

**Edward Byrne Memorial Justice Assistance Grant (JAG) Program**

**ACCEPTANCE OF FEDERAL FUNDING ASSISTANCE**

Subrecipient: Pinellas County Board of Commissioners

Subgrant Number: 2020-JAGC-PINE-14-5R-090

Project Title: SEXUAL PREDATOR AND OFFENDER TRACKING (SPOT) UNIT DEPUTY

Pass-through Entity: Florida Department of Law Enforcement

This award is subject to all applicable rules, regulations, and conditions, as contained in the Department of Justice Grants Financial Guide, and the Office of Management and Budget Uniform Grant Requirements (2 C.F.R. Part 200). This award is also subject to the incorporated standard and special conditions, and such further rules, regulations, and policies as may be reasonably prescribed by the State or Federal Government.

In witness whereof, the parties affirm they each have read and understand the conditions set forth in this agreement, have read and understand the agreement in its entirety, and accept this agreement through the signature of their duly authorized officers on the date, month, and year set out below.

Pinellas County Board of Commissioners  
Authorizing Official (Commission Chairperson, Mayor, or Designated Representative)



December 8, 2020

Signature

Date

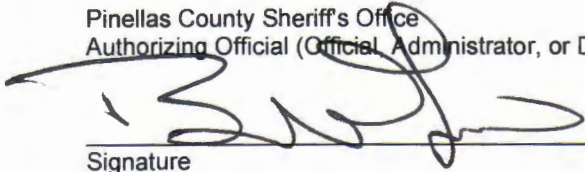
Barry Burton, Pinellas County Administrator

Printed Name and Title

**APPROVED AS TO FORM**

By: Matthew Tolnay  
Office of the County Attorney

Pinellas County Sheriff's Office  
Authorizing Official (Official Administrator, or Designated Representative)



10/14/20

Signature

Date

**Bob Gualtieri, Sheriff**

Printed Name and Title

Florida Department of Law Enforcement  
Office of Criminal Justice Grants

Signature

Date

Printed Name and Title

**Edward Byrne Memorial Justice Assistance Grant (JAG) Program**

**SPECIAL CONDITIONS**

Subrecipient: Pinellas County Board of Commissioners

Subgrant Number: 2020-JAGC-PINE-14-5R-090

Project Title: SEXUAL PREDATOR AND OFFENDER TRACKING (SPOT) UNIT DEPUTY

Pass-through Entity: Florida Department of Law Enforcement

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In addition to the attached standard conditions, the above-referenced grant project is subject to the special conditions set forth below.

Ref# S43916: Per state statute, grant files and records of grant purchases must be maintained for a minimum of 5 fiscal years after completion of grant cycle or project, whichever is applicable.

# Application for Funding Assistance

Florida Department of Law Enforcement  
Justice Assistance Grant - County-wide

## Section 1: Administration

### Subgrant Recipient

**Organization Name:** Pinellas County Board of Commissioners  
**County:** Pinellas

### Chief Official

**Name:** Pat Gerard  
**Title:** Chairperson  
**Address:** 315 Court Street  
**City:** Clearwater  
**State:** FL **Zip:** 33756-5165  
**Phone:** 727-464-3360 **Ext:**  
**Fax:**  
**Email:** pgerard@pinellascounty.org

### Chief Financial Officer

**Name:** Ken Burke  
**Title:** Clerk of the Court  
**Address:** 315 Court Street  
**City:** Clearwater  
**State:** FL **Zip:** 33756-5165  
**Phone:** 727-464-3341 **Ext:**  
**Fax:** 727-464-3341  
**Email:** kburke@pinellascounty.org

# Application for Funding Assistance

Florida Department of Law Enforcement  
Justice Assistance Grant - County-wide

## Section 1: Administration

### Implementing Agency

**Organization Name:** Pinellas County Sheriff's Office  
**County:** Pinellas

### Chief Official

**Name:** Bob Gualtieri  
**Title:** Sheriff  
**Address:** 10750 Ulmerton Road  
**City:** Largo  
**State:** FL                      **Zip:** 33778-1703  
**Phone:** 727-582-6447      **Ext:**  
**Fax:** 727-582-5896  
**Email:** rgualtieri@pcsonet.com

### Project Director

**Name:** Richard Interrante  
**Title:** Grants Specialist  
**Address:** 10750 Ulmerton Road  
**City:** Largo  
**State:** FL                      **Zip:** 33778-1703  
**Phone:** 727-582-6447      **Ext:**  
**Fax:**  
**Email:** rinterrante@pcsonet.com

# Application for Funding Assistance

Florida Department of Law Enforcement  
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## Section 1: Administration

### Section Questions:

Question: If yes to either #1 or #2, describe each practice AND provide a copy of each law or policy to criminaljustice@fdle.state.fl.us.

Answer: Senate Bill 168, Chapter 908 F.S.

Question: Does your jurisdiction have any laws, policies, or practices related to whether, when, or how employees may communicate with the Department of Homeland Security (DHS) or Immigration and Customs Enforcement (ICE)?

Answer: No

Question: Is your jurisdiction subject to any laws from a superior political entity (e.g., a state law that binds a city) that meet the description in question 1?

Answer: Yes



# Application for Funding Assistance

Florida Department of Law Enforcement  
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## Section 2: Project Overview

### General Project Information

**Project Title:** SEXUAL PREDATOR AND OFFENDER TRACKING (SPOT) UNIT DEPUTY  
**Subgrant Recipient:** Pinellas County Board of Commissioners  
**Implementing Agency:** Pinellas County Sheriff's Office  
**Project Start Date:** 10/1/2019      **End Date:** 3/31/2021

### Problem Identification

According to the National Center for Missing & Exploited Children (NCMEC), in 2017 there were 861,837 (264 per 100,000 population) registered sex offenders in the United States, with 69,917 of those offenders and predators residing in Florida. A sexual offender is a person convicted of a sex offense involving a minor, who is released on or after October 1, 1997, from the sanction imposed as a result of the offense. Offenses include but are not limited to sexual activity with a minor, child pornography, kidnapping, luring or enticing a child, human trafficking, and indecent exposure. A sexual predator is a person who has been convicted of a sexually violent offense as defined in Florida Statute 775.21, or he/she is civilly committed under the Florida Jimmy Ryce Sexually Violent Predator Act. Additionally, there is a written court order designating the individual as a sexual predator. Florida law requires sexual predators and offenders to register with the Florida Department of Law Enforcement (FDLE) or the local sheriff's office.

