IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,

Plaintiffs, on behalf of themselves and all others similarly situated,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

PAMELA J. BONDI, in her official capacity as United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official capacity as Acting Head of the Office of Justice Programs,

Defendants.

Case No. 1:25-cv-1643

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs Vera Institute of Justice, Children and Youth Justice Center d/b/a Center for Children & Youth Justice, Chinese for Affirmative Action d/b/a Stop AAPI Hate, FORCE Detroit, Health Resources in Action, and Vera Institute of Justice respectfully move pursuant to Federal Rule of Civil Procedure 65 for a preliminary injunction. For the reasons presented in the accompanying memorandum in support of this motion, the Court should enter an order that enjoins Defendants from implementing their decision in April 2025 to terminate grants issued by the U.S. Department of Justice Office of Justice Programs. The specific contours of the relief that Plaintiffs seek are provided in the accompanying proposed order.

Dated: May 22, 2025

Respectfully submitted,

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PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION FOR A PRELIMINARY INJUNCTION

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INTRODUCTION

In April 2025, the Department of Justice's Office of Justice Programs abruptly and summarily terminated 373 multi-year grant and cooperative agreements awarding more than $820 million in essential funding.[1] With no prior notice, OJP sent a form email to Plaintiffs and other grantees, offering the same unsupported explanation that Plaintiffs' "awards no longer effectuate[] the program goals or agency priorities." OJP ordered the grantees to stop work immediately and informed them that they would be reimbursed only up to the date of the termination letter.

Plaintiffs are non-profit organizations that were awarded federal grant funding. They work to train and assist law enforcement, correctional facilities staff, prosecutors, and states and localities. They work with vulnerable populations who have been victims of crime, including by providing free interpretation services that allow Deaf and disabled victims of crime to communicate with law enforcement, and by training law enforcement to and serve individuals with disabilities who are victims of sex or labor trafficking. They fund and work on the frontlines to successfully interrupt gun crime and gang violence for juveniles and adults, including those at the highest risk for gun violence, in cities across the country. They fund and work in hospitals to provide lifesaving assistance for violently injured victims and their families, while also mitigating retaliation that may arise from the situation. As a direct result of OJP's unlawful termination of these grants, services to many of these populations have abruptly ceased. Staff have been laid off without meaningful alternatives for employment, and many more staff will soon be laid off without grant funding. In some places, members of the communities they serve *will* lose their lives because of the disruption in critical services caused by OJP's unlawful termination of Plaintiffs' grants.

The termination of Plaintiffs' grants had an immediate and irreparable impact on Plaintiff organizations, their staff, their partners, and the individuals and communities that they serve. These terminations have led to an abrupt discontinuation of vital services to some of the most vulnerable in our communities making individuals, law enforcement, victims of crime, and the communities in

[1] For ease of reference, the agreements at issue will be referred to as "grants," unless otherwise noted.

which they live less safe. Absent a preliminary injunction, Plaintiffs will suffer irreparable harm—multi-year projects will terminate abruptly, specialized staff will be laid off, critical services will be withdrawn from communities facing some of the gravest safety concerns—all compounded by lasting damage to hard-earned reputational trust.

OJP's *en masse* and unreasoned terminations of over $800 million in grant funding is quintessential unlawful agency action that violates the APA. These terminations violate the Constitution, agency regulations, exceed OJP's lawful authority, and are arbitrary and capricious. *See* 5 U.S.C. § 706(2)(A)–(C). OJP's termination of Plaintiffs' grants is unlawful and should be enjoined during the pendency of this litigation.

OJP's termination of Plaintiffs' grants based on 2 C.F.R. § 200.340(a)(4) is contrary to law and violates the Administrative Procedure Act (APA). OJP did not provide clear and unambiguous notice that it could terminate awards based on a failure to effectuate agency priorities, which it is required to do under its regulations. Nor is OJP permitted to terminate a grant based on a "change" in agency priorities. To do so would render restrictions on agencies' terminations of grants meaningless, and it would give OJP and any other executive branch agency the ability to terminate any grant award by simply invoking a change in agency priorities. To interpret grant termination regulations in this manner would impermissibly allow an agency to sweep aside millions or billions of dollars and raises a host of constitutional issues. But it is clear that one of the purposes of Section 200.340 was to ensure that "agencies are not able to terminate grants arbitrarily," 85 Fed. Reg. 49506, 49509 (Aug. 13, 2020), to guard against the very sort of arbitrary and unlawful grant terminations that OJP has attempted to carry out in this case. Because DOJ's regulations do not permit this sort of termination, OJP's terminations of Plaintiffs' grants must be set aside as contrary to law.

OJP's terminations are unlawful for another reason. Under the APA, grantees are entitled to reasoned decisionmaking before the government terminates millions of dollars in vital grant funding with no notice. OJP's *en masse* termination of more than 365 grants, on the same day, using the same

cursory and unspecific rationale, represents nearly every hallmark of arbitrary and capricious agency action.

OJP's terminations also violate the Constitution and are *ultra vires*. OJP violated Plaintiffs' Due Process rights when it terminated their grants without allowing Plaintiffs a reasonable opportunity to object to the terminations, and its reliance on 2 C.F.R. § 200.340(a)(4) is void for vagueness. OJP's refusal to spend funds that Congress appropriated also violates the separation of powers, the Take Care Clause, and the Appropriations and Spending Clauses of the Constitution. Although Defendants may have discretion in allocating appropriated funds, they do not have the discretion to refuse to spend more than $800 million dollars of appropriated funding without seeking congressional approval.

Plaintiffs respectfully request that the Court grant Plaintiffs' motion and preliminarily enjoin OJP's terminations of Plaintiffs' grants.

BACKGROUND

I. Factual Background

In April 2025, the Department of Justice's Office of Justice Programs abruptly and summarily terminated an estimated 373 multi-year grants—worth more than approximately $820 million dollars over the grant period. Compl. ¶ 1. With no prior notice, OJP sent a form email to Plaintiffs and other grantees, offering the same unsupported explanation that "awards no longer effectuate[] the program goals or agency priorities." Compl. ¶ 2. OJP ordered the grantees to stop work immediately and informed them that they would be reimbursed only up to the date of the termination letter. *Id.*

The terminated grants cut across a broad swath of critical programs that have a successful track record of making our communities safer. These include grants addressing violence reduction and intervention, policing and prosecution, victims' services, juvenile justice and child protection, substance use and mental health treatment, corrections and reentry, justice system enhancements, research and evaluation, and other state- and local-level public safety functions. *Id.* at ¶ 3.

