions/requirements include: the approved budget, the financial clearance memorandum, and the OJP Financial Guide, which are included in the grant award package. The financial clearance memorandum limits the amount that may be charged for each category. However, the COPS Office reserves the ability to reprogram the grantee budget upon request. The costs should be reasonable in nature and permissible under the specific grant conditions. Allowable costs are different for Hiring grants and MORE grants.

**Hiring Grants**
For Hiring grants, allowable costs encompass the entry-level salaries, (including approved benefits and cost-of-living increases as specified on the grant application) for three years for sworn entry-level, lateral-transfer, or rehired officers. Allowable salaries and benefits must be based on the grantee's standard entry-level salary/benefit package, regardless of the experience of the individual officers hired (although grantees may pay the extra costs with local funds), in addition to any required local match. Under Phase I, FAST, AHEAD, and UHP, up to 75% of an entry-level salary, with a $75,000 limit over the three-year grant period, will be paid by award money, and local funding must pay the remaining portion of the salary. The CIS Program does not require a local match, allowing for entry-level salary and benefits with a $125,000 limit over the three-year grant period. Any costs above this amount will be paid by local funding.

**MORE Grants**
For MORE grants, allowable costs encompass the salaries, including approved benefits, for civilian hires during the life of the grant, including renewal periods if applicable. In addition, the MORE '95 Grant Program allowed for certain overtime costs of officers. Up to 75% of the salary will be reimbursed by award money, and the remaining portion of the salary must be paid by local funding. (MORE 2000 pays for 75% or a maximum of $25,000 for 1:1 redeployment). The 75% reimbursement is not based on entry-level salary and benefits, but may reflect the actual (approved) salary and benefit costs for the funded civilian positions. The COPS Office approval for funding civilian hires is based upon the cost effectiveness of replacing an officer with a support-service position. The salary of the civilian hire is factored into the cost-effective equation and approved with the application. Further, up to 75% of the costs for approved equipment and technology purchases is reimbursable under the conditions of the grant.

## CONDITIONS

Costs that are deemed allowable are different for Hiring and MORE grant awards.

**Hiring Grants**
If the award is for a Hiring grant, funding allows for hiring new, additional full-time, entry-level sworn officers or promoting a current part-time sworn officer into a newly created full-time COPS-funded position. If the grantee has received approval from the COPS Office to promote a part-time officer to the full-time COPS grant-funded position, then the grantee must replace the part-time vacant position using local funding **before** expending COPS grant funds on the new full time position. The newly hired, additional full-time, entry-level sworn officers do not have to be placed into community policing. They may work wherever the department deems acceptable, but one veteran for each new hire must be redeployed to community policing activities. Alternatively, of course, the newly hired COPS-funded officers may be deployed to fulfill the community policing functions of the grant.

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

For both full-time and part-time grant awards, it is acceptable for grantees to recruit and hire non-sworn officers with COPS grant monies as long as the individual will become a sworn officer through the standard training and swearing-in procedures required by the grantee's State or local law.

The determination of allowable costs for Hiring grants includes considering the local budget, which confirms the approved salary and benefits for the entry-level position. If the filled position is not entry level, the grant funding cannot pay for more than 75% of the portion of the salary and benefits of a position that is entry level. The approved COPS grant application will specify the recipient share of outlays for the local match.

**MORE Grants**

If the award is for a MORE grant, funding allows for the payment of support resources, including the salaries and approved benefits of civilian personnel (MORE 2000-funded civilian support resources only), and overtime (MORE '95), and technology and equipment that have been approved by the COPS Office. The allowable costs must directly contribute to time savings and thereby enhance the community policing presence through redeployment.

The different types of costs that are considered reasonable and, therefore, allowable, include the salary and approved benefits for civilian personnel who are employed for support services. MORE grants are awarded for one year only, with renewal available at the discretion of the COPS Office, subject to funding availability, for civilian hires and overtime for up to two years after the initial grant period. Depending on the COPS Office approval of renewal requests, the costs of salary and benefits for civilian support services may or may not be allowable.

For technology and equipment purchases, the term of the grant funding is one year. The grant application reflects whether the costs are timely and allowable. For COPS compliance purposes, "timely" is defined as consistent with the local government's procurement practices, and "allowable" is defined as approved costs specified on the grantee's application.

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

## EXAMPLES
## Allowable/Unallowable Costs by Program

### Hiring Grant Allowable Costs

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

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

- Salary and benefits may be paid during training if this is the grantee's standard practice for all officers. Examples of training include, but are not limited to, academy training, field training, and probationary training.

- If the grantee chooses to transfer veteran officers into community policing activities, the veteran officers do not have to begin those activities until the new hires finish the required training program for that particular grantee. (Training programs include academy, field, and probationary training.) The reason for this policy is twofold. First, if veterans were deployed to community policing while the new hires are in training or are not fully prepared to fill the vacant position, there would be a deficiency in another area of the police department. Second, the policy encourages consistency for COPS grantees by allowing departments to transfer veterans to community policing and not use new hires for the community policing program.

**MORE Grant Allowable Costs**

- MORE ’95, ’96, ’98
  a. mobile data computers/laptops
  b. crime analysis hardware/software
  c. mapping software
  d. personal computers
  e. automated aided dispatch systems
  f. automated booking system
  g. dictation systems
  h. salary and benefits to civilians that result in the redeployment of sworn officers
  i. administrative assistants
  j. record clerks
  k. booking clerks
  l. dispatchers
  m. certain overtime costs for officers (MORE ’95)
  n. certain training costs

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

The Memorandum of Estimated Funding will assist in determining the specific item that can be funded under the MORE grant award. The COPS budget memorandum will also assist grantees in determining allowable costs.

**Hiring Grant Unallowable Costs**

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

**MORE Grant Unallowable Costs**

a. direct salaries and benefits of sworn officers
b. police vehicles
c. siren vehicle equipment
d. office equipment/furniture
e. weapons and ammunition
f. cellular telephones
g. radios
h. pagers
i. uniforms
j. narcotics dogs/horses
k. bullet proof vests
l. breathalyzers
m. radar guns
n. video cameras
o. phone lines and voice mail systems
p. educational material
q. televisions/VCRs
r. all equipment and technology (MORE 2000 only)

## E. Source of Matching Funds

**DEFINITION**

The grantee is obligated to match a portion of the costs of the program, project, or activity as funded by the COPS Program. With the exception of the CIS Program (see below), grant awards may cover up to 75% of the costs over the grant period as outlined in the application submission; therefore, the grantee must contribute at least 25% unless a waiver is obtained from the COPS Office. For the CIS Program, however, a local match is not required. The CIS Program funds school resource officer salary and benefits over the three-year grant period, not to exceed $125,000 per officer. Any additional salary or benefits must be paid by State or local funds.

Any match, if necessary, must be fully paid before the end of the grant period. This criterion follows the logic that the COPS Program supplies "seed" money to various law enforcement agencies for community policing.

**CONDITIONS**

The Hiring and MORE grant awards have different compliance conditions for the local match requirement. For Hiring grant awards (AHEAD, FAST, UHP), the COPS grant will provide for up to 75% over three years with a maximum of $75,000 per officer for an entry-level salary and fringe benefits package. Grantees are responsible for at least 25% of the salary and fringe benefit package. If the position is not entry level, any portion of the salaries or fringe

benefits that are above an entry-level position must be provided by the grantee. CIS grantees are responsible for any additional costs for salaries and benefits over the maximum of $125,000 per officer.

For MORE ’95, ’96, and ’98 grant awards, the COPS grant will provide up to 75% of the allowable costs for equipment and technology and civilian support services under the grant guidelines. Under MORE 2000, the COPS grant will provide 75% of civilian support services salaries up to $25,000 for 1:1 redeployment. Grantees are responsible for contributing at least 25% of the remaining costs. For civilian hires, the COPS grant will provide up to 75% of the salaries and approved benefits packages. The 75% reimbursement is not based upon entry-level salary and benefits, but is based, instead, on the cost effectiveness of replacing or redeploying an officer for a support-service position. The salary of the civilian hire is factored into the cost-effective equation, which is approved with the application.

MORE grants are typically awarded for one-year periods unless grantees choose to apply for a renewal of grant funding for the civilian hires and overtime only. Approval of MORE grant renewals is at the discretion of the COPS Office and is subject to the availability of funds. Subject to the availability of funding and progress in implementing the original award, the cost of a civilian hire’s salary and benefits package or overtime costs may be renewed for up to two years after the original grant period ends, for a total of three years. These renewals of funds continue the same level of redeployment for additional years.

There are several guidelines that must be observed by grantees when meeting the source of matching funds requirement, regardless of the type of grant awarded. One of these guidelines concerns the local contribution level of matching throughout the life of the grant. For MORE grants, the grantee is responsible for at least 25% of the total cost of allowable items. For Hiring grants (with the exception of CIS), the local share must be at least 25% of the total cost of salaries and fringe benefits over the three-year period. (CIS does not require a local match, paying $125,000 over three years for school resource officer entry-level salaries and benefits. Grantees whose costs exceed the $125,000 offered under CIS to pay the excess costs with local funds). For Hiring grants (excluding CIS) the percentage of total officers’ salaries and benefits paid with Federal funds must be less in year two than in year one and less in year three than in year two. For example, if the award amount were $75,000, the grantee could spend $50,000 in Federal money the first year. The following year the grantee could spend $15,000; the third year only $10,000 of the Federal funds could be spent. While the Federal share decreases each year, all that is spent over the three-year period is a maximum of $75,000.

An additional guideline to follow concerns the type and source of the match. The type of match must be a cash match and the source of funds may not be Federal unless a Federal agency has specifically approved the use of its funds as a cash match to another federal grant program. The local match funds must be in addition to funds previously budgeted for law enforcement purposes and may not have come from other COPS grants or supplements.