The PCSO SPOT Unit monitors and tracks sexual predators, offenders, and registered career offenders on a countywide basis. The Unit was created in 2000 to track and monitor sexual predators and offenders in the PCSO's jurisdiction. Since 2006, PCSO has assumed responsibility for countywide oversight of sexual predators and offenders. This decision was unanimously made by the Law Enforcement Task Force of the Pinellas Assembly that year. The Task Force concluded that having a single agency cover the entire county would result in a more efficient and effective registration and address verification process. Pinellas County has a high number of offenders and predators. As of December 31, 2018, the total number being monitored was 1,875, which includes 1,664 offenders and 211 predators. Additionally, Pinellas County has 338 registered career offenders the SPOT Unit is tasked with managing. Having adequate staffing to monitor registered sexual predators and offenders in Pinellas County is imperative for the safety of the community, especially with projected increases in this population both statewide and countywide.

The FDLE ranked Pinellas County fifth among Florida's 67 counties for the number of offenders/predators living within its boundaries, although it is the second smallest county in geographic size. Using population and land area figures from the Florida Legislature's Office of Economic and Demographic Research, because of its population density, there are approximately 6.4 offenders/predators per square mile in Pinellas County, compared to .5 (rounded) offenders/predators per square mile throughout Florida. Pinellas has seen the subpopulation of transient offenders increase from 24 in 2008, when this number began to be tracked, to 161 as of December 31, 2018. Florida Statute 943.0435 requires transient offenders report in person every 30 days while maintaining a transient residence.

Repercussions if Need/Issue Not Addressed:



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## Section 2: Project Overview

PCSO will continue tracking the location and movement of sexual predators/offenders and registered career offenders to ensure compliance with the law and assure public safety in Pinellas County. In order to maintain the current level of enforcement, PCSO requests continued JAG funding for one SPOT Unit deputy, allowing the Unit to seamlessly continue monitoring all sexual offenders/predators and registered career offenders countywide. If funded, success will be measured by the ability to continue registering, monitoring, tracking, and apprehending this population of individuals. Other methods will be utilized such as completing required verifications, neighborhood notifications, and community education. Results will be measured by documenting numbers for each of the following: registrations and updates, address verifications completed, neighborhood notifications, and apprehended offenders and absconders. However, without continued JAG funding the SPOT Unit will be reduced by one deputy. This will negatively impact the current level of countywide coverage of sexual predators and offenders in Pinellas County, an area that continues to see an increase of these offenders residing in its community. Ultimately, the SPOT Unit would have difficulty providing services at its current capacity.

### Project Accomplishments to Date:

This is a continuation JAGC program grant for salaries and benefits from 2020-JAGC-PINE-1-Y5-025. This grant was awarded for the project period 10/1/18-12/31/19. Based on 2018 data, the SPOT Unit averaged 571 monthly face-to-face contact registrations in the SPOT Office. Also, the SPOT Unit averaged 352 scheduled re-registrations per month and 101 unscheduled registrations/information updates per month. The number of new annual registrations was 269, approximately 22 per month. Historically, the SPOT Unit enters between 36,000 - 40,000 updates annually in multiple systems. The approximate caseload per deputy was 219 offenders, which includes career offenders.

In the 2018-2019 grant year, the SPOT Unit registered 269 new sexual offenders and predators, conducted 6,589 re-registrations/transient registrations/information updates, performed 4,518 address verifications, distributed 7,993 predator flyer notifications, and made 98 arrests/referrals to State Attorney's Office.

Currently the budget for the Pinellas County will not make allowances for a (SPOT) UNIT DEPUTY. Grant Funding will provide the assistance necessary for this essential personnel that will ensure the integrity and professionalism in the delivery of police services.

### **Project Summary (Scope of Work)**

In 2006, PCSO assumed responsibility for countywide registration, monitoring, apprehending, and tracking of sexual predators and offenders for community notification and address verification. This decision was based upon a study by the Pinellas Assembly's Law Enforcement Task Force, whose goal was to review areas in which law enforcement processes could be streamlined, promoting cost savings and enhancing public safety. The SPOT Unit deputies interact and assist other agencies such as the State Attorney's Office, Florida Department of Law Enforcement, Florida Department of Corrections, and other local law enforcement agencies.

As of December 31, 2018, there are 1,875 offenders/predators in Pinellas County and 338 registered career offenders being tracked. PCSO's SPOT Unit performs the following countywide services: offender and predator neighborhood address



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## Florida Department of Law Enforcement Justice Assistance Grant - County-wide

verifications, community notification of offender movement, on-site verification of residence, apprehending violators, searching for absconders, and conducting investigations and surveillance. Address verifications are conducted quarterly on predators and some offenders but twice annually on remaining offenders. Florida Statute 775.215 applies a 1,000 foot rule, restricting offenders from residing near schools, child care, parks, and playgrounds. Many Florida counties and municipalities have enacted tougher restrictions further limiting options for offenders to live upon release from custody; however, Pinellas County has not. Pinellas is home to the Palace Mobile Home Park a mobile home park that provides residential housing for sex offenders. Consequently, the park has a high concentration of offenders and predators.

Additional statutory requirements that went into effect on October 1, 2014 continue to increase the workload of the SPOT Unit. These requirements include but are not limited to in-person reporting, within 48 hours:

- Any new vehicle which the offender has access to, be it a roommate's, family member's or employer's vehicle;
- If enrolled at a school or place of higher education;
- Before using any internet application having the capacity of two-way communication;
- The acquisition of passports or professional licenses.

Another thing the SPOT Unit must consider is the fact that as the number of transient offenders continues to increase, so too, will the number of offender contacts. Transient offenders also require surveillance by SPOT deputies to confirm and verify address locations.

The SPOT Unit is staffed by one sergeant, nine deputies, and two senior administrative assistants. Each deputy has a primary responsibility of one geographic zone and serves as back up for another. The deputies rotate between on-site registrations and community and neighborhood duties in their individual zones. They perform address verifications, surveillance, neighborhood notifications, and community education. They also provide countywide services to all of Pinellas County's population, but the participants of the program served are the 2,190 sexual predators, sexual offenders, and career criminals currently being supervised in the county.

Based on 2018 data, on average, the Unit adds 22 new registrants (sexual offenders/sexual predators/career offenders) each month. Through the continued funding of one SPOT deputy, to maintain the current SPOT Unit level of public safety with ten sworn members (to include a sergeant) to register and monitor all sexual predators and offenders and registered career offenders both on and off probation throughout Pinellas County. Success will be measured by the ability to continue to register, monitor, track, and apprehend offenders, predators, career registrants and absconders, in addition to completing required verifications, neighborhood notifications and community education.