A. Plaintiffs' Missions

i. Children and Youth Justice Center d/b/a Center for Children & Youth Justice (CCYJ)

The Center for Children & Youth Justice (CCYJ), based in Washington State, was founded in 2006 by Washington State Supreme Court Justice Bobbe J. Bridge (ret.). Ex. A, Declaration of Rachel Sottile ¶ 5. CCYJ's mission is to create better lives for generations of children and youth by reforming the child welfare and juvenile justice systems. *Id.* As the only organization solely committed to reforming these systems in Washington State, CCYJ's approach is rooted in listening to those most impacted—children, young adults, and families—by failures of these systems, leading to the development, coordination, and implementation of reforms designed to support children and youth, stabilize families, and strengthen communities. *Id.*

ii. Stop AAPI Hate

Stop AAPI Hate is a U.S.-based non-partisan civil rights coalition dedicated to ending racism and discrimination against Asian Americans and Pacific Islanders (AAPIs). Ex. B, Declaration of Cynthia Choi ¶ 5. Stop AAPI Hate was founded in March 2020, in response to the alarming increase in acts of hate against the AAPI community during the COVID-19 pandemic, by three 501(c)(3) organizations: Chinese for Affirmative Action (CAA), AAPI Equity Alliance, and San Francisco State University (Asian American Studies Department), with CAA as the lead fiscal agency. *Id.* Since its founding, Stop AAPI Hate has become the nation's largest reporting center for tracking anti-AAPI hate acts and provides critical support to victims of hate around the country. Choi Decl. ¶ 6.

iii. FORCE (Faithfully Organizing for Community Empowerment) Detroit

FORCE (Faithfully Organizing for Community Empowerment) Detroit is a community violence intervention (CVI) organization dedicated to building a safer, freer Detroit, Michigan. Ex. C, Declaration of Dujuan Kennedy ¶ 3. Founded in 2015, FORCE Detroit works to steward, incubate, and provide financial support to grassroots organizations and activists committed to alternatives to community safety that minimize criminalization. *Id.* As part of this work, FORCE Detroit's approach includes three core components: direct services to people impacted by violence,

advocacy and public education, and training and technical assistance for emerging CVI leaders. Kennedy Decl. ¶ 4.

iv. Health Resources in Action (HRiA)

Health Resources in Action (HRiA) is a Massachusetts-based non-profit organization with a national footprint working to improve and reimagine public health. Ex. D, Declaration of Steven Ridini ¶ 5. HRiA works towards its vision of healthy people thriving in equitable and just communities. *Id.* With more than 300 staff members across the country, HRiA partners with individuals, organizations, and communities to transform the practices, policies, and systems that improve health and advance racial equity. *Id.* For over two decades, HRiA has worked in communities across the country to plan and launch CVI strategies that cultivate and strengthen a comprehensive and collaborative CVI ecosystem. *Id.*

v. Vera Institute of Justice (Vera)

Vera Institute of Justice (Vera) is a New York-based non-profit with a national footprint. Ex. E, Declaration of Nicholas Turner ¶ 4. Founded in 1961, Vera is the oldest and among the largest organizations in the country working to advance safety and justice. *Id.* For over sixty years, Vera has worked in partnership with community and government leaders—including in law enforcement and corrections facilities—to address some of the most intractable problems in the criminal justice system. *Id.* Vera's mission is to pilot, test, and scale innovations that prevent crime and address its drivers, increase accountability, and rely less on incarceration and more on the programs and services that help individuals, families, and communities to thrive. *Id.*

B. OJP Unlawfully Terminates Plaintiffs' Grants and Cooperative Agreements

On April 4, 2025, Plaintiff Vera Institute of Justice received an email from OJP immediately terminating five grants, totaling more than $7 million, that it held with the federal government. Turner Decl. ¶¶ 8-9. On April 22, 2025, Plaintiffs Stop AAPI Hate, CCYJ, Force Detroit, and HRiA, received identical emails from OJP immediately terminating their grant funding, totaling more than 18.5 million dollars. Choi Decl. ¶¶ 13, 19; Sottile Decl. ¶¶ 9-11; Kennedy Decl. ¶ 9; Ridini Decl. ¶¶ 11-12. These

emails included the following boilerplate "explanation" as to why the grants were being immediately terminated:

> These awards are being terminated because they "no longer effectuate[] the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. These awards demonstrate that they no longer effectuate Department priorities.

Compl. ¶ 44.

No Plaintiffs have ever had a federal grant terminated, Compl. ¶ 45, and some Plaintiffs, like Vera and HRiA have been recipients of grant funding for decades under both Democratic and Republican administrations. Turner Decl. ¶ 7; Ridini Decl. ¶ 17. Indeed, to Plaintiffs' knowledge, OJP has never previously terminated grants because of a "change in agency priority," and prior to April, termination of OJP grants was exceedingly rare. Compl. ¶ 46.

C. OJP's Termination of Plaintiffs' Funds is Causing Plaintiffs and Those They Serve Significant and Irreparable Harm.

Plaintiffs are non-profit organizations that serve thousands of individuals, law enforcement, prosecutors, cities, and states across the country through federal grant funding. They work to train and assist law enforcement, correctional facilities staff, prosecutors, and states and localities. They work with vulnerable populations who have been victims of crime, including Deaf and disabled victims of crime, and individuals with disabilities who are victims of sex or labor trafficking. They fund and work at the community level to successfully interrupt gun crime for juveniles and adults, including those at the highest risk for gun violence, in cities across the country. They fund and work in hospitals to provide lifesaving assistance for violently injured victims and their families, while also mitigating retaliation that may arise from the situation. As a direct result of OJP's unlawful termination of these grants, services to many of these populations have abruptly ceased.

OJP's abrupt and unlawful termination of Plaintiffs' grants had an immediate and irreparable impact on Plaintiff organizations, their staff, and the individuals and communities that they serve.

These terminations have led to an abrupt discontinuation of vital services to some of the most vulnerable in our communities, making individuals and the communities in which they live less safe.

Plaintiffs have built multi-year programs to carry out projects and provide critical services, and Plaintiffs reasonably expected to receive grant funding for the remainder of their grant terms. With grant funding abruptly terminated, Plaintiffs will not be able to find alternate funding to sustain many of their projects, and most Plaintiffs have already been forced to lay off staff. As a direct result of OJP's illegal terminations, individuals, victims of crime, law enforcement officers, correctional facilities, cities, and states will lose access to critical programs and services that have a successful track record in making our communities and prisons safer. In some cases, the abrupt termination of those services will result in preventable deaths. Absent a preliminary injunction, Plaintiffs will suffer irreparable harm—multi-year projects will terminate abruptly, specialized staff will be laid off, critical services will be withdrawn from communities facing some of the gravest safety concerns—all compounded by lasting damage to hard-earned reputational trust.

i. OJP's terminations are causing substantial harms to Plaintiffs' programs, limiting life-saving services, and making communities less safe.