Further, grantees may not count equipment costs outside of the programmatically approved project towards the local match. For example, if a MORE project costs $100,000 total for computer, software, and installation, the applicant must pay $25,000 towards the total project for the local match. The local jurisdiction may not substitute non-project expenditures, such as training officers on the use of equipment, toward the match.

If grantees include the source of the local match in the current year's operating budget, it must be intentionally budgeted in anticipation of the grant award or previously budgeted as reserve or discretionary monies, in addition to funds previously budgeted for law enforcement purposes. If the supporting documentation clearly indicates either of these conditions exists, the grantee may use those funds as an acceptable source for the local cash match. If the documentation cannot support a causal link between the budgeted funds and the anticipation of the grant award, or if the funds are not in addition to funds previously budgeted for law enforcement purposes, there is a violation of the matching funds requirement.

To demonstrate compliance with the local match requirement, grantees must be able to document the source of local match (cash match from a source of funding not previously budgeted for law enforcement); the timing of the local match (when paid); and the amount of the local match.

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

**Examples - Acceptable Sources of Matching Funds:**

- New Local Appropriations
- State Funds: it is permissible to use State funds only if allowable by State law.
- Other Federal Funds: it is permissible to use Federal funds only if allowable by the other particular Federal funding agency (e.g., Bureau of Indian Affairs).
- Other Grant Funds: it is permissible to use other grant funds if the grant is a non-COPS-related grant and only if allowable by the particular grant.
- Asset Forfeiture Fund Equitable Sharing Program
- Reserved, Discretionary, and Other Undesignated Law Enforcement Fund

## F. Supplanting

### DEFINITION

For the purpose of COPS grants, supplanting means using COPS grant funds to replace State or local funds which otherwise would have been spent on the specific law enforcement purpose of the COPS grant awards. To be in compliance with the non-supplanting requirement, COPS grant funds are to be used to supplement the budget of the law enforcement agency, not replace any currently, historically, or future appropriated funds for the grant purposes. For example, COPS Hiring grant funds may not replace State or local funding for hiring sworn officers and COPS MORE funds may not replace State or local funding for purchasing equipment or technology or for hiring civilians that would have been budgeted in the absence of receiving COPS grant funding.

The non-supplanting requirement of the COPS statute reads as follows:

> Funds made available under [the COPS statute] to States or units of local government shall not be used to supplant State or local funds, or, in the case of Indian tribal governments, funds supplied by the Bureau of Indian Affairs, but shall be used to increase the amount of funds that would, in the absence of federal funds received under [the COPS statute], be made available from State or local sources, or in the case of Indian tribal governments, from funds supplied by the Bureau of Indian Affairs.

### CONDITIONS

Regardless of the type of grant, complying with the non-supplanting requirement entails using COPS grant funds to increase the baseline level of funding by augmenting the level of State, local, or Bureau of Indian Affairs funds that would be made available for the grant purposes in the absence of the grant. When specifically referring to Hiring grants, the increased level of funding pertains to hiring new officers. For MORE grants, the level of funding that should increase with the award of the grant applies to purchasing equipment and technology, hiring civilians, or, under the MORE ’95 program, funding overtime.

An analysis of supplanting is a two-step process. The first step is to examine the facts that occurred during the life of the grant in order to determine if a supplanting violation *might* have transpired because a reduction in local or State funding for the grant-funded purpose occurred after the grantee received funding. The second step is to review pertinent data relative to the reduction to ascertain *why* the action or decisions that impacted the reduction occurred. Examples of relevant information include both historic and current copies of the grantee’s budget, local government policies, and other documentation reflecting the reasons for the reduction in the department’s budget.

The key to determining whether a supplanting violation has occurred is to decide if the reduction of local or State funding, a fact that might "look like" supplanting, would have occurred regardless of the receipt of award money for reasons unrelated to the COPS grants. Reductions in local or State funding which might indicate possible supplanting violations occur in four primary areas:

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

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

Except for FAST and AHEAD recipients, grantees are prohibited from using COPS grant funds to pay for officers or civilians who are hired prior to the award start date of the grant. FAST and AHEAD grant recipients may not use grant funds to pay for officers hired before the approved hiring start date (FAST 2/8/95; AHEAD 10/1/94), which may differ from the date of award. Grantees are required to obtain written approval from the COPS Office to use COPS grant funding for personnel hired pre-award. To obtain such approval, the grantee must provide documentation, from the time of the pre-award hiring, that proves that the additional officers or civilians were hired in specific anticipation of receiving COPS grant funds and were not otherwise funded with State or local funds.

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

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

The same provisions for hiring also apply to the purchase of approved technology and equipment before the award date of the grant. If grantees acquired the technology and equipment that was requested on the grant application before the award date, documentation from the time of the pre-award purchase is required to prove the purchase was in anticipation of the grant funding. The examples of acceptable documentation for Hiring grants can also be used to support the relationship between the purchased items and the expected grant award for MORE grants.

**Exception to Pre-Award Hiring Prohibition: Part-time to Full-time Promotions**
A unique exception to the pre-award or pre-approval hiring date requirement is the promotion of a previously locally funded (and, therefore, usually hired pre-award) part-time officer or civilian to full-time status under the COPS grant. The grantee must also hire a new officer or new civilian with local funds to backfill the vacant part-time position. COPS Hiring grant funds may not be expended on the new full-time position until it has backfilled the part-time vacancy with a new hire using local funding.

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

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

**Delays in Filling Vacant Locally Funded Sworn Officer Positions or Civilian Positions**
The COPS guidelines state that the standard procedures used by the grantee to fill locally funded vacancies must be followed by grantees in a timely and active manner during the life of the grant. Any delay in filling locally funded vacancies must not be a direct result of receiving grant funds.

In order to determine grantees' standard procedures for filling locally funded vacancies, grantees should follow their written procedures for recruiting and hiring locally funded positions.

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

A situation independent of the grant may prevent the grantee from adhering to historical practices, such as a local hiring freeze or pending litigation, and result in a delay in filling locally funded vacancies. If grantees deviate from their standard hiring procedures, documentation should demonstrate the reasons for the deviation. If, after reviewing all pertinent documentation, there is no causal link between the delays in filling locally funded vacancies and the receipt of grant funding, then a supplanting violation has not occurred.

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

- If the grantee typically hires replacement law enforcement officers from a civil service list of certified candidates, confirmation is necessary from the grantee or a civil service official showing that the grantee followed historical practices during the grant period.
- If the grantee hires replacements to coincide with State, local, or law enforcement agency training academies, verification is necessary from the grantee or an academy official showing that the grantee followed similar practices after the grant award date.
- If the grantee experiences high turnover rates, confirmation is necessary showing that the grantee is following historical hiring procedures during the grant period.
- If the grantee is filling both COPS positions as well as locally funded positions, both should be filled at approximately the same rate. If a grantee fills COPS vacancies at an unreasonably faster rate, it must justify that its reasons for doing so are unrelated to the receipt of COPS grant funding.
- To meet the timing of school years, grantees may hire new, additional officers to fill CIS-funded vacancies prior to filling locally funded, non-school resource sworn officer vacancies, as long as the grantee is continuing to take active and timely steps to fill local sworn officer vacancies.

**Decrease in the Baseline Level of Funding**

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

To determine the baseline level, the State or local funding and number of sworn officer and civilian positions must be measured as of each grant's threshold review date. (See Appendix C for the applicable review date for each type of COPS grant.) This level should be reviewed for each fiscal year during the grant period in case any additional State or local funding had been budgeted for extra positions after the original threshold date. If the State or local baseline funding increased during the grant period, the highest documented level of State or local funding or positions for sworn officers or civilians should be used as the new baseline level.

If, during the grant period, the State or local baseline level of funding or number of positions for sworn officer and civilian positions has decreased, it must be determined if there is a causal link between the decrease and the award of grant funding. Supporting documentation is needed to justify that a decrease in baseline funding or baseline positions occurred for reasons that are unrelated to the COPS grant for adequate proof of non-supplanting compliance. Acceptable forms of supporting documentation may include, but are not limited to:

- City or county council meeting minutes
- Internal departmental budget directives
- Internal law enforcement agency documents
- Independent management studies recommending reductions
- Documentation for other local agencies outlining budget reductions

**Impact of Failure to Retain on Supplanting Analysis**

An agency which fails to retain officer positions and has not been exempted for mitigating circumstances may be in violation of the nonsupplanting requirement for an unjustified reduction in baseline officers if the grantee also has active COPS Hiring grants. For example, an unapproved failure to retain one (1) COPS FAST officer position, which otherwise would have been retained with local funding, may result in an unapproved baseline reduction for the active UHP grant, since the retained COPS FAST officer position should have increased the UHP grant baseline by one position.

If the grant award is for part-time officers or civilian support services, the baseline funding level analysis is still applicable.

To verify compliance, grantees are required to demonstrate that any reduction in local funding for sworn officers and civilians or a reduction in the number of sworn officer and civilian positions is unrelated to the receipt of COPS funds.

**Examples - Supplanting Situations**

- When COPS-funded hires are excluded, a causal link has been determined to exist between the delay of filling vacant locally funded positions and the receipt of grant funding.
- Evidence shows that the amount of non-federal funding resources devoted to the hiring or rehiring of law enforcement officers has decreased in expectation of, or as the result of, receipt of a COPS grant.

## G. Training: Special Conditioned Grantees

### DEFINITION

Training is the act, process, or method by which sworn officers and civilians learn about community policing practices and other law enforcement techniques.