Pinellas County will use grant funds to provide Salaries and Benefits. Deliverables will be completed in accordance with the contractual agreements between the subrecipient and their local vendor/providers.

Documentation of deliverables performed by the subrecipient and their local



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vendor/providers must be maintained by the subrecipient and made available for monitoring. Example documentation includes, but is not limited to: timesheets, paystubs, activity logs, etc.

Documentation and minimum performance required for drawdown of funds includes the completion of at least one activity described in the scope of work above as attested on the financial expenditure/claim report.

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## Section 2: Project Overview

### Section Questions:

Question: What percentage of the total cost of this project is being funded by sources other than this award?

Answer: 16

Question: What is the combined population of the jurisdiction(s) your agency provides services to (according to the 2010 census)?

Answer: 916542

Question: What is the Operating Capital Outlay threshold used by the subgrantee? If the implementing agency is a sheriff's office, indicate the sheriff's office's threshold instead.

Answer: \$1,000

Question: What is the address of the location being used to provide services for this project?

Answer: 14500 49th Street North, Clearwater, FL 33762

Question: Describe your agency. (e.g., non-profit, community based, government)

Answer: Law Enforcement Agency

Question: What is the name of the jurisdiction(s) your agency provides service to. (e.g., City of Miami, Orange County, State of Florida)

Answer: Pinellas County, Florida

Question: Have you verified that the subgrantee has an active and current registration in SAM.gov?

Answer: Yes

Question: Does the subgrantee receive a single grant in the amount of \$750,000 or more from the U.S. Department of Justice?

Answer: No

Question: Does the implementing agency receive a single grant in the amount of \$750,000 or more from the U.S. Department of Justice?

Answer: No

Question: In your organization's preceding completed fiscal year, did your organization (the subgrantee) receive at least (a) 80 percent or (b) \$25,000,000 of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?

Answer: No

Question: If you answered yes above, does the public have access to information about the compensation of the executives in your organization (the subgrantee) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986? If answer to Part 1, above, was "no," answer N/A.

Answer: No

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## Section 3: Performance

### General Performance Info:

**Performance Reporting Frequency:** Quarterly

**Prime Purpose Area:** 01 - Law Enforcement (Includes Task Forces)

**State Purpose Area:** 1G - General Questions

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### Objectives and Measures

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**Objective:** General Questions - General Questions for All Recipients

**Measure:** General 01

Will your organization be using the crimesolutions.gov website during the grant period regardless of JAG funding? Crimesolutions.gov provides information on several crime reduction and prevention programs and practices.

**Goal:** Yes

**Measure:** General 02

Will your organization be using the The National Training and Technical Assistance Center (NTTAC) during the grant period, regardless of JAG funding? The NTTAC serves as BJA's training and technical assistance center. You can find resources, tools, webinars, and TTA support on a variety of criminal justice issues and initiatives.

**Goal:** Yes

**Measure:** General 03

Will your organization be using the NCJP.org website during the grant period, regardless of JAG funding? NCJP.org contains resources to support strategic planning, program development, and implementation of evidence-based policy and practice.

**Goal:** Yes

**Measure:** General 04

Will your organization be using the Evidence-Based Policing Matrix during the grant period regardless of JAG funding? The Evidence-Based Policing Matrix provides information on evidence-based practices for law enforcement.

**Goal:** Yes

**Measure:** General 05

Will your organization be using the What Works in Reentry Clearinghouse during the grant period regardless of JAG funding? The clearinghouse provides research on the effectiveness of reentry programs and practices.

**Goal:** No

**Measure:** General 06



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## Section 3: Performance

Will your organization be using Research to Practice during the grant period regardless of JAG funding? Research to Practice promotes the dissemination of research on drug courts to practitioners and policymakers.

Goal: No

Measure: General 07

Will your organization be using any other resources during the grant period regardless of JAG funding? If yes, please describe them.

Goal: SPI publications, COPS Office publications, and NCJRS.

Measure: General 08

During the grant period, will your agency conduct or sponsor (with or without JAG funds) a survey or focus group of citizens on any of the following topics? Enter all that apply from the following list: Public satisfaction with police services; public satisfaction with prosecution services; public satisfaction with public defender/indigent defense services; public satisfaction with courts; public perceptions of crime/disorder problems; personal crime experiences of citizens; none of the above; unsure/don't know.

Goal: Public satisfaction with police services; public perceptions of crime/disorder problems; personal crime experiences of citizens.

Measure: General 09

During the grant period, which of the following community activities will your organization be involved in, with or without JAG funds and how often will they each occur (yearly, monthly, etc.)? Choose from the following list: Hosting community meetings; attending community meetings; distributing a newsletter, e-mail, or other bulletin; attending community events; conducting social media activities; conducting outreach to minority populations; other (please describe)

Goal: Hosting community meetings - quarterly;  
Attending community meetings - monthly;  
Distributing a newsletter, email or other bulletin - biweekly;  
Attending community events - quarterly;  
Conducting social media activities - daily/weekly

Measure: General 10

Law Enforcement Agencies ONLY: In which of the following ways has your agency fostered community involvement in the last year? Enter all that apply from the following list: Citizen Review Board or other review board with citizen representation, Citizen's Police Academy, Internships for university or high school students, Volunteer Program, Auxiliary police officer program, Police Cadet Program, k-12 school programs, Youth Athletic Programs, Other (please Describe), None of the above, Unsure/Don't know.

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## Section 3: Performance

**Goal:** Citizens' Police Academy, Internships with university or high school students, Volunteer Program, K-12 school programs, Youth Athletic Programs, Other - Sheriff's Advisory Board, Teen Citizens' Academy, Teen Driver Challenge, Youth Discovery Day, Targeted Response Against Distracted Driving (TRADD), Patrol Ride-Along Program, Explorer Post, Twitter, Facebook, PCSO website, LinkedIn, and YouTube.

**Measure:** General 11

Identify the goal(s) you hope to achieve with your funding. If you have multiple goals, describe each goal separately.

**Goal:** To maintain the current SPOT Unit level of public safety with nine sworn members (including a sergeant) to register/monitor all sexual predators/offenders and registered career offenders both on and off probation throughout Pinellas County. Success will be measured by the ability to continue to register, monitor, track and apprehend offenders, predators, career registrants and absconders, in addition to completing required verifications, neighborhood notifications and community education.