OJP's abrupt termination of grant funding is causing substantial harms to each of Plaintiffs' programs funded by the terminated grants. All Plaintiffs have been forced to eliminate or severely restrict essential services provided under the grant. And although some Plaintiffs have been able to reallocate funds from other projects to keep vital services afloat, these scarce funds must be taken from other important priorities and services. Many Plaintiffs have entered into multi-year subcontract awards with other organizations, correctional facilities, and cities worth millions of dollars, leaving those partners without the resources for programs that they have spent significant time planning for and implementing. These terminations have devastated Plaintiffs' ability to maintain programming, attract and retain qualified staff, or expand life-saving interventions urgently needed by the communities that they serve.

HRiA. As a direct result of the termination of HRiA's grant funding, HRiA is no longer able to provide critical technical assistance to 23 hospital-based violence intervention programs, which

disrupts life-saving services and "in some cases, members in the community will lose their lives because of the disruption of services." Ridini Decl. ¶¶ 25, 18a. Numerous hospitals now lack assistance for their violence prevention professionals who provide invaluable support to victims and their families and mitigate retaliation from victims of gun violence when they leave the hospital. *Id.* at ¶ 18b. These programs allowed the medical staff to care for their patients while the program-funded staff manage the aftermath and safety risks. *Id.* at ¶ 33. Similarly, many of HRiA's subrecipients of grant funding are often the sole source of CVI work in their communities, and many have been forced to reduce or completely halt their work, which has had a devastating impact on the communities who rely on these organizations, including youth that are served by four out of five of the subrecipients. *Id.* at ¶¶ 18b–c, 42. At the individual level, this has left those at the highest risk for gun violence unsupported and susceptible to the environment they are in; people who were mid-transformation can lose momentum or backslide; and, people who were connecting with frontline workers may be more difficult to reach with gaps in services and supports. *Id.* at ¶ 27. This has resulted in immediate harm in neighborhoods that now lack grant-funded staff who are able to immediately intervene in active conflicts and retaliations, or to respond to flare ups in violence. *Id.* And at least 250 government, health care and philanthropy leaders, and frontline workers could lose the opportunity to attend HRiA's annual conference and learn best practices to respond to community violence because the grant funding supporting those individuals was terminated. *Id.* at ¶ 18e.

Vera. As a direct result of OJP's termination of Vera's grant awards, Deaf and hard-of-hearing victims of crimes lost access to free sign language interpretation services to allow those victims to communicate with law enforcement and victim services. Turner Decl. ¶¶ 15a, 19–23. This program has served more than 4,000 individuals, and Vera has been forced to turn away individuals who needed access to these essential services. *Id.* at ¶ 22. Vera also has no ability to further support the 872 victim services participants who completed language access training, nor can it support the 119 people who received one-on-one technical assistance on how to provide language access in their organizations for Deaf victims of crime. *Id.* Similarly, the needs of human trafficking survivors with disabilities will go

unmet after Vera was forced to abruptly cancel a training for 486 individuals (more than half of them in law enforcement) and dozens of law enforcement agencies to help law enforcement identify and serve the unique needs of this population and lessens law enforcement's ability. *Id.* at ¶ 48. The cities of Richmond, California, and Albuquerque, New Mexico, have lost more than $700,000 in subaward funding to modernize each city's 911 call systems and train civilian specialists to respond to mental and behavioral health crises and to prevent and intervene in violent crime, especially gun-related homicides and shootings. *Id.* at ¶ 25–30. Prosecutors in Arizona, Colorado, Massachusetts, North Carolina, and Virginia can no longer benefit from Vera's expanding diversion programs, which were designed to help prosecutors address the underlying drivers of criminal conduct in their communities and instead focus on prosecuting the most violent crime plaguing a community. *Id.* at ¶ 32–36. Because of the termination of Vera's grant funding, two state Department of Correction facilities withdrew from Vera's project to support data collection, policy development, training and monitoring for correctional facilities to increase safety in prisons. *Id.* at ¶¶ 42, 38–44.

FORCE Detroit. As a direct result of OJP's termination of its grant funding, FORCE Detroit has seen immediate breakdowns in a care ecosystem it painstakingly built, including crumbling of the backbone of its violence intervention work, which included daily, in-the-field support for 14-24 young adults who are most at risk of gun violence. Kennedy Decl. ¶ 16–19. The program funded by this grant has reduced fatal and non-fatal shootings, enhanced opportunities for violence-impacted people to secure employment or start small businesses, and provided critical communal support including showing up at funerals and coaching individuals through job interviews. *Id.* at ¶ 8. The termination of these grants has eliminated the resources needed to maintain a consistent presence in communities most impacted by violence and weakens the infrastructure it built to interrupt cycles of harm, with no viable replacement in sight. For FORCE Detroit, these terminations "abruptly removed trusted support systems for individuals at the highest risk of involvement in violence," including individuals who relied on them for "safety planning, relocation assistance, employment support, or therapy referrals." *Id.* at ¶ 20. This includes individuals like Carol, a single mother and dedicated nurse: "after

offering temporary shelter to a friend, Carol and her children became targets of escalating violence, culminating in the tragic shooting of her stepdaughter." *Id.* at ¶ 26. FORCE Detroit was able to assist Carol by covering her move-in expenses, facilitating her access to therapy services, and ultimately helping Carol and her family heal from the unimaginable tragedy they faced. *Id.* But without the terminated grant funds, FORCE Detroit "cannot sustain or continue providing crucial assistance to victims of violence in Detroit, as it did for Carol." *Id.* Moreover, FORCE Detroit cannot sustain long-term programming, attract and retain qualified staff, or expand life-saving interventions that its communities urgently need. *Id.* at ¶¶ 14d, 15.

Stop AAPI Hate. As a direct result of OJP's terminations of its grant funding, at least 40 victims of hate crimes will lose the opportunity to participate in Stop AAPI Hate's healing support programs. Choi Decl. ¶¶ 22b, 40. Stop AAPI hate will no longer be able to substantially assist communities who are dealing with the aftermath of large-scale incidents of hate and violence (like mass shootings), despite having played a critical role past incidents. *Id.* at 32–27. The organization has had to terminate: planned partnerships within the community to care and provide services for victims of hate crimes; policy and advocacy work promoting safer public transit systems; and renowned data collection and research on anti-AAPI hate and violence that has become a critical platform for victims and resource for policy makers, nationwide. Choi Decl. ¶¶ 22, 47, 54.

CCYJ. As a direct result of OJP's terminations, CCYJ has had to end a program that provided support to organizations implementing CVI strategies within their communities. Sottile Decl. ¶¶ 15a, 32–33. CCYJ also had to reduce funding for a critical program in King County, Washington, which annually serves an estimated 200 youth who are involved with, or at risk of involvement with, gangs and violence. *Id.* at ¶¶ 15, 21. As a result of OJP's grant termination, as many as 65 young people may no longer be able to access these services, including 13- to 24-year-olds who CCYJ knows are carrying guns or other weapons or self-identify as being in a gang. *Id.* at ¶ 26.

ii. OJP's terminations have caused Plaintiffs to lay off staff, have imperiled future financial stability, and have caused deep reputational injuries.