### CONDITIONS

Hiring and MORE Grantees

A community policing "special condition" status was bestowed on certain Hiring and MORE grantees as determined by the COPS Office, typically law enforcement departments that were new or did not have a community policing strategy. Notification of this added grant condition was sent to the grantee with the grant award. The special condition was satisfied through sworn officer representative(s) from the police department attending two on-site community policing training seminars held by the Community Policing Consortium (a COPS-funded training organization), or participating in distance learning courses (such as video tapes, workbooks, compact discs or Internet courses) provided by the Community Policing Consortium. Travel costs for the community policing training seminars through the Community Policing Consortium were paid for by the grantee. In February 2001, the Community Policing Consortium no longer offered the courses in order to satisfy this training special condition. Accordingly, the COPS Office no longer requires that the community policing special condition be satisfied by completing training through the Community Policing Consortium. However, training is still available through the Regional Community Policing Institutes.

COPS in Schools (CIS) Grantees

All COPS in Schools awards contain an additional grant condition that requires the officers deployed into the schools as a result of the CIS grant and one designated school administrator per grant to attend COPS-sponsored School Resource Officer (SRO) Training. Notification of this added grant condition is sent to the grantee with the grant award. Departments are encouraged to attend the training in the early stages of the grant, but, in all cases, departments must complete their training during the life of the grant. Under the actual grant condition, the SRO(s) deployed to work in the schools as a result of the grant and one school administrator, representing the lead partnering agency, are required to attend this team-based training. Since this is a team-based training, it is encouraged that both the school administrator and the SRO(s) attend the training together; however, COPS recognizes the difficulty in scheduling such an event. Therefore, as long as both the SRO(s) deployed into the school and the representing school administrator attend a training session sponsored by COPS during the life of the grant, the grant recipient is in compliance with this training condition. Only the training sponsored by the COPS Office will satisfy this additional grant condition. The COPS Office Grants Administration Division reserves the right to approve all participants to ensure proper representatives attend the training, thereby satisfying the grant condition. Costs, including training, per diem, travel and lodging, up to a maximum of $1,100 will be reimbursed to the grantee by the COPS Office.

## H. Reporting

### DEFINITION

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

The type of program progress reports required depends on the type of grant award. As of December 1999, the Hiring grants require two reports: 1) Department Initial Report and 2) Department Annual Report. The MORE grants require only one MORE Progress Report.

### CONDITIONS

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

**Department Initial Report: Hiring.** The Department Initial Report is required only if the department has never previously received a COPS Hiring grant. Only one report is required per agency for the life of the grant. The exception to this is for agencies that have received both a Phase I and a (other) Hiring grant(s). If this is the case, the department is required to submit one Department Initial Report for the Phase I grant and one for the other Hiring grant(s). This report solicits information regarding pre-grant data, which serves as a baseline for measuring the grantee's future progress in community policing. Information gathered includes training curriculum, demographics of police force, and community policing activities. The Department Initial Report also collects information about a department’s actual and budgeted number of locally funded officers.

A hard copy of the Department Initial Report is sent to all Hiring grantees within 30 days of receiving an award packet if a grant is awarded for the first time. The report is due back to the COPS Office within 45 days of receipt of the award packet by the grantee.
**Department Annual Report: Hiring.** The Department Annual Report solicits information very similar to the Department Initial Report. Questions on these reports include demographics of police force, retention plans, and community policing programs and activities. In addition, the Department Annual Report collects information about a

department's actual and budgeted number of locally funded officers. This information can be compared to the information provided in a grantee's Department Initial Report to determine if the baseline level of locally funded officers has decreased over the life of the grant.

A hard copy of the Department Annual Report is mailed to all grantees awarded a Hiring grant. Department Annual Reports are mailed in December of each year, for the reporting period covering January 1 - December 31, throughout the lifetime of the grant. These reports are due in February of each year.

**COPS Count.** During the survey, COPS Hiring and a sample of MORE grant recipients are contacted by telephone and asked for information regarding the status of their grants as of a selected date. This survey information is then summarized and compared with the total number of officers funded as of the same selected date. Specific survey information includes whether officers have been hired; hire dates of officers, demographic information of the officers, and duties and responsibilities of the officers; redeployment dates and related questions for MORE grants; and grantee plans concerning future hiring and redeployment.

**Progress Report: MORE.** The MORE Progress Report requires the grantee to provide information about the enhanced levels of community policing that have resulted from the purchase of equipment and/or the hiring of civilian personnel funded under the COPS MORE Grant Program. The information requested will include documentation that demonstrates that the required level of redeployment is being maintained and monitored. As of January 1, 1999, grantees have been required to submit a redeployment tracking plan with the MORE Progress Report. The information from this report will be used to monitor each grantee's progress and to provide summary data on the characteristics and activities of the project supported with COPS MORE funding.

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

**Financial Status Reports.** The Financial Status Report, (SF-269A), is a required report for both Hiring and MORE grantees that is completed and sent to the COPS Office on a quarterly basis. This report requests information on total monies spent, the breakdown by Federal expenditure and local match, and unobligated amounts. The COPS Office monitors the financial aspects of grants and will assist in completing much of the standard information; however, the grantee must provide specific financial information.

Payments to grantees are delayed if the most current financial status report has not been submitted at the time of the payment request.
For information on how to complete an SF-269A, refer to the Helpful Hints Guide at the COPS Website, *www.usdoj.gov/cops/toolbox/general_info/financial.* For technical

assistance in financially managing and administering a grant, refer to the U.S. Department of Justice Office of Justice programs, Office of the Comptroller Financial Guide, which can be found at *www.ojp.gov/FinGuide*. Grantees may also contact the DOJ Response Center at 1-800-421-6770 for additional technical assistance.

# VI. COPS Performance Indicators

This section presents a checklist of performance indicators that can be used as a guide in determining whether or not COPS grantees are in compliance with the terms and conditions of the Hiring and MORE grant awards within each of the eight compliance categories. Performance indicators present characteristics that are used to measure the results of the COPS Program activity compared to its intended purpose and compliance requirements.

In general, written evidence that grantees are complying with grant laws and regulations is always required. Consequently, copies of **all** documentation should be kept at local law enforcement agency offices. Significant changes to grant applications must be submitted in writing to the COPS Office for prior approval. Significant changes include:

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

While interpreting the goal of any of the eight compliance categories and whether the terms and conditions of the COPS grant awards have been met, the intent of the program should be kept in mind. The overall intent of the COPS grant program is to help develop an infrastructure that will institutionalize and sustain community policing after Federal funding has ended. The ultimate goal of incorporating community policing is to improve public safety through better police work, while increasing the public's interaction and satisfaction with police services.

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

# A. Community Policing

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

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to section V, pages 10-16 for a complete definition of Community Policing.** | | |
| Hiring and MORE Grants:<br>Local law enforcement agencies use grant funds to begin or enhance their community policing effort.<br><br>Grant funds under the COPS in Schools (CIS) Grant Program are used as an incentive for law enforcement agencies to build working relationships with schools to use community policing efforts to combat school violence. | Community policing activities actually executed by the local law enforcement agency are generally the same as the activities identified in the approved grant application, or in any changes received in writing.<br><br>Under the CIS Grant Program, there are specific community policing requirements that pertain to this particular grant program. For example, as a result of this grant award, an officer must be deployed to work in and around primary and secondary schools on youth-related activities for a minimum of 75% of their time. Overall, there must be an increase in the level of community policing activities that are being performed in the schools as a result of receiving a COPS in Schools award. | Any significant changes to the community policing activities identified in the grant application must be submitted in writing to the COPS Office for approval. |
| Hiring Grants:<br>Local law enforcement agencies use grant funds to hire new officers or to redeploy veteran officers resulting in enhanced community policing activities.<br><br>MORE Grants:<br>Time savings from MORE grants result in enhanced community policing activities. | Evidence of an agency's compliance with community policing activities may include, but is not limited to, the following:<br>• Working with citizen advocacy groups, and/or meeting with community groups and businesses to address local crime problems.<br>• Participating in crime analysis.<br>• Establishing crime prevention or drug prevention programs or participating in prevention efforts.<br>• Performing bike or foot patrols.<br>• Working with other government agencies to address crime and disorder problems.<br>• Having a written strategic plan for community policing.<br>• Offering or attending training in community policing.<br>• Incorporating community policing into performance evaluations.<br>• Decentralizing decision-making authority.<br>• Assigning officers to a geographic beat to encourage community-police relations.<br>• Establishing community partnerships.<br>• Performing problem-solving activities.<br>• Responding to specific community needs.<br>• Establishing youth programs and activities.<br>• Incorporating the use of volunteers into police work. | One or more of these indicators may be evidence that the local law enforcement agencies are using awards consistent with community policing.<br><br>For more information, please see section V.A. |

## B. Time Savings for Redeployment

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

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to section V, pages 16-19 for a complete definition of Time Savings for Redeployment.** | | |
| MORE Grants:<br>Time savings resulting from MORE grant award implementation is being tracked. | Documented tracking plans developed by grantees show how time savings will be tracked for each item, system or group of like items requested. One or more of the following may be used to verify compliance:<br>• Work study plans.<br>• Studies using sampling techniques.<br>• Directly tracking hours.<br>• Acceptable cost accounting methods.<br>• Any reasonable time estimation technique. | No single tracking method can cover all situations and all jurisdictions. Each jurisdiction varies in size and each situation varies in complexity.<br><br>A time savings tracking plan should be developed as soon as possible during the grant award period and tracking must continue for at least one full year from the date technology or equipment is declared fully operational.<br><br>These plans should include a statement explaining how time is being saved, the method used to track time savings (estimation, direct tracking sample, study, etc.), the hours to complete the activity before and after equipment or technology is implemented, and a short description of enhanced community policing activities resulting from the time savings. |
| MORE Grants:<br>Time is saved as a result of equipment, technology, overtime (funded only to MORE '95 grant recipients), or civilians awarded under the MORE Program. | One or more of the following may verify compliance:<br>• Documented tracking plans maintained by grantees that support time saved as a result of MORE grant awards.<br>• Redeployment tracking documentation that supports time saved as a result of MORE grant awards submitted with MORE '98 Progress Reports. | Tracking a project's time savings is required once a single, stand alone, independent item, element, function or operation is fully implemented.<br><br>Once time savings has been tracked and a determination can be made about the actual total hours saved, a redeployment tracking worksheet summarizing results of FTEs saved should be submitted with progress reports, effective beginning January 1999.<br><br>MORE renewals require evidence of continued, but not additional, redeployment. |