**Measure:** General 12

Are the subrecipient and implementing agency aware that they will be required to report on the status of the identified goals during each reporting period?

**Goal:** Yes

**Measure:** General 13

Describe any barriers you may encounter which may prevent you from achieving your identified goal(s).

**Goal:** None

**Measure:** General 14

Are you aware that the Office of Criminal Justice Grants encourages recipients to report on any noteworthy accomplishments, success stories, or program results that they would like to showcase?

**Goal:** Yes

**Measure:** General 11b

What major activities are planned for each of your goals listed in question 11?

**Goal:** Major activities include: registering, monitoring, tracking and apprehending sexual offenders, predators, and career offenders, conducting neighborhood notifications of sexual predators, maintaining and updating offender/predator files and timely entries into a variety of databases, conducting criminal investigations regarding compliance issues, conducting surveillance operations, conducting community awareness and educational programs regarding sexual predators and



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## Section 3: Performance

offenders.

**State Purpose Area:** 2P - Personnel

### Objectives and Measures

**Objective:** Personnel Questions - Questions for all recipients using personnel.

Measure: Personnel 1

During the grant period, approximately how many overtime hours will be funded by JAG?

Goal: 0

Measure: Personnel 2

During the grant period, how many personnel will have their salary or pay funded, at least partially, with JAG funds?

Goal: 1

Measure: Personnel 3

How many new positions will be created with JAG funds during the grant period?

Goal: 0

**State Purpose Area:** R25 - Questions for recipients of an award \$25,000 or more.

### Objectives and Measures

**Objective:** LE General - Law enforcement questions for recipients of an award \$25,000 or more.

Measure: LE01

How many sworn personnel with general arrest powers does your agency have on staff?

Goal: 854

Measure: LE02

Of the sworn personnel, how many are JAG funded?

Goal: 1

Measure: LE03

How many non-sworn employees does your agency have on staff?

Goal: 1183

Measure: LE04



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## Section 3: Performance

- Of the non-sworn personnel, how many are JAG funded?
- Goal: 0
- Measure: LE05  
Does your agency utilize a strategic management accountability system to gather and disseminate information within the agency (e.g., CompStat, stratified policing)? Strategic management accountability systems typically include a focus on the use of relevant and timely data, the production of reports detailing problems and actions taken to solve them, and regular meetings with management to discuss strategies.
- Goal: Yes
- Measure: LE06  
Does your agency use any of the following deconfliction tools? Choose all that apply from the following list: RISSafe, SAFETNet, Case Explorer, None of the above, unsure/don't know.
- Goal: Case Explorer
- Objective:** LE Program - Program specific law enforcement questions for recipients of an award \$25,000 or more.
- Measure: LE07  
During the grant period, will you operate a law enforcement program partially or fully funded by JAG funds? If yes, what is the name of that program? If you are operating more than one program, include the names of each one.
- Goal: Yes. Sexual Predator and offender Tracking (SPOT) Unity Deputy.
- Measure: LE08  
During the grant period, will you operate a task force partially or fully funded by JAG funds? If yes, what is the name of the program? If you are operating more than one program, include the names of each one.
- Goal: No
- Measure: LE09  
If you will operate a program or task force with JAG funds during the grant period, what percentage of the program's total costs will be paid for with sources other than this JAG award? If you will operate more than one program, answer for each separately.
- Goal: 16%
- Measure: LE10  
If you will operate a program or task force with JAG funds during the grant period, what was the initiation year of that program, regardless of when it received JAG funding? If you operated more than one program, answer for each separately.

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## Section 3: Performance

Goal: 2000

Measure: LE11

Are you or a partner planning to conduct an evaluation of your program or task force? If you will operate more than one program, answer for each separately.

Goal: No

Measure: LE12

If you or a partner are planning to conduct an evaluation of your program or task force, are you aware that you will be required to report on the status of that evaluation?

Goal: N/A

Measure: LE13

If you will operate a program or task force with JAG funds during the grant period, which of the following violent crime/problems will it focus on? If you will operate more than one program, answer for each separately. Choose all that apply from among the following list: All violent crime in the jurisdiction, Homicide, Human Trafficking, Domestic Violence, Child Abuse, Child Pornography and Exploitation, Sexual Assault, Terrorism, None of the above.

Goal: None of the above

Measure: LE14

If you will operate a program or task force with JAG funds during the grant period, which of the following property crime/problems will it focus on? If you will operate more than one program, answer for each separately. Choose all that apply from among the following list: All Property Crime in the Jurisdiction, Auto theft, Burglary.

Goal: None of the above

Measure: LE15

If you will operate a program or task force with JAG funds during the grant period, which of the following societal crimes/problems will it focus on? If you will operate more than one program, answer for each separately. Choose all that apply from among the following list: Drug crime, Prescription drug crime, Disorder/quality-of-life incidents, Prostitution, Cybercrime, White-collar crime, Healthcare fraud, Status offenses (truancy, underage drinking, etc.), None of the above.

Goal: None of the above

Measure: LE16

If you will operate a program or task force with JAG funds during the grant period, which of the following general crime/problems will it focus on? If



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## Section 3: Performance

you will operate more than one program, answer for each separately. Choose all that apply from among the following list: All crime in the jurisdiction, Hate crime, Gun Crime, Traffic violations/crashes, Other (please describe).

**Goal:** OTHER: Sexual Predator and Offender Tracking

**Measure:** LE17

If you will operate a program or task force with JAG funds during the grant period, who is the target population. If you will operate more than one program, answer for each separately. Choose all that apply from the following list: Adults, Elderly, Gangs, Juvenile Delinquents, Children of incarcerated/justice-involved parents, Drug-endangered children, Persons with mental illness, All victims, Other (please describe).

**Goal:** OTHER: The target population will be sexual predators/offenders and registered career offenders in Pinellas County.

**Measure:** LE18

If you will operate a program or task force with JAG funds during the reporting period, what is the primary target area of that program or task force? If you will operate more than one program, answer for each separately. Choose from the following list: Specific landmark or place (mall, park, theater), hot spots (a number of blocks or street segments that have been identified as experiencing a disproportionate share of the jurisdiction's problem), entire jurisdiction, multi-jurisdictional/cross jurisdictional.

**Goal:** Entire jurisdiction of Pinellas County

**Measure:** LE19

If you will operate a program or task force with JAG funds during the reporting period, will that program focus efforts around any of the following models? If you will operate more than one program, answer for each separately. Choose all that apply from the following list: Community oriented approach, problem solving approach, geographic focus, high-rate offender focus, high-rate group/gang focus, Procedural justice, Unsure/Don't know, Other (please describe).