As a result of OJP's terminations, Plaintiffs have been forced to make or plan for staffing cuts. Some plaintiffs have already laid off employees in critical positions. Kennedy Decl. ¶ 18; Sottile Decl. ¶ 15a; Choi Decl. ¶ 22b. Three frontline FORCE Detroit employees, with significant expertise, meaningful ties to the community, and trusted relationships with high-risk program participants, were laid off; losing those roles meant losing critical functions like intake coordination, trauma support, community-based data collection, and losing those individuals who have built trust with some of the highest risk individuals in their communities. Kennedy Decl. ¶ 14b. Other Plaintiffs have had to diminish employee hours, which has limited Plaintiffs' ability to carry out their critical missions and violence intervention work. Turner Decl. ¶¶ 15f, 34; Sottile Decl. ¶ 15a; Ridini Decl. ¶ 18c-d; Choi Decl. ¶¶ 38-39. Other Plaintiffs, like HRiA, who funded staff salaries through the terminated grants, will face layoffs of up to 31 specialized staff members. Ridini Decl. ¶ 21. Stop AAPI Hate would have to layoff 20% of its employees within a year. Choi Decl. ¶ 22b. Moreover, the loss of these jobs has an outsized impact on the community-violence intervention community because, for many frontline workers, the income from these programs "are a vital source of economic stability," and benefits. Ridini Decl. ¶ 22. These "frontline workers prevent violence and save lives every day," and these terminations deeply undermine and, in some cases, completely eliminate their ability to do so. *Id.*

Additionally, OJP's sudden, unexplained termination of these grants have dealt a severe blow to reputations that Plaintiffs have painstakingly built over years in their communities. Choi Decl. ¶ 57-58; Ridini Decl. ¶¶ 20, 42; Kennedy Decl. ¶¶ 14b, 20–22. To take just one example, FORCE Detroit had to "inform a licensed trauma counselor who cleared space in their practice specifically for our participants that FORCE Detroit's funding had been terminated. Now that counselor faces a financial shortfall and a waiting list of participants they are unable help." Kennedy Decl. ¶ 22.

II. Regulatory Background

Detailed regulations govern DOJ's administration of federal grant funding, including those grants administered by OJP, and specify the grounds on which such grants may be terminated. These regulations stem from Office of Management and Budget (OMB) Uniform Guidance for Federal Financial Assistance, codified at 2 C.F.R. part 200, which OMB promulgated pursuant to its authority to "establish government wide financial management policies for executive agencies," 31 U.S.C. §§ 503(a), 504. The OMB Uniform Guidance generally requires federal agencies to "implement" OMB's guidance "in codified regulations." 2 C.F.R. § 200.106. DOJ has followed that instruction by issuing its own regulation adopting the OMB Uniform Guidance. 2 C.F.R. § 2800.101.

Under these regulations specific to grant termination, OJP may terminate grants only under certain circumstances and pursuant to specific procedures. The regulations do not provide unfettered discretion for OJP to terminate grants; they instead allow for the termination of grants in three circumstances: (1) "if the recipient or subrecipient fails to comply with the terms and conditions of the Federal award"; (2) "with the consent of the recipient or subrecipient, in which case the two parties must agree upon the termination conditions"; and (3) "pursuant to the terms and conditions of the Federal award, including, to the extent authorized by law, if an award no longer effectuates the program goals or agency priorities." *Id.* § 200.340(a).

Under Section 200.340, terminating a grant because of agency priorities is a permissible basis for terminating a grant only if the terms and conditions of the award specify that as a ground for termination. Amendments to the Uniform Guidance that OMB adopted in April 2024 which apply to terminations after October 1, 2024, make this clear. *See* Guidance for Federal Financial Assistance, 89 Fed. Reg. 30046 (Apr. 22, 2024) (hereinafter "2024 OMB Guidance"); *see also* U.S. Dep't of Justice, DOJ Grants Financial Guide, https://perma.cc/TT35-JMSF (last updated Oct. 2024). Prior to those amendments, the guidance stated that an agency could terminate an award if it "no longer effectuates the program goals or agency priorities," without specifying that this ground for termination had to be stated in the award's terms and conditions. *See* Guidance for Grants and Agreements, 85 Fed. Reg.

49506, 49559 (Aug. 13, 2020) (hereinafter "2020 OMB Guidance"). To increase transparency for award recipients, OMB revised the guidance to make clear that an agency could terminate a grant for failure to effectuate "program goals or agency priorities" only if the terms and conditions of the award so provide. 2024 OMB Guidance at 30089 (stating that terminations based on agency priorities were still permitted "[p]rovided that the language is included in the terms and condition of the award"). As OMB explained, this ensures that agencies "clearly and unambiguously communicate termination conditions in the terms and conditions of the award." 2 C.F.R. §200.340(b). Indeed, even before that most recent amendment, the Uniform Guidance already required grantor agencies to "clearly and unambiguously specify all termination provisions in the terms and conditions of the Federal award." *Id.*; *see also* 2020 OMB Guidance at 49560.

None of the conditions in Plaintiffs' terminated awards provide that the award could be terminated based on a grant's failure to effectuate agency priorities.

LEGAL STANDARD

"A plaintiff seeking a preliminary injunction must establish that [it] is likely to succeed on the merits, that [it] is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in [its] favor, and that an injunction is in the public interest." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008). Courts in this Circuit apply a "sliding scale" approach, wherein "a strong showing on one factor could make up for a weaker showing on another." *Changji Esquel Textile Co. v. Raimondo*, 40 F.4th 716, 726 (D.C. Cir. 2022) (internal quotation marks omitted); *Nat'l R.R. Passenger Corp. (Amtrak) v. Sublease Int. Obtained Pursuant to an Assignment and Assumption of Leasehold Int. Made as of Jan. 25, 2007*, No. 1:22-cv-01043, 2024 WL 3443596, at *1 (D.D.C. July 15, 2024) (recognizing that district courts remain bound by sliding-scale precedent).

In this case, the Court has the authority to issue injunctions under Federal Rule of Civil Procedure 65, and under the APA, the Court "may 'issue all necessary and appropriate process to preserve status or rights pending conclusion of the review proceedings' when doing so is 'necessary to prevent irreparable injury.'" *Nat'l Council of Nonprofits v. OMB*, No. 1:25-cv-00239, 2025 WL 597959,

at *11 (D.D.C. Feb. 25, 2025) (quoting 5 U.S.C. § 705) (alteration omitted). Thus, "[b]oth provisions [Fed. R. Civ. P. 65 and § 705] provide a mechanism for issuing injunctive relief and operate under the same four-factor test." *Id.*

ARGUMENT

I. Plaintiffs Are Likely to Succeed on the Merits

Plaintiffs are likely to succeed on the merits. OJP's terminations violate the APA because they are contrary to law, contrary to DOJ's regulations, and arbitrary and capricious. These terminations also violate multiple constitutional provisions, including the Fifth Amendment Due Process Clause and the Spending and Appropriations Clauses, and the Take Care Clause.