## Time Savings for Redeployment, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to section V, pages 16-19 for a complete definition of Time Savings for Redeployment.** | | |
| | | |
| **Performance Standards** | **Performance Indicators** | **Comments** |
| MORE Grants:<br>As a result of time saved, grantees demonstrated enhanced community policing activities. | Documentation kept by local law enforcement agency showing that time saved as a result of equipment, technology, overtime (funded only to MORE '95 grant recipients), or civilians (MORE 2000 funded civilian support resources only) awarded, results in additional community policing activity. | Grantees are required to identify the kind of community policing activities that have been enhanced as a result of time saved under the MORE grant. |

## C. Retention

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

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to section V, pages 20-23 for a complete definition of Retention.** | | |
| Hiring Grants:<br>AHEAD, FAST, UHP, COPS in School, Distressed Neighborhood Pilot Project, and Small Community Grant Program grantees are required to plan for the retention of added officer positions with non-COPS grant funding.<br><br>MORE Grants:<br>Grantees must plan to retain the federally funded technology/equipment and/or civilians[5] and the resulting redeployment after the required level of redeployment[6] has been met. | Hiring Grants:<br>*As of June 16, 1998, a retention plan must be submitted with the grant application*<br>One or more of the following may verify compliance:<br>• Written assurance is submitted with the grant award application that State and local agencies will plan to seek local or State (or certain Federal agreements) funding to retain the COPS-funded officer position(s).<br>• Certification in the application that states grantees understand and will abide by their submitted plans.<br>• Written assurance is submitted with the Department Annual Reports that states how local agencies are planning to seek local or State (or certain Federal agreements) funding to add officer positions to their local budgets or maintain the level of redeployment after the COPS grant ends.<br>• Grantees that received awards prior to June 16, 1998 can provide other evidence of retention planning efforts upon request.<br><br>MORE Grants:<br>One or more of the following may verify compliance:<br>• Retention statement is submitted with the MORE '98 and 2000 grant award application that State and local agencies will plan to seek local or State (or certain federal agreements) funding to retain the level of redeployment after the required level of redeployment has been met.<br>• Written assurance is submitted with the MORE Progress Report that states how local agencies are planning to seek local or State (or certain federal agreements) funding to maintain the level of redeployment after the required level of redeployment has been met. | Retention planning means that grantees must enter the three-year Hiring grant program or, for MORE, the one-year grant period, with the understanding that they are required to seek local funding to add these positions to their local budgets or maintain the level of redeployment after the COPS grant ends.<br><br>Requirement to submit a retention plan with the Hiring grant application was effective June 16, 1998. The plan also includes supporting documentation.<br><br>Supporting planning evidence for Hiring grants is made up of memoranda, minutes of meetings, and other planning documents during the grant period. |

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

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

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

## Retention, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to section V, pages 20-23 for a complete definition of Retention.** | | |
| | • Grantees that received MORE grant awards prior to MORE '98 and 2000 can provide other evidence of retention planning efforts upon request | |
| Hiring Grants:<br>Retention of officer positions is maintained for one full local budget cycle after the Hiring grant funding period[7] ends.<br><br>MORE Grants:<br>Retention of the federally funded technology/ equipment and/or civilians and the resulting redeployment is maintained for one full local budget cycle after the required level of redeployment[8] has been met. | Hiring Grants:<br>Retention plan is fulfilled, if applicable, and retention maintained at least one full local budget cycle after the Hiring grant funding period ends.<br><br>MORE Grants:<br>Grantees retain the level of redeployment for one full local budget cycle after achieving the required level of redeployment. | Regardless of when, during the local budget cycle, the grant funding period ends, the grantee must retain officer positions or level of redeployment from the beginning of the next local budget cycle to the end of that local budget cycle.<br><br>Mitigating circumstances may impact the retention requirement. |

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

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

## D. Allowable Costs

**GOAL: Reimbursable costs issued under the COPS Program are reasonable in nature and permissible under the specific grant conditions. Grantees that receive waivers may receive more than 75% of officer salary or MORE project costs.**

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 23-28 for a complete explanation of Allowable Costs.** | | |
| Hiring Grants:<br>Recruited and hired agreed upon number of COPS-funded officers. | Supporting documentation verifies that positions filled since grant was awarded agree with the approved costs for hiring officers, as identified in the COPS grant award. | The grantee may recruit or hire, using COPS funding and following historic local practices, only the number of officer positions agreed upon in the approved grant award. |
| Hiring Grants:<br>Requested reimbursement for 75% of entry-level salary for an officer, including benefits, for duration of grant. The maximum amount per officer is $75,000 unless a waiver has been granted by the COPS Office. | One or more of the following may verify compliance<br>• Hiring confirmation paperwork with the offered and accepted salary, including benefits, available for review.<br>• Documented entry-level salary, including benefits, available for review.<br>• Reimbursement request agrees with 75% of department documented entry-level salary and benefits package for officers over three years. | Only 75% of an officer's entry-level salary, including benefits, may be reimbursable under the Hiring grant programs with a cap of $75,000 over three years (unless a waiver has been granted). The remaining 25%, any costs over the cap, and any costs for salaries and benefits above entry-level must be paid by local funding. Furthermore, the percentage of total officers' salaries and benefits paid with federal funds must be less in year two than in year one and less in year three than in year two. |
| CIS Grants :<br>Provides a designated portion of the salary and benefits over the three-year grant period, not to exceed $125,000. Any remainder of salary or benefits, if any, is to be paid by State or local funds. | One or more of the following may verify compliance<br>• Hiring confirmation paperwork with the offered and accepted salary, including benefits, available for review.<br>• Documented salary, including benefits, available for review. | • No waivers are offered under the CIS Program.<br>• Officer position must be a new hire, but not necessarily an entry-level position. |
| MORE Grants:<br>Requested reimbursement for civilian support services extend over the allowable period. | Copy of grant award and any approved renewals or extensions, if applicable, which verifies allowable reimbursement requests of costs. | MORE grants are awarded for one year only, with renewal available for up to two years after the initial grant period ends for civilian hires and overtime (MORE '95), at the discretion of the COPS Office, and subject to funding availability. |
| MORE Grants:<br>Requested reimbursement for authorized technology/equipment. | Copy of approved grant award, which supports technology and/or equipment requests for reimbursement. | The grantee may only request reimbursement for those items agreed upon by the COPS Office on the approved grant award. |

## Allowable Costs, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 23-28 for a complete explanation of Allowable Costs.** | | |
| Hiring Grants:<br>Officer positions funded as full-time positions are filled with officers working full-time and positions funded as part-time are filled with officers working part-time. | Supporting documentation is available detailing that COPS-funded officers are, in fact, working either full time or part time, in accordance with the grant award. | Hiring grants can be awarded for either full-time or for part-time positions. Depending on the type of grant award, the officer must work either full or part time to justify salary and benefit costs. |
| Hiring Grants:<br>If a previous part-time officer was promoted to full-time under a COPS grant, then COPS monies were only expended after the vacant position was filled using local funding. | One or more of the following may verify compliance<br>• Paperwork associated with hiring new officers confirms that a replacement part-time officer was hired with local funding.<br>• Department budget and payroll accounts verify previous part-time officer was not paid salary and approved benefits from COPS monies until the part-time replacement was hired. | The law enforcement agency is required to hire new, additional part-time officers with local funds to replace any previously employed part-time officers who were promoted to full-time status under a COPS grant. The grantee cannot use COPS monies to reimburse the salary and approved benefits costs of the promoted part-time officer until a replacement part-time officer has been hired. |
| MORE Grants:<br>Cost of purchased technology/ equipment is within parameters as stated on the approved award, or as approved by the COPS Office. | One or more of the following may verify compliance:<br>• Purchase requests and payment receipts for each item purchased available for review.<br>• Copy of approved grant award confirms reasonableness of item's cost. | If the payment of an item is to be deemed allowable, the cost must be reasonable. The approved grant award has the authorized amount available for use for the cost of an item. A comparison of the cost and the approved cost will assist in judging reasonableness.<br><br>It should be noted that it may be permissible to obtain additional items in support of the MORE grant as a result of cost savings. Please see Section V.D. for more details. |
| MORE Grants:<br>Requested reimbursement for 75% of salary, including benefits, for a civilian hire for the duration of grant. | One or more of the following may verify compliance<br>• Hiring confirmation paperwork with the offered and accepted salary, including benefits, available for review.<br>• Documented salary level, including benefits, available for review.<br>• Reimbursement request agrees with 75% of department documented salary and benefits package for civilian support services. | Only 75% of a civilian hire's salary, including benefits, may be reimbursable under the MORE grants throughout the duration of the grant. The remaining 25% must be paid by local funding (unless a waiver is granted by the COPS Office).<br><br>Fringe benefits for overtime were not an allowable cost under MORE '95 grant funding. |

## Allowable Costs, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 23-28 for a complete explanation of Allowable Costs.** | | |
| MORE Grants:<br>Time spent working on support service activities equivalent to full time or part time, measured in FTE's. | Supporting documents detailing either time spent working on support activities or attendance records is equivalent to full time or part time, measured in FTEs. | MORE civilian grants can be awarded for either full-time or for part-time positions. Depending on the type of grant award, civilian hire must work either full time or part time to justify the salary and benefit costs. |
| **Performance Standards** | **Performance Indicators** | **Comments** |
| MORE Grants:<br>If a previous part-time civilian was promoted to full-time under a COPS grant, then COPS monies were only expended after the vacant part-time position was filled using local funding. | One or more of the following may verify compliance:<br>• Paperwork associated with hiring new civilians confirms that a replacement part-time civilian was hired with local funding.<br>• Department budget and payroll accounts verify that the previous part-time civilian was not paid salary and approved benefits from COPS monies until the part-time replacement was hired. | The law enforcement agency is required to hire new, additional part-time civilians with local funds to replace any previously employed part-time civilians who were promoted to full-time status under a COPS grant. The grantee cannot use COPS monies to reimburse the salary and approved benefits costs of the promoted part-time civilian until a replacement civilian has been hired. |