**Goal:** Community-oriented policing

**Objective:** LE Services - Service specific law enforcement questions for recipients of an award \$25,000 or more.

**Measure:** LE20

Will you provide situational crime prevention and crime prevention through environmental design strategies as part of your program? (approaches that change the perceived opportunities for a crime, so the offender will believe the crime is more difficult, has more risk, or provides less rewards, for example, access control to parking lots or improved lighting on a walkway) If you will operate more than one program, answer for each separately.



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Goal: No

Measure: LE21

Will you provide youth development services as part of your program? (programs that promote positive behaviors and decrease negative behavior in youth, for example, any of the Blueprints programs.) Describe the services provided. If you will operate more than one program, answer for each separately.

Goal: No

Measure: LE22

Will you provide crime awareness services as part of your program? (programs aimed at increasing the awareness of a crime problem including solutions to prevent crime, for example a Lock It or Lose It program.) Describe the services provided. If you will operate more than one program, answer for each separately.

Goal: Yes. Neighborhood notifications of sexual predators entering or relocating within Pinellas County and conducting community awareness and educational programs regarding sexual predators and offenders.

Measure: LE23

Will you provide increased personal safety services as part of your program? (programs that provide instruction on increasing personal safety, for example, a Rape Aggression Defense (RAD) class.) Describe the services provided. If you will operate more than one program, answer for each separately.

Goal: No

Measure: LE24

Will you provide community building services with your program? (programs that promote community cohesion, including communication between the community and elements of the criminal justice system, for example, National Night Out.) Describe the services provided. If you will operate more than one program, answer for each separately.

Goal: No

Measure: LE25

Will you provide any other crime prevention services not described in this report with that program? Describe the services provided. If you will operate more than one program, answer for each separately.

Goal: No

**Objective:** LE Tracking - Tracking questions for Law Enforcement recipients of an award \$25,000 or more.

Measure: LE26

Approximately how many criminal groups will be disrupted under your

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## Section 3: Performance

program during the grant period? Disrupted means impeding the normal and effective operation of the group, as indicated by changes in leadership or methods of operation. If you will operate more than one program, answer for each separately.

Goal: 0

Measure: LE27

How many criminal groups will be dismantled under your program during the grant period? Dismantled means destroying the organization's leadership, financial base, or supply network so that the organization is incapable of operating. If you will operate more than one program, answer for each separately.

Goal: 0

Measure: LE28

Approximately how many firearms will your program or task force seize during the grant period? If you will operate more than one program, answer for each separately.

Goal: 0

Measure: LE29

Approximately how many firearms will your program or task force enter into the National Integrated Ballistic Information Network (NIBIN) during the reporting period? If you will operate more than one program during the reporting period, answer separately for each.

Goal: 0

Measure: LE30

Approximately how many firearms will your program or task force trace through the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) during the reporting period? If you will operate more than one program during the reporting period, answer separately for each.

Goal: 0

Measure: LE31

Regardless of JAG funding, how many total asset forfeiture cases will your program or task force file during this grant period?

Goal: 0

Measure: LE32

Regardless of JAG funding, which of the following items will your program or task force seize during the grant period as part of a state or federal asset forfeiture case? Choose all that apply from the following list: Drugs, currency, firearms, other physical property, none of the above.

# Application for Funding Assistance

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## Section 3: Performance

Goal: None of the above

Measure: LE33

Are you aware that you will be required to complete the law enforcement questionnaire and submit it to your grant manager alongside each performance report.

Goal: Yes



# Application for Funding Assistance

Florida Department of Law Enforcement  
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## Section 4: Financial

### General Financial Info:

**Note: All financial remittances will be sent to the Chief Financial Officer of the Subgrantee Organization.**

**Financial Reporting Frequency for this Subgrant:** Quarterly

**Is the subgrantee a state agency?:** No

**FLAIR / Vendor Number:** 596000800

### Budget:

Budget Category	Prime	Match	Total
Salaries and Benefits	\$100,000.00	\$0.00	\$100,000.00
Contractual Services	\$0.00	\$0.00	\$0.00
Expenses	\$0.00	\$0.00	\$0.00
Operating Capital Outlay	\$0.00	\$0.00	\$0.00
Indirect Costs	\$0.00	\$0.00	\$0.00
<b>-- Totals --</b>	<b>\$100,000.00</b>	<b>\$0.00</b>	<b>\$100,000.00</b>
<b>Percentage</b>	<b>100.0</b>	<b>0.0</b>	<b>100.0</b>

### Project Generated Income:

**Will the project earn project generated income (PGI)?** No

# Application for Funding Assistance

Florida Department of Law Enforcement  
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## Section 4: Financial (cont.)

### Budget Narrative:

Budget Narrative:

TOTAL GRANT BUDGET REQUEST FOR 84% OF SALARY AND BENEFITS: \$100,000

Salary:

The annual salary of one SPOT deputy position is calculated as follows:

$\$36.3846/\text{hour} \times 2,080 \text{ hours} = \$75,680$  (rounded)

Total Salary: \$75,680

Benefits:

The annual benefits associated with one SPOT deputy position are calculated as follows:

FICA ( $\$75,680 \times 7.65\%$ ) = \$5,790 (rounded)

Florida Retirement = \$12,318

Health/Dental/Vision = \$24,710

Life Insurance = \$160

Disability = \$390

Total Benefits: \$43,368

Total Salary and Benefits: \$119,048

The funded position will work 100% of the time on the project. The funding request is for 84% of the total salary and benefits for this position. The remaining 16% balance will be paid out of PCSO's general revenue budget.

# Application for Funding Assistance

Florida Department of Law Enforcement  
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## Section 4: Financial

### Section Questions:

Question: If Expenses or Operating Capital Outlay are included in your budget, what will be the method of procurement for those items? (e.g., competitive bid, sole source, state term contract)

Answer: N/A

Question: If indirect cost is included, explain the indirect cost plan. Provide documentation of approval.

Answer: N/A

Question: If contractual services in the budget are based on unit costs, provide a definition and breakdown of cost for each service. Include the methodology for the unit cost plan and when it was approved.

Answer: N/A

Question: If the budget contains salaries and benefits, will this project result in a net personnel increase, or continue to fund a prior federally grant funded net personnel increase?