A. OJP's *En Masse* Grant Terminations Violate the Administrative Procedure Act.

OJP's termination of approximately 373 grants awards totaling more than $800 million, with no notice and no reasoned explanation about why the grants were being terminated, is quintessential unlawful agency action that violates the APA. These terminations violate the Constitution, agency regulations, exceed OJP's lawful authority, and are arbitrary and capricious. *See* 5 U.S.C. § 706(2)(A)–(C). Because Plaintiffs are likely to succeed on the merits of their APA claim, Defendants' grant terminations must be set aside under 5 U.S.C. § 706(2).

iii. OJP's termination of Plaintiffs' grants is final agency action.

OJP's *en masse* termination of Plaintiffs' grant awards constitutes final agency action and is subject to review under the APA. 5 U.S.C. § 704. Agency action is final if it "mark[s] the 'consummation' of the agency's decisionmaking process," meaning that it is not "tentative" or "interlocutory," and determines "rights or obligations" or imposes "legal consequences." *Bennett v. Spear*, 520 U.S. 154, 177–78 (1997) (citations omitted). OJP's terminations of Plaintiffs' grants "mark[] the consummation" of OJP's decision-making process because they constitute a final decision by the agency terminating Plaintiffs' grants effective immediately. This decision resulted in the immediate loss of funding to Plaintiffs. *See, e.g.*, *Nat'l Council of Nonprofits*, 2025 WL 597959, at *13 (holding that pause on funding constituted final agency action); *see also RFE/RL, Inc. v. Lake*, No. 1:25-cv-00799,

2025 WL 900481, at *3 (D.D.C. Mar. 25, 2025) (grant termination is "'final' agency action given the unambiguous language of the grant termination letter."). Moreover, these terminations impose "legal consequences" by requiring Plaintiffs to undertake closeout obligations, with the threat of enforcement actions if Plaintiffs fail to do so. Sottile Decl., Exs. 2, 4, 6; Choi Decl., Ex. 2; Kennedy Decl., Ex. 2; Ridini Decl., Exs. 2, 4, 6; Turner Decl., Ex. 6. *Woonasquatucket River Watershed Council v. USDA*, No. 1:25-cv-00097, 2025 WL 1116157, at *15 (D.R.I. Apr. 15, 2025) ("'[L]egal consequences" surely flow, given that grant recipients cannot access previously awarded funds.").

iv. OJP's terminations of Plaintiffs' grants are contrary to law.

Plaintiffs are likely to succeed on their claim that OJP's terminations of Plaintiffs' grants were "not in accordance with law," 5 U.S.C. § 706(2)(A). An agency is "bound by its own regulations," *Nat'l Env't Dev. Assoc.'s Clean Air Project v. EPA*, 752 F.3d 999, 1009 (D.C. Cir. 2014) (internal quotation marks omitted), and an agency's failure to follow them is "contrary to the law," *Fuller v. Winter*, 538 F. Supp. 2d 179, 191 (D.D.C. 2008). As relevant here, 2 C.F.R. § 200.340(a), as adopted by DOJ at 2 C.F.R. § 2800.101, sets forth the limited circumstances in which OJP may terminate a grant and the requirements for doing so.

OJP invoked 2 C.F.R. § 200.340(a)(4) as the basis for terminating Plaintiffs' grants. Under that provision, an award may be terminated only "pursuant to the *terms and conditions of the Federal award*, including, to the extent authorized by law, if an award no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). OJP's termination of Plaintiffs' grants based on Section 200.340(a)(4) is contrary to both text and regulatory history of that provision. *First*, OJP did not provide clear and unambiguous notice that it could terminate awards based on a failure to effectuate agency priorities, as is required. *Second*, Section 200.340(a)(4) does not allow OJP to terminate a grant based on a "change" in agency priorities. OJP's terminations of these grants is therefore contrary to law.

a. Regulatory history of 200.340

Both current and former versions of the OMB regulations allowed an agency to terminate a grant if the grant "no longer accomplished the purpose for which the Federal award was made." 2 C.F.R. § 200.340(a)(3).[2] Under the previous Trump administration, in 2020, OMB added a provision authorizing termination "if an award no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(2) (2020) (authorizing termination "to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities"). Section 200.340(b) also required that the agency must "clearly and unambiguously specify all termination provisions in the terms and conditions of the Federal award." *Id.* § 200.340(b); *see also* 2020 OMB Guidance at 49560. To "provide greater clarity on the policy for termination of awards," in 2024 OMB revised Section 200.340 to make clear that an agency could terminate a grant for failure to effectuate "program goals or agency priorities" only if specifically included in the terms and conditions of the award. 2024 OMB Guidance at 30089 (stating that terminations based on agency priorities would be permissible only if "the language is included in the terms and condition of the award"). As OMB explained, this amendment to Section 200.340 requires that agencies "clearly and unambiguously communicate termination conditions in the terms and conditions of the award." *Id.* Thus, as revised, if OJP wished to rely on Section 200.340(a)(4) as the basis for termination, OJP must have included a "clear and unambiguous" term and condition providing for termination where an award no longer effectuated the program goals or agency priorities. No such term or condition was included in any of Plaintiffs' awards. Sottile Decl.; Choi Decl.; Kennedy Decl.; Ridini Decl.; Turner Decl.

b. OJP did not provide clear and unambiguous notice that it could terminate awards based on a failure to effectuate agency priorities.

OJP stated in Plaintiffs' termination notices that the "award documents provide notice of the applicability of the termination provisions in § 200.340," but Plaintiffs' award documents do not contain that language. Compl. ¶ 46. Nowhere in the award documents does OJP "clearly and

[2] That provision was issued for the first time in substantially similar form in 2013. *See* Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 78 Fed. Reg. 78590, 78590-01 (Dec. 26, 2013).

unambiguously" state that it could terminate the award because an award no longer effectuates program goals or agency priorities. To the contrary, the award documents include a number of different conditions that, if violated, could result in termination of the award, including for example prohibited conduct related to trafficking victims and a failure to comply with the terms of the award. Without a clear and unambiguous articulation of the agency's priorities in the award and notice that the grant can be terminated if the grantee's award no longer effectuated such priorities, OJP was not permitted to terminate the grants on the basis of "agency priorities." OJP's termination of Plaintiffs' grants on that basis is therefore contrary to DOJ's regulations.

c. Section 200.340(a)(4) does not allow OJP to terminate a grant based on a "change" in agency priorities.