## E. Source of Matching Funds

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

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 28-30 for a complete explanation of Source of Matching Funds.** | | |
| Hiring Grants:<br>The grantee matched, or intends to match, the agreed upon percentage for the agreed upon hiring costs. | One or more of the following may verify compliance:<br>• Copy of approved grant award specifies agreed upon costs and percentage of match.<br>• Copy of departmental budget confirms the intention of the grantee to pay the match, or budget confirms that match has already been paid.<br>• Copy of departmental budget or other documents reflect the source, timing, and amount of match. | The COPS grant will provide for UP TO 75% over three years with a maximum of $75,000 for an entry-level officer's salary and fringe benefits package. The grantee must cover AT LEAST 25% of the costs, unless a waiver has been granted by the COPS Office.<br><br>The CIS Grant Program will cover up to a maximum amount of $125,000 for salary and benefits. Any costs over the maximum award must be paid by local or State funding. |
| MORE Grants:<br>The grantee matched, or intends to match, the agreed upon percentage for the agreed upon costs for the hiring of civilian support services and technology and equipment purchases. | One or more of the following may verify compliance:<br>• Copy of approved grant award specifies agreed upon costs and percentage of match.<br>• Copy of departmental budget confirms the intention of the grantee to pay the match, or budget confirms that match has already been paid. | The COPS grant will provide for UP TO 75% of the costs throughout the duration of the grant, including renewal periods if applicable, civilian hire's salary and fringe benefits package. The grantee must cover AT LEAST 25% of the costs, unless a waiver has been granted by the COPS Office.<br><br>The grantee must pay AT LEAST 25% of all technology and equipment purchases (unless a waiver has been granted) while the COPS grant will contribute UP TO 75%. |
| Hiring and MORE Grants:<br>The source of the match is cash. | Payment receipts or other documentation indicates the source of the match is cash. | The source of the match must be cash according to COPS program policy. |
| Hiring and MORE Grants:<br>The source of the cash match is State, local, or approved Federal funds. | Department budget and payment receipts, or other documentation, verify source of the cash match is State, local, equitable sharing or other approved federal or non-COPS grant funds. | Source of funds is state, local, or Federal. Funds may *not* be Federal unless a tribal government has permission to use the Bureau of Indian Affairs monies or the Federal agency gives express permission to the grantee to use the funds for a match. The funds may *not* have come from other COPS grants or grant supplements. |
| Hiring and MORE Grants:<br>Source of match was not previously budgeted for other law enforcement purposes. | Department budget, general ledger, payment receipts, or other documentation verify that the source of the match has not been specifically budgeted for other law enforcement needs. | The source of the cash match must be in addition to funds previously budgeted for law enforcement purposes. |

## Source of Matching Funds, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 28-30 for a complete explanation of Source of Matching Funds.** | | |
| Hiring Grants:<br>The local contribution share increases each grant year while the Federal share decreases. | Department budget, general ledger, or other documentation verify that the federal contribution is decreasing, while the local contribution is increasing each grant year. | As a percentage of the total, the local share must increase each year during the grant period, and, conversely, the federal share must decrease. |
| Hiring and MORE Grants:<br>Cash match was paid in full before the grant period ended. | One or more of the following may verify compliance:<br>• Copy of approved award, including any approved no-cost extensions, specifies the end of the grant period.<br>• Copy of department's budget, general ledger, or other documentation verifies payment of match before the end of the grant period. Or, if applicable, a copy of a waiver verifies that the grantee is excused from the entire match or a portion of the match. | The cash match must be fully paid before the end of the grant period.<br><br>The grantee is excused from either the whole, or a portion of the, local cash match if the department has obtained a waiver. |

## F. Supplanting

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

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 31-35 for a complete explanation of Supplanting**. | | |
| Hiring Grants:<br>The COPS funding increased the baseline level of funding for sworn officers and, concurrently, the baseline level of sworn officer positions. | Copy of department and local government budget reflects no decrease in State or local funds for sworn personnel during each fiscal year of grant implementation.<br><br>Or, if the baseline level of funding for sworn officers, or the level of sworn officer positions, decreased, copies of department and local government budgets and other supporting documentation verify that the decrease occurred for reasons unrelated to receiving the grant award. | The goal of the grants is to increase the "baseline" level of State, local, or Bureau of Indian Affair funds that would have been budgeted for sworn officers in the absence of COPS funding.<br><br>If there is a decrease in the baseline funds for officers or level of officer positions during the life of the grant, grantees must show that the decrease occurred for reasons unrelated to the award of grant funding. If the decrease occurred because the grantee received COPS grant funding, a supplanting violation exists. |
| Hiring Grants:<br>Grantee followed standard procedures used to recruit and hire part-time and full-time locally funded officer vacancies in a timely and active manner during the life of the grant. | One or more of the following will verify compliance:<br>• Copy of formal written procedures confirms grantee has not delayed in filling locally funded positions.<br>• If there are no formal written procedures, review of historic hiring practices support grantee's compliance with actively trying to fill locally funded positions.<br>• Copy of civil service list and the grantee's, or civil service officer's, confirmation that historical hiring practices are being followed.<br>• Copy of State, local or law enforcement training academy schedule verifies grantee's intent to fill or actual filling of locally funded positions in conjunction with training schedules.<br>• Documented high turnover rate for department supports grantee's delay in filling vacant positions.<br>• Rate that both COPS-funded vacancies and locally funded vacancies are filled is approximately the same or the grantee evidences that this did not occur for reasons unrelated to receipt of grant funding. | The COPS guidelines state that the standard procedures used to fill locally funded officer vacancies must be followed by the grantee in a timely and active manner during the grant period. To determine if the grantee has continued its standard recruiting and hiring practice, various factors must be reviewed. Because of the unique recruiting and hiring practices of each agency, discretion is necessary. |

## Supplanting, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 31-35 for a complete explanation of Supplanting**. | | |
| | ▪ Grantee fills CIS-funded vacancies prior to filling locally funded, non-school resource officer vacancies, but continues to take active and timely steps to fill locally funded vacancies. | |
| Hiring Grants:<br>Grantee delayed in following standard procedures used to recruit and hire locally funded part-time and full-time officer vacancies in a timely and active manner after the award of grant money for reasons unrelated to the receipt of grant funding. (May not be applicable to all grantees.) | Supporting documentation verifies the delay in filling locally funded part-time and full-time officer vacancies occurred for reasons unrelated to grant funding. | The COPS guidelines state that the standard procedures used to fill locally funded vacancies must be followed by the grantee in a timely and active manner after the receipt of grant money. If there has been a delay in filling locally funded officer positions, the cause of the delay must be for reasons unrelated to the grant award. Because of the unique recruiting and hiring procedures of each agency, discretion in judgment is necessary. |
| Hiring Grants:<br>Grantee uses local funds to fill a part-time officer position left vacant when an officer was promoted to fill a full-time grant-funded position. Grant funds were not expended until the vacant position was backfilled. | All of the following are necessary to verify compliance:<br>• Copy of local budget documents indicating that the level of funding for part-time positions has at least remained the same as before the grant award.<br>• Copy of documentation demonstrating that the part-time officer was hired with local funds before grant funds were expended on the promoted full-time officer. | If a grantee chooses to promote a previously employed part-time officer to fill a full-time COPS grant position, then grantee must hire a new, additional part-time officer with local funds to backfill the resulting vacancy. The grantee may not expend COPS Hiring grant funds on the new full-time position until it has filled the part-time vacancy. |
| Hiring Grants:<br>Officers funded under the COPS grants were hired after the award of the grant. | Documentation verifies the grant officers' hire date to be after the grant award date.<br><br>Or, if officers were hired before the award date, supporting documentation confirms officers were hired with the direct anticipation of receiving a COPS grant. | COPS-funded officers are to be hired after the award date of the grant unless hired in direct anticipation of the grant.<br><br>If officers were hired before the award date of the grant, and grant money is used to pay for the costs of salaries and benefits after the award, the grantee must demonstrate that the officers were hired in anticipation of the grant award. |
| MORE Grants:<br>State or local baseline level of funding for civilians and level of civilian positions does not decrease during the life of the grant. | Copy of department or local government budget reflects no decrease in Stateor local funding for civilian personnel during each fiscal year of grant implementation. | The goal of the grants is to increase the "baseline" level of State, local, or Bureau of Indian Affair funds that would have been budgeted for civilian personnel in the absence of COPS funding. |