Answer: Yes



# Edward Byrne Memorial Justice Assistance Grant (JAG) Program

## SUBAWARD STANDARD CONDITIONS

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The State of Florida, Department of Law Enforcement (FDLE) is a recipient of federal JAG funds. FDLE, as the non-federal pass-through entity and State Administering Agency (SAA) for this program, subawards JAG funds to eligible units of government. All subawards made by FDLE to units of government under this program require compliance with the agreement and Standard Conditions upon signed acceptance of the subaward.

The Department will only reimburse subrecipients for authorized activities. The Department will not reimburse for costs incurred for any purpose other than those specified in the agreement. Failure to comply with provisions of this agreement, or failure to perform grant activities as specified in the agreement, will result in required corrective action up to and including financial consequences. A financial consequence may be imposed for non-compliance in accordance with 2 C.F.R. § 200 and these Standard Conditions, including but not limited to project costs being disallowed, withholding of federal funds and/or termination of the project.

### GENERAL REQUIREMENTS

All subrecipients must comply with the financial and administrative requirements set forth in the following:

Current edition of the U.S. Department of Justice (DOJ) Grants Financial Guide  
[https://ojp.gov/financialguide/doj/pdfs/DOJ\\_FinancialGuide.pdf](https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf)

Office of Management and Budget (OMB) Uniform Grant Guidance (2 CFR Part 200)  
Subpart A, Definitions  
Subparts B-D, Administrative Requirements  
Subpart E, Cost Principles  
Subpart F, Audit Requirements and all applicable Appendices

Code of Federal Regulations: [www.gpo.gov/fdsys/](http://www.gpo.gov/fdsys/)  
2 C.F.R. §175.15(b), Award Term for Trafficking in Persons  
28 C.F.R. §38, Equal Treatment for Faith-Based Organizations  
28 C.F.R. § 66, U.S. Department of Justice Common Rule for State and Local Governments  
28 C.F.R. § 83, Government-Wide Requirements for Drug-Free Workplace  
28 C.F.R. §§ 18, 22, 23, 30, 35, 42, 61, and 63

State of Florida General Records Schedule GS1-SL for State and Local Government Agencies:  
<http://dos.myflorida.com/media/693574/general-records-schedulegs01-sl.pdf> and  
<http://dos.myflorida.com/media/698314/g2-sl-2017-final.pdf>

State of Florida Statutes  
Section 215.971, F.S., Agreements funded with federal or state assistance  
Section 215.985, F.S., Transparency in government spending

## DEFINITIONS

**Disallowed costs** means those charges to a Federal award that the Federal awarding agency or pass-through entity determines to be unallowable, in accordance with the applicable Federal statutes, regulations, or the terms and conditions of the Federal award.

**Equipment** means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. See also §§200.12 *Capital assets*, 200.20 *Computing devices*, 200.48 *General purpose equipment*, 200.58 *Information technology systems*, 200.89 *Special purpose equipment*, and 200.94 *Supplies*.

**Grant agreement** means a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity that, consistent with 31 U.S.C. 6302, 6304, is used to enter into a relationship the principal purpose of which is to transfer anything of value from the Federal awarding agency or pass-through entity to the non-Federal entity to carry out a public purpose authorized by a law of the United States (see 31 U.S.C. 6101(3)); and not to acquire property or services for the Federal awarding agency or pass-through entity's direct benefit or use; and is distinguished from a cooperative agreement in that it does not provide for substantial involvement between the Federal awarding agency or pass-through entity and the non-Federal entity in carrying out the activity contemplated by the Federal award.

**Improper payment** means any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements. Improper payment also includes any payment to an ineligible party, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received (except for such payments where authorized by law), any payment that does not account for credit for applicable discounts, and any payment where insufficient or lack of documentation prevents a reviewer from discerning whether a payment was proper.

**Micro-purchase** means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. The non-Federal entity uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and cost. The micro-purchase threshold is set by the Federal Acquisition Regulation

in 48 CFR Subpart 2.1 (Definitions). It is \$3,500 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation.

**Modified Total Direct Cost (MTDC)** means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

**Non-Federal entity** is a state, local government, Indian tribe, institution of higher education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient.

**Non-federal pass-through entity** is a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program; the Florida Department of Law Enforcement (FDLE) is the non-federal pass-through entity for this agreement, also referred to as the State Administering Agency (SAA).

**Period of performance** means the time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award. The Federal awarding agency or pass-through entity must include start and end dates of the period of performance in the Federal award (see §§200.210 Information contained in a Federal award paragraph (a)(5) and 200.331 Requirements for pass-through entities, paragraph (a)(1)(iv)).

**Protected Personally Identifiable Information (PII)** means an individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to social security numbers; passport numbers; credit card numbers; clearances; bank numbers; biometrics; date and place of birth; mother's maiden name; criminal, medical, and financial records; and educational transcripts. This does not include PII that is required by law to be disclosed. (See also § 200.79 Personally Identifiable Information (PII)).

**Questioned cost** means a cost that is questioned by the auditor because of an audit finding 1) that resulted from a violation or possible violation of a statute, regulation, or the terms and conditions of a Federal award, including for funds used to match Federal funds; 2) where the costs, at the time of the audit, are not supported by adequate documentation; or 3) where the costs incurred appear unreasonable and do



not reflect the actions a prudent person would take in the circumstances.

**Simplified acquisition threshold** means the dollar amount below which a non-Federal entity may purchase property or services using small purchase methods. Non-Federal entities adopt small purchase procedures in order to expedite the purchase of items costing less than the simplified acquisition threshold. The simplified acquisition threshold is set by the Federal Acquisition Regulation at 48 C.F.R. Subpart 2.1 (Definitions) and in accordance with 41 U.S.C. § 1908. As of the publication of this part, the simplified acquisition threshold is \$250,000, but this threshold is periodically adjusted for inflation. (Also see definition of Micro-purchase, 2 C.F.R. § 200.67)

**Subaward** is an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual who is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

**Subrecipient** means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

**Supplies** means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life. See also §§200.20 Computing devices and 200.33 Equipment.

## SECTION I: TERMS AND CONDITIONS

**1.0 Payment Contingent on Appropriation and Available Funds** - The State of Florida's obligation to pay under this agreement is contingent upon an annual appropriation by the Florida Legislature. Furthermore, the obligation of the State of Florida to reimburse subrecipients for incurred costs is subject to available federal funds.

**2.0 Commencement of Project** - If a project is not operational within 60 days of the original start date of the award period, the subrecipient must report by letter to the Department the steps taken to initiate the project, the reasons for delay, and

the expected start date.