OJP's terminations are contrary to law for an additional and independent reason. Section 200.340(a)(4) allows OJP to terminate a grant if "*an award* no longer effectuates the program goals or agency priorities." Thus, OJP can rely on this provision only if the grantee's *individual award* no longer satisfies the agency's priorities as they were articulated when the grant was awarded. The language of Section 200.340(a)(4) does not refer to any "change" in agency priorities as a basis for termination. The most natural reading of that language, in context, is that it allows for terminations because of failures stemming from the grant recipient—*i.e.*, where the recipient can no longer effectuate the goals and priorities that motivated the award in the first place. OJP's interpretation that "agency priorities" includes agency priorities identified after the grant is awarded would render OMB and DOJ regulations regarding terminations meaningless, and it would give OJP and any other executive branch agency the ability to terminate any grant award by simply invoking a change in agency priorities.

Not only is OJP's interpretation contrary to the text of Section 200.340(a)(4), but it is also unsupported by OMB's Final Rule in 2020. OMB's explanation of the 2020 revision to the Uniform Guidance makes clear that an agency must rely on specific evidence to demonstrate that "an award" no longer serves a program goal or agency priorities that are articulated when the award was made. OMB provides two examples in which it would be appropriate to terminate an award under this provision: "[I]f additional evidence reveals that a specific award objective is ineffective at achieving

program goals, it may be in the government's interest to terminate the Federal award." 2020 OMB Guidance at 49507. The second example given is where "additional evidence may cause the Federal awarding agency to significantly question the feasibility of the intended objective of the award, such that it may be in the interest of the government to terminate the Federal award." *Id.* at 49507–08. Both examples are specific to the effectiveness or objective of the award, not to a change in program goals or agency priorities. There would be no need for "additional evidence" if an agency could simply change its priorities and cancel all grants deemed out of step with those new priorities.

To interpret Section 200.340(a)(4) in a manner that allows an agency to sweep aside millions or billions of dollars in grants based solely on a post-hoc change in agency priorities would raise a host of constitutional issues, *see* infra at II, would fail to provide grantees with notice of the conditions that would trigger a termination of their grant, and would render the provision so vague as to permit the arbitrary exercise of power. But OMB was clear that one of the purposes of Section 200.340 was to ensure that "agencies are not able to terminate grants arbitrarily," *id.* at 49509, to guard against the very sort of mass, arbitrary, and ultimately unlawful grant terminations that OJP has attempted to carry out in this case.

v. OJP's terminations are contrary to a constitutional right.

The APA prohibits agency action that is "contrary to constitutional right, power, privilege, or immunity." 5 U.S.C. § 706(2)(A)–(C). As applied to Plaintiff class, OJP's terminations raise a host of constitutional violations, including a violation the Fifth Amendment; and a violation of the Separation of Powers, Spending and Appropriations Clauses, and the Take Care Clause. *See infra* at II. Plaintiffs are thus likely to succeed on their claim OJP's unconstitutional terminations also violate the APA.

vi. OJP's terminations of Plaintiffs' grants are arbitrary, capricious, and an abuse of agency discretion.

Plaintiffs are also likely to succeed on their claim that OJP's simultaneous, unreasoned terminations of Plaintiffs' grants are arbitrary and capricious. Under the APA, a court must "hold unlawful and set aside agency action" that is "arbitrary, capricious, an abuse of discretion, or otherwise

not in accordance with law." 5 U.S.C. § 706(2)(A). Under the APA, grantees are entitled to reasoned decisionmaking before the government terminates millions of dollars in vital grant funding with no notice. OJP's *en masse* termination of an estimated 373 grants, on the same day, using the same cursory and unspecific rationale, represents nearly every hallmark of arbitrary and capricious agency action.

OJP's terminations are also arbitrary and capricious because the terminations are "not reasonable" nor "reasonably explained." *Ohio v. EPA*, 603 U.S. 279, 292 (2024) (quoting *FCC v. Prometheus Radio Project*, 592 U.S. 414, 423 (2021). When terminating a grant, OJP is required under the APA to "examine the relevant data and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made." *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.,* 463 U.S. 29, 43 (1983). OJP's explanation cannot rely "on factors which Congress has not intended it to consider, entirely fail[] to consider an important aspect of the problem, offer[] an explanation for its decision that runs counter to the evidence before the agency, or [be] so implausible that it could not be ascribed to a difference in view or the product of agency expertise." *Id.* at 43. OJP's terminations are judged "only upon the grounds on which the agency acted," when it made the challenged decision, not based on post hoc rationalizations. *Michigan v. EPA*, 576 U.S. 743, 760 (2015).

OJP's mass termination of Plaintiffs' grants fails nearly all of these benchmarks of reasoned decisionmaking under the APA. The emails included identical language and stated summarily, without analysis or individualized assessment as to each grant, that OJP determined that the awards "no longer effectuate[] the program goals and the Department's priorities." The form email sent to all named Plaintiffs included this three-sentence "explanation" as to why OJP was suddenly terminating Plaintiffs' grants effective immediately:

> These awards are being terminated because they "no longer effectuate[] the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of

> government. These awards demonstrate that they no longer effectuate Department priorities.

OJP's terse, three-sentence rationale that the awards are being terminated because they no longer effectuate agency priorities "can scarcely be characterized as an explanation." *RFE/RL, Inc.*, 2025 WL 900481, at *3. When terminating a grant, an agency must provide recipients with a "workable, sensible, or meaningful reason or basis for the termination of their awards." *Am. Ass'n of Colls. for Tchr. Educ. v. McMahon*, No. 1:25-cv-00702, 2025 WL 833917, at *21 (D. Md. Mar. 17, 2025). OJP did not do so.

To begin, none of the termination notices include any discussion specific to the grantee; nor does any notice explain why the grant no longer serves the agency's priorities, as is required by DOJ's regulations. Rather, OJP's email merely states that it wishes to "more directly" focus its funding and then asserts in a conclusory fashion that "these awards demonstrate that they no longer effectuate Department priorities." OJP's explanation certainly does not provide a "workable, sensible, or meaningful basis for the termination" of the awards that would allow Plaintiffs to ascertain what elements of their program suddenly no longer support the priorities articulated in the termination email. Nor does OJP explain how the "awards demonstrate" that they no longer effectuate Department priorities. OJP's boilerplate explanation does not satisfy the sort of individualized, award-by-award analysis that relies on specific evidence to demonstrate that an award no longer serves a program goal or agency priorities. *See also Pol'y & Rsch., LLC v. HHS*, 313 F. Supp. 3d 62, 72 (D.D.C. 2018) (Jackson, J.) ("It is also clear beyond cavil that an agency acts arbitrarily and capriciously if it acts in a manner that is contrary to its own regulations or a congressional statute").