## Supplanting, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 31-35 for a complete explanation of Supplanting**. | | |
| | Or, if the baseline level of funding for civilians or the level of civilians positions decreased, copies of department, local government budgets, or other supporting documentation verify that the decrease occurred for reasons unrelated to the grant award. | If there is a decrease in the State or local baseline funds for civilians or level of civilian personnel during the life of the grant, grantees must show that the decrease occurred for reasons unrelated to the award of grant funding. If the decrease occurred because the grantee received grant funding, a supplanting violation exists. |
| MORE Grants:<br>Grantee followed standard procedures used to recruit and hire part-time and full-time locally funded civilian support vacancies in a timely and active manner during the life of the grant. | One or more of the following will verify compliance:<br>• Copy of formal written procedures confirms grantee has not delayed in filling locally funded positions.<br>• If there are no formal written procedures, review of historic hiring practices support grantee's compliance with filling, or actively trying to fill locally funded positions.<br>• Copy of civil service list and the grantee's, or civil service officer's, confirmation that historical hiring practices are being followed.<br>• Documented high turnover rate for department supports grantee's delay in filling vacant positions.<br>• Rate that COPS-funded vacancies and locally funded vacancies are filled is approximately the same or the grantee provides evidence that a delay in filing local vacancies occurred for reasons unrelated to receipt of grant funding. | The COPS guidelines state that the standard procedures used to fill locally funded civilian support vacancies must be followed by the grantee in a timely and active manner during the grant period. To determine if the grantee has continued its standard recruiting and hiring practice, various factors must be reviewed. Because of the unique recruiting and hiring practices of each agency, discretion is necessary. |
| MORE Grants:<br>Grantee delayed in following standard procedures used to recruit and hire locally funded part-time and full-time civilian vacancies in a timely and active manner after the award of grant money because of reasons unrelated to the receipt of grant funding. (May not be applicable to all grantees.) | Supporting documentation verifies that the delay occurred for reasons unrelated to the receipt of COPS grant funding. | The COPS guidelines state that the standard procedures used to fill locally funded vacancies must be followed by the grantee in a timely and active manner after the receipt of grant money. If there has been a delay in filling locally funded civilian positions, the delay must have occurred for reasons unrelated to the grant award. Because of the unique recruiting and hiring procedures of each agency, discretion in judgement is necessary. |

## Supplanting, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 31-35 for a complete explanation of Supplanting**. | | |
| MORE Grants:<br>Grantee funded a part-time civilian position with local monies to backfill a position that was left vacant when another part-time civilian was promoted to fill a full-time grant-funded position. Grant funds were not expended until the vacant position was backfilled. | All of the following are necessary to verify compliance:<br>• Copy of budget documents indicating that the level of funding for part-time positions has at least remained the same as before the grant award.<br>• Copy of documentation demonstrating that the part-time civilian was hired with local funds before grant funds were expended on the promoted full-time civilian. | If a grantee chooses to promote a part-time civilian to fill a full-time COPS grant position, then grantee must hire a new, additional part-time civilian with local funds to backfill the resulting vacancy. The grantee may not expend COPS Hiring grant funds on the new full-time position until it has filled the part-time vacancy. |
| MORE Grants:<br>Purchase of approved technology and equipment occurred after the award start date. | Purchase requests, payment receipts, or other documentation for each item purchased verifies purchase occurred after date of grant award.<br><br>Or, if purchase of approved technology and equipment occurred before the award date, then purchase requests, payment receipts, department budget, or other supporting documentation confirms that purchases were made with the direct anticipation of receiving a COPS grant. | COPS-funded technology and equipment items are to be purchased after the award date of the grant unless purchased in direct anticipation of the grant.<br><br>If approved technology and equipment items are purchased before the award date of the grant, and grant money is used to pay for the costs of the items after the award, it must be proved that the items were purchased in anticipation of the grant award. |
| MORE Grants:<br>Civilians performing support services under the COPS grants were hired after the award start date. | Paperwork associated with the hiring of new civilians for support services verifies the hire date to be after the award start date.<br><br>Or, if new civilians were hired before the award date, then department budget and other supporting documentation confirms that civilians were hired with the direct anticipation of receiving a COPS grant. | COPS-funded civilian hires are to be hired after the award date of the grant unless hired in direct anticipation of the grant.<br><br>If civilians were hired before the award date of the grant, and grant money is used to pay for the costs of salaries and benefits after the award, it must be proved that the civilians were hired in anticipation of the grant award. |

## G. Training: Special Conditioned Grantees

**GOAL: Sworn officers, representing a "special conditioned" local law enforcement department and school administrators, receive the required, respective COPS Office community policing training or SRO training.**

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 37 for a complete explanation of Training.** | | |
| Hiring and MORE Grants:<br>Sworn officers from a department with a "special condition" designation have attended the two mandatory COPS community policing trainings before the end of the grant period – for grants issued prior to 2001. | One of the following verified compliance:<br>• Copy of training attendance verifying that a sworn officer had fulfilled the requirement and/or documentation of on-site training.<br>• Evidence showing that the training was completed before the grant period ended. | A sworn officer must have acted as a representative for each department with a "special condition" designation. Department representative(s) must have completed two trainings to achieve compliance. |
| COPS in Schools (CIS) Grants:<br>Each COPS funded SRO and the school administrator representing the lead partnering agency must attend one COPS-sponsored SRO training session. | The following will verify compliance:<br>Evidence showing that the training was completed before the grant period ended. | CIS grantees are encouraged to meet the training requirement in the early stages of the grant period. Both the COPS funded SRO(s) and school administrator are encouraged to attend the training together |

## H. Reporting

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

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 37-39 for a complete explanation of Reporting.** | | |
| Hiring Grants:<br>Department Initial Reports are completed and submitted to the COPS Office within 45 days of receipt. | All of the following are necessary to verify compliance:<br>• Department Initial Report received by the COPS Office.<br>• Department Initial Report completed accurately.<br>• Department Initial Report submitted on time.<br>• Sworn Force Level reported by two distinct categories: 1) Budgeted, and 2) Actual. | The Department Initial Report is required only if a Hiring grant is awarded for the first time. This applies to Hiring grants only. |
| Hiring Grants:<br>Department Annual Reports are completed and submitted to the COPS Office in February of each year. | All of the following are necessary to verify compliance:<br>• Department Annual Report received by the COPS Office, even if the grant has been in effect for only a portion of the reporting period.<br>• Department Annual Report completed accurately.<br>• Department Annual Report submitted on time.<br>• Sworn Force Level reported by two distinct categories: 1) Budgeted and 2) Actual. | Department Annual Reports are required annually until grant is closed out. |
| MORE Grants:<br>MORE Progress Reports are completed and promptly submitted to the COPS Office within 45 days of receipt. | All of the following are necessary to verify compliance:<br>• MORE Progress Report received by the COPS Office, even if civilian personnel are not hired or equipment is not purchased.<br>• MORE Progress Report completed accurately.<br>• MORE Progress Report submitted on time. | Only one progress report is required for MORE grants.<br><br>As of January 1, 1999, grantees have been required to submit a redeployment tracking plan with the MORE Progress Report. |

## Reporting, continued

| Performance Standards | Performance Indicators | Comments |
|---|---|---|
| **Refer to pages 37-39 for a complete explanation of Reporting.** | | |
| Hiring Grants:<br>Officer Progress Reports – See Comments. | | Beginning in December 1999 and for future reporting periods, the Officer Progress Report has no longer been required due to incorporation of the questions into the COPS Count Surveys. |
| Hiring and MORE Grants:<br>Financial Status Reports are completed and submitted to the COPS Office within 45 days after the end of the calendar quarter. | All of the following are necessary to verify compliance:<br>• Financial Status Reports, SF-269A, received by the COPS Office.<br>• Financial Status Reports, SF-269A, completed accurately.<br>• Financial Status Reports, SF-269A, submitted on time. | |

# Appendix A: Glossary of Terms

**Allowable Costs**

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

The MORE Program provides for the salaries and approved fringe benefits for the duration of the grant period, including through the renewal period if applicable, for civilian hires who perform support and administrative services. Equipment and technology reimbursement requests are also permissible under the program as long as the purchases contribute to time savings for the officers who can then be deployed to community policing activities. Overtime costs were also allowable under the MORE '95 Program. The Memorandum of Recommended and Estimated Funding and the COPS budget memorandum specify what costs are allowable under the MORE grants.

**Authorized Official**

The authorized and/or budgetary official is the individual in a grantee's organization who has final responsibility for all programmatic and financial decisions regarding a grant award.

**Baseline Level**

The "baseline" is the level of State or local funding for sworn personnel (if a Hiring grant) or for civilians (if a MORE grant) which would exist in the absence of the COPS grant funds. To comply with the non-supplanting requirement, the grantee must use COPS grant funding to increase (supplement) the baseline at all times during the grant period. Reductions in the State or locally funded baseline must be justified by the grantee as unrelated to the receipt of COPS grant funding.

**Community Policing**

Community Policing is a policing philosophy that promotes and supports organizational strategies to address the causes, and reduce the fear, of crime and social disorder through problem-solving tactics and community-police partnership.

## COPS Office

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

## Grant Award Period

The grant award period runs from the official Award Start Date, which may be found on the Award Document, for three full years if a Hiring grant or for one full year if a MORE grant. If a grantee obtains a no-cost extension to the grant award period to provide additional time for spending grant monies during the three-year or one-year grant, the official grant award period is extended until the end date of the no-cost extension.

## Grant Number

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

The first four characters represent the fiscal year the grant was awarded (e.g., FY2001). The fifth and sixth characters represent the fund code and population (served by the agency) of the program represented (e.g., "UM" which signifies a UHP grant for an agency serving a population of less than 150,000). The next two characters will always be "WX", which represent a COPS Office identifier. If the grant is a cooperative agreement, a "K" will follow the sixth character. The last four characters represent the order in which the grant was awarded by the COPS Office (e.g., the last four digits of the first grant awarded in FY2001 would be "0001", the second grant awarded would be "0002", etc.). If the grant is a cooperative agreement, the last three digits would represent the order in which a grant was awarded, instead of four (e.g., "001", "002", etc.)

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

## Hiring Grant Funding Period

The Hiring grant funding period begins the day a COPS-funded officer position is filled and runs through the time when the specific position has been funded for 36 months through COPS funds and the grantee's local match. The COPS Office recognizes that grantees awarded multiple officer positions may fill those positions at different times and that there may be interruptions because of these positions becoming vacant. Therefore, it is possible that there is a separate Hiring grant funding period for each officer position and

that the 36 months of funding may require more than three years to complete. The COPS Office will measure successful retention as retention for one full local budget cycle following the conclusion of the Hiring grant funding period for each position.