If a project is not operational within 90 days of the original start date of the award period, the subrecipient must submit a second statement to the Department explaining the implementation delay.

Upon receipt of the ninety (90) day letter, the Department shall determine if the reason for delay is justified or shall, at its discretion, unilaterally terminate this agreement and re-obligate subaward funds to other Department approved projects. The Department, where warranted by extenuating circumstances, may extend the starting date of the project past the ninety (90) day period, but only by formal written adjustment to this agreement.

**3.0 Supplanting** - The subrecipient agrees that funds received under this award will not be used to supplant state or local funds, but will be used to increase the amounts of such funds that would, in the absence of federal funds, be made available for law enforcement activities.

**4.0 Personnel Changes** - The subrecipient agrees to promptly notify the Department through the SIMON Help Desk of any change in chief officials or key project staff, including changes to contact information or title changes. The subrecipient acknowledges that some changes in points of contact will require formal grant adjustment to reflect the change in the agreement.

**5.0 Non-Procurement, Debarment and Suspension** - The subrecipient agrees to comply with Executive Order 12549, Debarment and Suspension and 2 C.F.R. § 180, "OMB Guidelines To Agencies On Government wide Debarment And Suspension (Non-procurement)". These procedures require the subrecipient to certify it shall not enter into any lower tiered covered transaction with a person who is debarred, suspended, declared ineligible or is voluntarily excluded from participating in this covered transaction, unless authorized by the Department. If the subaward is \$100,000 or more, the sub recipient and implementing agency certify that they and their principals:

- 1) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of federal benefits by a state or federal court, or voluntarily excluded from covered transactions by any federal department or agency;
- 2) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal



offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

- 3) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses enumerated in paragraph (a)(ii) of the "Lobbying, Debarment and Drug Free Workplace" certification; and
- 4) Have not within a three-year period preceding this application had one or more public transactions (federal, state, or local) terminated for cause or default.

**6.0 Federal Restrictions on Lobbying** - In general, as a matter of federal law, federal funds may not be used by any subrecipient at any tier, either directly or indirectly, to support or oppose the enactment, repeal, modification, or adoption of any law, regulation, or policy, at any level of government. See 18 U.S.C. § 1913.

Another federal law generally prohibits federal funds from being used by any subrecipient at any tier, to pay any person to influence (or attempt to influence) a federal agency, a Member of Congress, or Congress (or an official or employee of any of them) with respect to the awarding of a federal grant or cooperative agreement, subgrant, contract, subcontract, or loan, or with respect to actions such as renewing, extending, or modifying any such award. See 31 U.S.C. § 1352.

**7.0 State Restrictions on Lobbying** - In addition to the provisions contained above, the expenditure of funds for the purpose of lobbying the legislature or a state agency is prohibited under this agreement.

**8.0 Additional Restrictions on Lobbying** - The subrecipient understands and agrees that it cannot use any federal funds, either directly or indirectly, in support of the enactment, repeal, modification or adoption of any law, regulation or policy, at any level of government, without the express prior written approval of the Office of Justice Programs.

**9.0 "Pay-to-Stay"** - Funds from this award may not be used to operate a "pay-to-stay" program in any local jail. Furthermore, no funds may be given to local jails that operate "pay-to-stay"

programs. "Local jail", as referenced in this condition, means an adult facility or detention center owned and/or operated by city, county, or municipality. It does not include juvenile detention centers. "Pay-to-stay" programs as referenced in this condition, means a program by which extraordinary services, amenities and/or accommodations, not otherwise available to the general inmate population, may be provided, based upon an offender's apparent ability to pay, such that disparate conditions of confinement are created for the same or similar offenders within a jurisdiction.

**10.0 The Coastal Barrier Resources Act** - The subrecipient will comply and assure the compliance of all contractors with the provisions of the Coastal Barrier Resources Act (P.L. No. 97-348) dated October 18, 1982 (16 USC 3501 et seq.) which prohibits the expenditure of most new federal funds within the units of the Coastal Barrier Resources System.

**11.0 Background Check** - Whenever a background screening for employment or a background security check is required by law for employment, unless otherwise provided by law, the provisions of § 435, F.S. shall apply.

All employees in positions designated by law as positions of trust or responsibility shall be required to undergo security background investigations as a condition of employment and continued employment. For the purposes of the subsection, security background investigations shall include, but not be limited to, employment history checks, fingerprinting for all purposes and checks in this subsection, statewide criminal and juvenile records checks through the Florida Department of Law Enforcement, and federal criminal records checks through the Federal Bureau of Investigation, and may include local criminal records checks through local law enforcement agencies.

Such background investigations shall be conducted at the expense of *the employing agency or employee*.

**12.0 Privacy Certification** - The subrecipient must comply with all confidentiality requirements of 34 U.S.C. § 10231 and 28 C.F.R. § 22 that are applicable to collection, use, and revelation of data or information. Subrecipient further agrees, as a condition of grant approval, to submit a Privacy Certificate that is in accord with requirements of 28 C.F.R. §§ 22 and, in particular, 22.23. Privacy Certification forms must be signed by the subrecipient or implementing



agency chief official or an individual with formal, written signature authority for the chief official.

- 13.0 Conferences and Inspection of Work** - Conferences may be held at the request of any party to this agreement. At any time, a representative of the Department, of the U.S. Department of Justice, or the Auditor General of the State of Florida, have the right of visiting the project site to monitor, inspect and assess work performed under this agreement.
- 14.0 Insurance for Real Property and Equipment** - The subrecipient must, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired or improved with Federal funds as provided to property owned by the non-Federal entity.
- 15.0 Flood Disaster Protection Act** - The sub recipient will comply with Section 102(a) of the Flood Disaster Protection Act of 1973, Public Law 93-234, 87 Stat. 975, requiring that the purchase of flood insurance in communities where such insurance is available as a condition of the receipt of any federal financial assistance for construction or acquisition purposes for use in any area that has been identified as an area having special flood hazards.
- 16.0 Immigration and Nationality Act** - No public funds will intentionally be awarded to any contractor who knowingly employs unauthorized alien workers, constituting a violation of the employment provisions contained in 8 U.S.C. Section 1324(a), Section 274(A) of the Immigration and Nationality Act ("INA"). The Department shall consider the employment by any contractor of unauthorized aliens a violation of Section 274(A) of the INA. Such violation by the subrecipient of the employment provisions contained in Section 274(A) of the INA shall be grounds for unilateral cancellation of this contract by the Department.