Indeed, another court in this district recently found a similar "conclusory" reference to "agency priorities," "unsupported by any facts or reasoning," to be arbitrary and capricious. *RFE/RL, Inc.*, 2025 WL 900481, at *3 (concluding that "one line" explanation in grant termination letter "stating that 'the award no longer effectuates agency priorities'" was "not a 'satisfactory explanation' and offers no 'rational connection between the facts found and the choices made'"). At bottom, OJP's boilerplate assertion that Plaintiffs' grants are no longer consistent with agency priorities "is so broad

and vague as to be . . . devoid of import," *Am. Ass'n of Colls. for Tchr. Educ.*, 2025 WL 833917, at *21, and "can scarcely be characterized as an explanation," much less one that comports with the APA's requirement of reasoned decisionmaking. *RFE/RL, Inc.*, 2025 WL 900481, at *3. As a result, OJP's terminations are arbitrary and capricious.

Compounding the arbitrary and capricious violation, OJP's assertion that it could terminate a grant because of a change in agency priorities constitutes an unexplained and unreasonable change in longstanding principles regarding the interpretation of Section 200.340. "When an agency changes course," as OJP did here in asserting a sudden change in agency priorities, it must "consider the serious reliance interests" of stakeholders. *DHS v. Regents of the Univ. of Cal.,* 591 U.S. 1, 30 (2020) (internal quotation marks and citations omitted). OJP "must be cognizant that longstanding policies may have engendered serious reliance interests that must be taken into account." *Id.*; *cf. Michigan*, 576 U.S. at 753 ("[R]easonable regulation ordinarily requires paying attention to the advantages and the disadvantages of agency decisions."). "It would be arbitrary and capricious to ignore such matters." *Id.* Additionally, OJP must "consider responsible alternatives to its chosen policy and to give a reasoned explanation for its rejection of such alternatives." *Spirit Airlines, Inc. v. Dep't of Transp.*, 997 F.3d 1247, 1255 (D.C. Cir. 2021) (internal quotation marks omitted). "This principle goes to the heart of reasoned decisionmaking." *Id.*

All Plaintiffs relied on their understanding that OJP would fulfill its commitments and would not arbitrarily and unlawfully terminate their grant funding. Sottile Decl. ¶ 16; Choi Decl. ¶ 23; Kennedy Decl. ¶ 15; Ridini Decl. ¶ 19; Turner Decl. ¶ 16. They hired employees, developed relationships with community organizations and residents who depend on grant-enabled services, and entered into contracts with vendors. Some plaintiffs entered into multi-year subcontract awards with other organizations, correctional facilities, and cities worth millions of dollars, only to have to abruptly terminate those awards. Ridini Decl. ¶¶ 19, 52; Turner Decl. ¶¶ 15d, 27.

OJP did not mention, much less discuss, the grantees' reliance interests or the impact on their organizations in the termination emails. In so doing, OJP failed to "display [any] awareness that [they

are] changing position[s]," and certainly did not articulate "good reasons" for the shift. *Encino Motorcars, LLC v. Navarro*, 579 U.S. 211, 221 (2016) (quotation marks omitted); *Fox Television Stations, Inc.*, 556 U.S. at 515–16 (when an agency departs from a prior policy, it ordinarily must "display awareness that it is changing position" and offer "a reasoned explanation" for doing so, particularly where regulated parties have relied on the old rule). In doing so, OJP failed to consider the substantial reliance interests of Plaintiffs. That failure is arbitrary and capricious and further indicates that OJP "entirely failed to consider an important aspect of the problem" in terminating the grants, namely, Plaintiffs' serious reliance interests and the devastating impacts from the sudden and unexplained termination of funding. *State Farm*, 463 U.S. at 43.

Because OJP failed to engage in reasoned decisionmaking when it terminated Plaintiffs' grants, Plaintiffs are likely to succeed on their APA claim that the terminations are arbitrary, capricious, and an abuse of agency discretion.

II. OJP's Terminations of Plaintiffs' Grants Violates the Constitution.

A. OJP's terminations of Plaintiffs' grants without notice violates their procedural due process rights.

The Fifth Amendment guarantees that "no person shall . . . be deprived of life, liberty, or property, without due process of law." U.S. Const. amend. V. This Clause protects "property" interests where a person or entity has a "legitimate claim of entitlement" to something. *Bd. of Regents of State Colls. v. Roth*, 408 U.S. 564, 577 (1972). A property interest may be created by "an independent source," such as other laws or regulations, "that secure certain benefits and that support claims of entitlement to those benefits." *Id.* Relevant here, this interest arises where governing law provides that the government may not terminate a benefit except for cause. *Esparraguera v. Dep't of the Army*, 101 F.4th 28, 33 (D.C. Cir. 2024) ("a property interest exists" where benefit could be terminated "only for cause").

It is established that federal grantees "have a legitimate property interest in federal funds that Congress has already appropriated and that the [grantees] have accepted." *Cnty. of Santa Clara v. Trump*, 275 F. Supp. 3d 1196, 1218 (N.D. Cal. 2017), *aff'd in part, vacated in part, remanded sub nom. City & Cnty.*

of San Francisco v. Trump, 897 F.3d 1225 (9th Cir. 2018); *see NB ex rel. Peacock v. District of Columbia*, 794 F.3d 31, 41 (D.C. Cir. 2015) (A person has a protected property interest if that "person would be entitled to receive the government benefit assuming she satisfied the preconditions to obtaining it" and "award of the benefit would follow from satisfaction of applicable eligibility criteria."); *Reeve Aleutian Airways, Inc. v. United States*, 982 F.2d 594, 598 (D.C. Cir. 1993) ("The government does not deny that some process is due because Reeve has a liberty interest in avoiding the damage to its reputation and business caused by a stigmatizing suspension."); *Com. Drapery Contractors, Inc. v. United States*, 133 F.3d 1, 6 (D.C. Cir. 1998) ("An agency may not impose even a temporary suspension without providing the "core requirements" of due process: adequate notice and a meaningful hearing."). "[I]f the statute or implementing regulations place substantive limitations on official discretion to withhold award of the benefit upon satisfaction of the eligibility criteria, there is a legitimate claim of entitlement, as to which the Due Process Clause affords protection." *NB ex rel. Peacock*, 794 F.3d at 41–42.

Such is the case with Plaintiffs' grant funding. Plaintiffs have a constitutionally protected property interest in the funding they applied for, were awarded, and currently rely on, including to pay staff and continue services that benefit millions of people nationwide. Some Plaintiffs have already been forced to furlough or lay off staff, Kennedy Decl. ¶ 14; Ridini Decl. ¶¶ 46, 51; Sottile Decl. ¶¶ 15, 17), and are cutting back essential services, harming relationships with their community beneficiaries–including those who depend on grantees for their physical safety. Kennedy Decl. ¶ 15-26; Ridini Decl. ¶¶ 18, 25; Sottile Decl. ¶¶ 15, 26. Some putative class members are at risk of shuttering entirely.[3] The substantive and reputational harms they have already experienced are not only irreparable but reflect the sort of legitimate property interest that the Due Process Clause protects.