**Lateral Transfer**

A “lateral transfer” is an additional experienced law enforcement officer that a COPS grantee newly hires *from another law enforcement agency* to fill a COPS grant position. As with all grant officers, lateral transfers must be hired by the COPS grantee *after* the official COPS grant award date or hiring authorization date if earlier (see Appendix C).

**Matching Funds**

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

**Obligation of Funds**

Obligation means a legal liability to pay determinable sums for services or goods incurred during the grant period. Federal funds are considered "obligated" when the Director of the COPS Office, or his designated official, signs the grant award document. Funds are reserved against the grant until the grantee is reimbursed for all allowable expenses incurred and reported, or until the grant expires. Local funds are considered "obligated" when the salaries and benefits have been paid or will be paid for work performed by the officer(s) during a previous pay period.

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

The COPS Office is charged with fulfilling the mandates of this law. The purposes of the law are to: substantially increase the number of law enforcement officers interacting with members of the community; provide additional and more effective training to law enforcement officers to enhance their problem-solving, service and other skills needed when interacting with members of the community; encourage the development and implementation of innovative programs to permit members of the community to assist law enforcement agencies in the prevention of crime; and encourage the development of new technologies to assist law enforcement agencies in reorienting the emphasis of their activities from reacting to crime to preventing crime.

**Redeployment**

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

**Reduction in Baseline Funding in Sworn Personnel**

If the baseline funding *decreases* during the grant period, as a result of a reduction in State or local funding, the grantee must prove that the reduction is (or was) unrelated to the receipt of COPS funding to demonstrate compliance with the non-supplanting requirement.

**Rehired Officer**

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

**Required Level of Redeployment**

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

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

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

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

**b)** ***MORE '95:*** The MORE '95 Grant Program used the term "projected/actual level of redeployment" to refer to the number of FTEs a grantee projected that they will redeploy as a result of time savings achieved through the purchase of equipment and technology or the hiring of civilians. Under the MORE '95 program, grantees are required to achieve the "Actual Level of Redeployment" to meet the conditions of the grant. This number is calculated by multiplying the number of hours that are projected to be saved by the number of officers who will realize time savings and the number of shifts each of these officers will work in a year. This is divided by the COPS standard of 1,824 hours per year for one FTE. It should be noted that grantees may use different variations of this formula to calculate their estimated time savings as long as they use the COPS 1,824 hours standard for one FTE.

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

1 hour x 30 officers x 228 shifts (COPS standard) = 6,840 hours
6,840 / 1,824 (COPS standard) = 3.8 FTEs. ("Actual Level of Redeployment")
Therefore, the grantee would reach the required level of redeployment when the equivalent of 3.8 FTEs has been redeployed.

**Supplanting**

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

**Supplemental Grant Award**

A Supplemental Grant Award is a grant award, which adds monies to, and increases the scope of, an existing grant under the same grant award number. Supplemental funds may be added to COPS AHEAD, FAST, and UHP grants. Although supplemental grant funds are added to an existing grant award number, they are not renewals of the existing grant. For all compliance purposes, supplemental grants are new grant awards with new grant start and end dates. The benefit of this is that the grantee's jurisdiction need only fill out one set of Program Progress Reports and Financial Status Reports for both the original grant award and any supplemental awards.

**Support Services**

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

**Sworn Career Law Enforcement Officer**

A sworn career law enforcement officer is an officer, hired on a permanent basis, who is authorized by law or by a State or local public agency, to engage in, or supervise, the prevention, detection or investigation of violations of criminal law.

**Threshold Review Date**

The COPS Office first measures the grantee's baseline as of a threshold review date (standard for each program), *plus* any Stateor local funding added for additional sworn officer positions after the threshold review date during the grant period. The baseline therefore may increase during the grant period if additional State or local funding is budgeted for sworn personnel (see Appendix C). Reductions in the baseline after the threshold review date may be indications of supplanting (see Chapter V.F.)

# Appendix B: Examples of Compliance/Non-Compliance Cases

## Source of Matching Funds

**EXAMPLE 1.** When audited, a police department shows that it paid its 25% local match to a COPS MORE grant with funds from the department's "equipment and technology" line item.

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

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

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

## Supplanting

**EXAMPLE 1.** The department has one open locally funded full-time position. However, this position continues to be vacant while the city continues to hire COPS-funded officers.

**Possible Supplanting Violation.** In assessing the presence of supplanting, it is expected that the grantee will continue to hire new officers at a level consistent with the recent historical practice and take positive steps to fill all vacancies resulting from attrition. These steps must be taken in addition to hiring the officers funded with the COPS grant. A grant recipient may show, however, based on particular local fiscal or other conditions, that it is not possible to take all of these steps, or that it would have taken the same action that raises a question of supplanting even if the COPS grant had not been awarded.

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

**Final Resolution.** The grantee is compliant with the non-supplanting requirements. The vacancy is a result of a citywide hiring freeze that is unrelated to the COPS grant.

**EXAMPLE 2.** Before receiving a COPS Hiring grant, a city passes a tax increase for the specific purpose of adding 10 sworn officer positions to the police department. At the time of the grant award, the department has not hired any new officers for the additional 10 positions. Upon receiving grant funding, the department hires 10 new sworn officers and pays for the additional positions with COPS grant funds. The city then reduces the taxes the following year to "return" the previously enacted tax increase to the citizens.

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

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

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

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

**EXAMPLE 3.** A department receives a MORE grant to purchase 10 mobile data terminals (MDTs). The grant award start date is October 1, 1998. When audited, the department provides copies of the purchase orders for the MDTs, which were signed on June 1, 1998. The department did not pay for the terminals until November 1, 1998, and the MDTs were not delivered to the department until December 1, 1998.

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

**Investigation and Analysis.** If the signed purchase order from June 1, 1998 represented a commitment to purchase the MDTs without regard to the availability to COPS grant funding, the date of payment and delivery is irrelevant to supplanting analysis.

The department was unable to provide any supporting documentation to link the signed purchase order of June 1, 1998 to the anticipation of the MORE grant funding. The purchase order itself did not reference the source of funding for the MDT's, and it did not contain any clause that purchase was contingent upon outside factors regarding the source of funding. The department was unable to supply any correspondence between department officials and the vendor to indicate that the MORE funds had been discussed in any way in relation to the signed purchase order. In addition, a May 1998 memorandum from the city manager's office to the department authorized the department to sign the purchase order with the understanding that the city would pay for the terminals "if the federal grant did not come through."

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

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

## Financial Reports

**EXAMPLE 1.** Records indicate that the grantee is behind in submitting financial status reports.

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

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

**Final Resolution.** The grantee is compliant with the financial reporting requirement.

**EXAMPLE 2.** Grantee claims they did not draw down funds in the amount of $13,897 on 11/13/97 as the Office of the Comptroller's records indicate.

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

**Investigation and Analysis.** Although the grantee does not have any record of the transaction, a previous draw down for the same amount was processed six months earlier, and there were two draw downs from that account, one of which was posted on 11/13/97 according the Office of the Comptroller financial transactions records and the grantee's banking institution. It appears as if the grantee's accounting records are in error and should be adjusted.

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

# Appendix C: Grant Threshold Review Dates

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

| COPS Redeployment Grants Program Name | Threshold Supplanting Review Date | Early Hire or Purchase Review Date |
|---|---|---|
| COPS MORE '95 | Application Submission Date | Award Start Date |
| COPS MORE '96 | Application Submission Date | Award Start Date |
| COPS MORE '98 | Application Submission Date | Award Start Date |
| COPS MORE 2000 | Application Submission Date | Award Start Date |

# Appendix D: Examples of Redeployment Tracking

## EXAMPLE 1: REDEPLOYMENT BY SHIFT

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

**Required Redeployment**

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

**Projected/Actual Redeployment**

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

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

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

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

The formula used to calculate the projected actual redeployment is:

1 hr. per shift X 20 officers X 228 shifts = 4,560 hrs. per yr.
4,560 hrs./1,824 hrs. (COPS standard) = 2.5 FTEs

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

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

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

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

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

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

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

**Implementing the Redeployment Tracking Plan**

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

**Group One: 20 officers prior to technology implementation**

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

**Group Two: 20 officers with mobile data computers**

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

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

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

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

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

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

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

## EXAMPLE 2: REDEPLOYMENT BY WEEK

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

**Required Redeployment**

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

**Projected/Actual Redeployment**

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

7.5 hrs. x 40 officers x 52 weeks = 15,600 hrs. per yr.
15,600 hrs. / 1,824 hrs. (COPS standard) = **8.6 FTEs**

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

**Redeployment Tracking Plan**

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

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

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

> "In order to track the time savings that officers will realize under this grant, we have issued log sheets to each officer and asked them to log in the time that is spent entering reports into the laptop and sending them to headquarters through wireless transfer. On a weekly basis, we will use a sample based on the reports of 8 of the officers to determine the average amount of time that each officer saves as a result of the implementation of the CAD/RMS and MDTs."

Finally, the department describes how the time savings they realize will enhance its community policing efforts.