## SECTION II: CIVIL RIGHTS REQUIREMENTS

- 1.0 Participant Notification of Non-discrimination** FDLE does not discriminate on the basis of race, color, religion, national origin, sex, disability or age in the delivery of services, benefits or in employment.
- 2.0 Title VI of the Civil Rights Act of 1964** - The subrecipient at any tier, must comply with all applicable requirements of 28 CFR § 42, specifically including any applicable requirements in Subpart E that relate to an equal employment opportunity program.

**Equal Employment Opportunity Certification (EEOC)** - A subrecipient or implementing agency must submit an EEO Certification annually within 120 days of award.

**Equal Employment Opportunity Program (EEOB)** - A subrecipient or implementing agency must comply with all applicable requirements in 28 C.F.R. §42, Subpart E.

Subrecipients are advised to use the Office for Civil Rights EEO Reporting Tool to satisfy this condition (<https://ojp.gov/about/ocr/eeop.htm>).

- 3.0 Title IX of the Education Amendments of 1972** If the subrecipient operates an education program or activity, the subrecipient must comply with all applicable requirements of 28 C.F.R. § 54, "Nondiscrimination on the basis of sex in education programs or activities receiving federal financial assistance."

- 4.0 Equal Treatment for Faith Based Organizations** The subrecipient at any tier, must comply with all applicable requirements of 28 C.F.R. § 38, "Equal Treatment for Faith Based Organizations", specifically including the provision for written notice to current or prospective program beneficiaries.

- 5.0 Americans with Disabilities Act** - Subrecipients must comply with the requirements of the Americans with Disabilities Act (ADA), Public Law 101-336, which prohibits discrimination on the basis of disability including provision to provide reasonable accommodations.

- 6.0 Section 504 of the Rehabilitation Act of 1973 (28 C.F.R. § 42, Subpart G)** - Subrecipients must comply with all provisions prohibiting discrimination on the basis of disability in both employment and the delivery of services.

- 7.0 Age Discrimination Act of 1975** - Subrecipients must comply with all requirements in Subpart I of 28 C.F.R. §42 which prohibits discrimination based on age in federally assisted programs.

- 8.0 Limited English Proficiency (LEP)** - In accordance with Department of Justice Guidance pertaining to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, subrecipients of federal financial assistance must take reasonable steps to provide meaningful access to their programs and activities for persons with LEP. FDLE strongly advises subrecipients to have a written LEP Language Access Plan. For more information visit [www.lep.gov](http://www.lep.gov).

- 9.0 Finding of Discrimination** - In the event a federal or state court or federal or state administrative agency makes, after a due



process hearing, a finding of discrimination on the grounds of race, color, religion, national origin, sex, or disability against a subrecipient of funds, the subrecipient will forward a copy of the finding to FDLE and to the Office for Civil Rights, Office of Justice Programs.

- 10.0 Filing a Complaint** - If the subrecipient or any of its employees, contractors, vendors, or program beneficiaries has a discrimination complaint, they may file a complaint with the subrecipient, with FDLE, or with the Office for Civil Rights.

Discrimination complaints may be submitted to FDLE at Office of the Inspector General, Post Office Box 1489, Tallahassee, Florida 32302-1489, or online at [info@fdle.state.fl.us](mailto:info@fdle.state.fl.us). Any discrimination complaints filed with FDLE will be reviewed by FDLE's Inspector General and referred to the Office for Civil Rights, the Florida Commission on Human Relations, or the Equal Employment Opportunity Commission, based on the nature of the complaint.

Discrimination complaints may also be submitted to the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice, 810 7<sup>th</sup> Street, Northwest, Washington, D.C. 20531, or by phone at (202) 307-0690.

- 11.0 Retaliation** - In accordance with federal civil rights laws, the subrecipient shall not retaliate against individuals for taking action or participating in action to secure rights protected by these laws.
- 12.0 Non-discrimination Contract Requirements** - Subrecipients must include comprehensive Civil Rights nondiscrimination provisions in all contracts funded by the subrecipient.
- 13.0 Pass-through Requirements** - Subrecipients are responsible for the compliance of contractors and other entities to whom they pass-through funds including compliance with all Civil Rights requirements. These additional tier subrecipients must be made aware that they may file a discrimination complaint with the subrecipient, with FDLE, or with the USDOJ Office for Civil Rights and provided the contact information.

### SECTION III: FINANCIAL REQUIREMENTS AND RESPONSIBILITY

- 1.0 Fiscal Control and Fund Accounting Procedures** - All expenditures and cost accounting of funds shall conform to the DOJ Grants Financial Guide, the 28 C.F.R. § 66, and 2 C.F.R. § 200 as applicable, in their entirety.

Subrecipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. Financial management systems must be able to record and report on the receipt, obligation, and expenditure of grant funds; and able to accommodate a fund and account structure to separately track receipts, expenditures, assets, and liabilities for awards, programs, and additional tiered subrecipients. The awarded funds may or may not be an interest bearing account, but any earned interest must be used for program purposes and expended before the federal grant period end date. Any unexpended interest remaining at the end of the federal grant period must be submitted to the Office of Criminal Justice Grants for transmittal to DOJ.

- 2.0 Match** - The value or amount of any "non-federal share," "match," or cost-sharing contribution incorporated into the approved budget is part of the "project cost" for purposes of the 2 C.F.R. § 200 Uniform Requirements, and is subject to audit. In general, the rules and restrictions that apply to award funds from federal sources also apply to funds in the approved budget that are provided as "match" or through "cost sharing."

### SECTION IV: SUBAWARD MANAGEMENT AND REPORTING REQUIREMENTS

- 1.0 Obligation of Subrecipient Funds** - Subaward funds shall not under any circumstances be obligated prior to the effective date, or subsequent to the termination date, of the period of performance. Only project costs incurred on or after the effective date, and on or prior to the termination date of the subrecipient's project are eligible for reimbursement. All payments must be completed within forty-five (45) days of the end of the subaward period of performance.
- 2.0 Use of Funds** - Grant funds may be used only for the purposes in the subrecipient's approved application. Subrecipients shall not undertake any work or activities not described in the approved grant award, and that use staff, equipment, or other goods or services paid for with grant funds, without prior written approval from FDLE's Office of Criminal Justice Grants (OCJG).
- 3.0 Advance Funding** - Advance funding may be provided to a subrecipient upon a written request to the Department. The request must be electronically signed by the subrecipient or