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

**Implementing the Tracking Plan**

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

| **Officer** | **Sun** | **Mon** | **Tues** | **Wed** | **Thurs** | **Fri** | **Sat** | **Total** |
|---|---|---|---|---|---|---|---|---|
| Dame | 1.25 | 1.75 | | | 1.5 | 1 | 2 | 7.5 |
| Chapman | | 1.5 | 1.5 | 2 | 1 | 1.25 | | 7.25 |
| Neely | 1.5 | 1.5 | 1.25 | 1.75 | 2 | | | 8.0 |
| Mehring | | | 1.75 | 1.75 | 2 | 1.5 | 1 | 8.0 |
| Bezdikian | 1 | 1.75 | | | 1.5 | 2 | 1.5 | 7.75 |
| Clark | 2 | 1.5 | 1.25 | 1.25 | | | 1.5 | 7.5 |
| Scrivner | 1.5 | | | 1 | 2 | 1.25 | 1.25 | 7.0 |
| Gorniak | | 2 | 1.75 | 1.5 | 1.5 | 1.25 | | 8.0 |
| **Total** | **7.25** | **10.0** | **7.5** | **9.25** | **11.5** | **8.25** | **7.25** | **61.0** |

The department is able to tabulate on a weekly basis the time savings that accrues over the course of the grant. When the COPS Count Operators call at the end of the first 3 months of fully operational status, the department reports that, on average (based on the sample), officers are spending 7.6 hours per week writing reports. This is a time savings of 7.4 hours per week. They use the following formula to determine their progress after 12 weeks:

7.4 hrs. per officer x 12 weeks x 40 officers = 3,552 hrs. saved
3,552 hrs. /1,824 hrs. = 1.9 FTEs saved over 12 weeks.

If the department remains on track with this level of time savings, they will achieve a total time savings over a period of 1 year of 7.6 FTEs. Although this is slightly less time savings than they originally projected, it still exceeds the required level of redeployment for the grant.

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

2 hrs. per week x 4 officers x 52 weeks = 416 hrs.
416 hrs. / 1,824 hrs. (COPS Standard) = **.2 FTEs**

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

## EXAMPLE 3: REDEPLOYMENT BY REPORT

The Sunshine Police Department applies for a MORE grant to purchase 12 laptop computers with supporting hardware and report writing software. Currently, all officers hand-write their reports. The department has a sworn force strength of 25 officers with four patrol officers assigned to each shift. Last year, the department generated a total of 28,763 reports. Each officer currently spends about 40 minutes writing each report and averages five reports per shift. If the department receives the MORE grant, they estimate that each officer will save approximately 20 minutes per report, cutting the time it takes to complete the reports in half. The cost of the laptops with supporting hardware/software is $60,000. To determine required level of redeployment, the department uses the following formula which is laid out in the Cost Effectiveness Worksheet portion of the grant application.

**Required Redeployment**

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

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

| | |
|---|---|
| 28,763 reports per yr. x 20 min. per report | = 575,260 min. |
| 575,260 min./ 60 min. | = 9,587 hrs. saved |
| 9,587 hrs. saved / 1,824 hrs. (Cops standard) | = **5.3 FTEs** |

The department exceeds the required redeployment level and is awarded the MORE grant.
**Redeployment Tracking**
The Sunshine Police Department must now develop a plan to track redeployment once their system becomes operational. The agency begins its redeployment tracking plan with a short summary of the project and how it will save time for officers within the agency.

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

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

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

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

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

**Implementing the Redeployment Tracking Plan**
The department implements the grant and each officer submits a time log each shift showing time savings that is achieved as a result of the grant. The log sheets are then totaled for each officer and entered into a spreadsheet tracking the time savings that each officer realizes. Because tracking the time savings for 25 officers can be time consuming, the department uses a sample of 12 officers who work varying shifts to determine time

savings for the entire department. Using the log sheets, the department is able to create the following spreadsheet to determine how long it takes officers to do a report on average. A sample of the spreadsheet that they use to track the hours saved follows:

| Officer | Reports per Shift | Time spent writing reports |
|---|---|---|
| Dame | 8 | 180 minutes (3 hours) |
| Chapman | 5 | 135 minutes (2.25 hours) |
| Neely | 3 | 60 minutes (1 hour) |
| Mehring | 6 | 150 minutes (2.5 hours) |
| Bezdikian | 6 | 150 minutes (2.5 hours) |
| Clark | 2 | 30 minutes (.5 hours) |
| Scrivner | 5 | 120 minutes (2 hours) |
| Gorniak | 7 | 225 minutes (3.75 hours) |
| Dodge | 6 | 150 minutes (2.5 hours) |
| Webb | 8 | 180 minutes (3 hours) |
| Phillips | 6 | 150 minutes (2.5 hours) |
| Alford | 4 | 120 minutes (2 hours) |
| **TOTAL** | **66** | **1,650 minutes (27.5 hours)** |

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

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

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

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

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

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

## EXAMPLE 4: REDEPLOYMENT BY ARREST

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

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

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

**Projected/Actual Redeployment**

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

**Time savings per arrest**

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

136,800 arrests per year (September 1998-September 1999)
136,800 x 4 hrs. saved = 547,200 hrs. saved
547,200 hrs. saved / 1,824 hrs. = **300 FTEs redeployed**

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

**Redeployment Summary**

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

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

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

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

State capital (approximately one-fourth (¼) of all arrestee prints), an average of **30 minutes per arrest** is saved through this automated booking technology.

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

With the implementation of Live Scan, along with the other components of the system, an offender is printed and photographed automatically, data is entered directly into the booking system from the precinct (paperless reporting), and the arrest affidavit is completed via video-teleconferencing. Redeployment occurs by eliminating the need to perform routine multiple prints, waiting time for receiving confirmation from the State capital, in reprinting rejected prints, taking manual photographs, and most importantly, by reducing travel time to and from the precinct to the central booking facility and the District Attorney's Office. In sum, the new technology has permitted the Gotham City Police Department to save police officer arrest processing time citywide.

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

**Time savings per arrest**

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

136,800 arrests per year (September 1998-September 1999)
136,800 x 4 hrs. saved = 547,200 hrs. saved
547,200 hrs. saved / 1,824 hrs. = **300 FTEs redeployed**
**300 FTEs redeployed into community policing since the equipment became fully operational in September 1998**

**Unanticipated Time Savings**
Because both mug shots and fingerprints are now stored electronically in a centralized citywide database, detectives who formerly used to scour through paper files for hours on end can now search the fingerprint and mug shot archives during the investigative process. Based on a survey of the detectives conducted in the detective bureau, detectives are now saving an average of 1 hour per search.

**Time savings of 1 hour per search**

1 hour per either fingerprint or mug shot search x 300,000 searches per year citywide (September 1998-September 1999) = 300,000 hrs. saved
300,000 hrs. saved / 1,824 hrs.
= **164.5 FTEs of unanticipated time savings for detectives**

**TOTAL FTEs Redeployed: 300 + 164.5 = 464.5**

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

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

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

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

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

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

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

## EXAMPLE 5: TASK-ORIENTED CIVILIAN REDEPLOYMENT

The Wickersville Police Department applies for a MORE grant to hire 4 civilian Police Aides to assist with answering non-emergency calls for service. Currently, the department estimates that each officer spends about 3 hours per shift answering non-emergency calls for service. The department has a sworn force strength of 34 officers with 6 patrol officers assigned to each shift. If the department receives the MORE grant, they estimate that each officer will save approximately 1.5 hours per shift as a result of the civilian hires. The cost of hiring these 4 civilians is $100,000 including salary and benefits. To determine their required level of redeployment, the department would use the following formula that was laid out in the Cost Effectiveness Worksheet portion of the grant application.

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

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

1.5 hrs. per officer per shift x 34 officers x 228 shifts = 11,628 hrs. saved
11,628 / 1,824 hrs = **6.4 FTEs**

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

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

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

Next, the department explains the method they plan to use to track the time savings resulting from the hiring of the civilian police aides.

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

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

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

**Implementing the Redeployment Tracking Plan**
The department implements the grant, and each officer submits a time log each shift showing time savings that is achieved as a result of the grant. The log sheets are then totaled for each officer and entered into a spreadsheet tracking the time savings that each officer realizes. Once the civilians are hired, the department finds that only 24 officers will

benefit from them because they will not be working the 3rd shift. Because tracking the time savings for 24 officers is very time consuming, the department uses a sample of 10 officers who work varying shifts to determine time savings across the department. Using the log sheets, the department is able to create the following spreadsheet to determine how long it takes officers to do a report on average. A sample of the spreadsheet that they use to track the hours saved follows:

| **Officer** | **# of non-emergency calls** | **Hours spent on non-emergency calls** |
|---|---|---|
| Hoff | 3 | 2 |
| Townsend | 1 | 1 |
| Varano | 2 | 1.5 |
| Smith | 2 | 2.5 |
| Curtis | 3 | 3 |
| Morgan | 1 | 1 |
| Shay | 4 | 3 |
| Tucker | 3 | 2 |
| Mehring | 2 | 1.5 |
| Phillips | 3 | 2.5 |
| **Total** | **24** | **20** |

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

1 hr. x 24 Officers x 57 shifts (1/4 of 228) = 1,368 hrs. saved
1,368 hrs. / 1,824 hrs. (COPS standard) = **.8 FTEs**

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

# Appendix E: Reference Material

**U.S. Department of Justice Grant Policies**

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

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

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

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

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

**Statutes**

**Public Safety Partnership and Community Policing Act of 1994;**
**42 USC §3796dd-1 (c)**

**Administrative Requirements:**

**OMB Circular A-129, "Managing Federal Credit Programs"**

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

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

**Cost Principles:**

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

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

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

**Audit Requirements:**

**OMB Circular A-133, "Audits of States, Local Governments and Nonprofit Institutions"**

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

**Code of Federal Regulations**

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

**5 CFR Part 1320, "Controlling the Paperwork Burden on the Public"**

**5 CFR Part 151, "Political Activities of State and Local Officials or Employees"**

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

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

**28 CFR Part 66, "Uniform Administrative Requirements for Grants and Cooperative Agreements with State and Local Units of Government"**

**28 CFR Part 67, "Governmentwide Requirements for Drug-Free Workplaces (Grants)"**

**28 CFR Part 69, "Governmentwide New Restrictions on Lobbying"**

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

**Executive Order 1254 , "Non-Procurement Debarments and Suspension"**

**Executive Order 12372, 28 CFR Part 30, "Intergovernmental Review of Federal Programs"**

**Executive Order 1229,1 "Regulations"**