Because Plaintiffs have a protected property interest in their grant funding, they were entitled to due process before OJP summarily terminated it without prior notice. Barring extraordinary circumstances, "the Constitution requires some kind of a hearing *before* the State deprives a person of

[3] Perry Stein et al., *DOJ Cancels grants for gun-violence and addiction prevention, victim advocacy*, Wall St. J. (Apr. 23, 2025), https://perma.cc/DG66-ZZCP.

liberty or property." *Zinermon v. Burch*, 494 U.S. 113, 127 (1990) (emphasis added); *Cleveland Bd. of Educ. v. Loudermill*, 470 U.S. 532, 542 (1985) ("[T]he root requirement of the Due Process Clause is that an individual be given an opportunity for a hearing before he is deprived of any significant protected interest.") (cleaned up); *United States v. James Daniel Good Real Prop.*, 510 U.S. 43, 62 (1993) (only in "extraordinary instances" may the government take real property without a pre-deprivation hearing).

Plaintiffs were clearly not afforded sufficient process before their grant funding was cut. As detailed above, their grants were summarily terminated without any prior notice whatsoever, much less a hearing or other opportunity to make their case for retention of funds. The termination letters assert that Plaintiffs no longer conduct work that "aligns with agency priorities," but did not explain why that was the case, and did not provide grantees with the opportunity to contest the basis for that termination. And while the termination letters afford terminated grantees a post-deprivation opportunity for an administrative appeal, that is insufficient because grantees' funds are not being reinstated during the pendency of any appeals. All the while, grantees' operations and reputations are being damaged with each passing day, proving that the risk of erroneous deprivation is not only high but already occurring.

On the other side of the ledger, OJP would not be harmed by affording Plaintiffs meaningful process before canceling their grants midstream. Indeed, the executive branch has no authority to unilaterally cancel these grants in the first place, so cannot be harmed by being forced to obey the law. *Northern Mariana Islands v. United States*, 686 F. Supp. 2d 7, 21 (D.D.C. 2009) ("[t]he public interest is served when administrative agencies comply with their obligations"). Nor could Defendants make any argument to the contrary: every American presidential administration before this one has afforded federal grantees meaningful process before terminating them and harming their beneficiaries.

B. OJP's Implementation of 2 CFR § 200.340(a)(4) to Terminate Plaintiffs' Grants is Void for Vagueness as Applied to Plaintiffs.

Defendants have also violated the Due Process Clause by terminating Plaintiffs' grants in an unconstitutionally vague manner. Government regulatory enforcement is void for vagueness if it (1) does not provide a person of ordinary intelligence fair notice of what is prohibited or (2) if it risks

arbitrary application. *Grayned v. City of Rockford*, 408 U.S. 104, 108–09 (1972); *FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253 (2012); *U.S. Telecom Ass'n v. FCC*, 825 F.3d 674, 734 (D.C. Cir. 2016); *Timpinaro v. SEC*, 2 F.3d 453, 460 (D.C. Cir. 1993). Open-ended regulatory terminology that allows for "wholly subjective judgments without statutory definitions, narrowing context, or settled legal meanings" violate due process in this way. *United States v. Williams*, 553 U.S. 285, 306 (2008); *Coates v. City of Cincinnati*, 402 U.S. 611, 611–14 (1971) (holding a regulation against "annoying" conduct unconstitutionally vague); *Smith v. Goguen*, 415 U.S. 566, 573–77 (1974) (holding a prohibition on treating the American flag "contemptuously" unconstitutionally vague).

Defendants' application of 2 C.F.R. § 200.340(a)(4) to Plaintiffs is unconstitutionally vague and constitutes an arbitrary exercise of authority. Plaintiffs' termination letters all summarily asserted that the relevant grant "no longer effectuates the program goals or agency priorities." OJP's use of Section 200.340(a)(4) to allow for the termination anytime it "changes" agency priorities invites the very sort of arbitrary terminations that are at issue in this case. If OJP—or any other agency—can change priorities, with no notice, and abruptly terminate millions or billions of dollars of grant funding on the basis of changed political priorities, then there would cease to be any stability or certainty associated with federal grant funding. OJP's open-ended and capacious interpretation would fail to provide prospective and actual grantees with any notice of the conditions upon which their grants could be terminated. OJP also failed to explain how Plaintiffs' work *fails* to effectuate the agency's stated priorities. Indeed, as detailed above and in the Complaint, these are precisely the goals of many of the putative class members. OJP's interpretation of 2 C.F.R. § 200.340(a)(4) is so vague and capacious that it is unconstitutional and void for vagueness.

Moreover, the words "effectuate," "goals," and "priorities," at least, are not defined in the letters, law, or regulations, and are the sorts of open-ended terms that courts have found unconstitutionally vague in the past. The termination letters went on to "explain" some of those new priorities, including "more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual

assault, and better coordinating law enforcement efforts at all levels of government." But these newly announced priorities are also not contained in any guidance, law, or regulation and were not included defined within Plaintiffs' award grant documents. 2 C.F.R. § 200.106 (requiring federal agencies to "implement" OMB guidance "in codified regulations").

C. OJP violated the separation of powers, the Spending and Appropriations Clauses, and the Take Care Clause.

Plaintiffs are also likely to succeed on the merits because Defendants' blanket refusal to spend appropriations violates constitutional provisions preserving the separation of powers by giving Congress—not the Executive—the "exclusive power" of the purse. *Dep't of Navy v. Fed. Lab. Rels. Auth.*, 665 F.3d 1339, 1346 (D.C. Cir. 2012) (quoting *Rochester Pure Waters Dist. v. EPA*, 960 F.2d 180, 185 (D.C. Cir. 1992)); *and see* The Federalist No. 58, at 359 (James Madison) (Clinton Rossiter ed., 1961)) (Congress' exclusive power of the purse is "a bulwark of the Constitution's separation of powers among the three branches of the National Government.").

The Executive Branch has no appropriations power. Its only powers "stem either from an act of Congress or from the Constitution itself." *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U.S. 579, 585 (1952). The Constitution vested the power of the purse only in Congress, through the Spending Clause—first among Congress' enumerated power in Article I, Section 8—and the Appropriations Clause, which forbids the expenditure of federal funds except "in Consequence of Appropriations made by Law." U.S. Const., art. I, § 9, cl. 7. And Congress, in turn, specifically barred the Executive Branch from interfering in appropriations and spending. Responding to Nixonian overreach, it passed the Impoundment Control Act, which commands that appropriated funds "shall be made available for obligation" absent congressional recission. Pub. L. No. 93-344, 88 Stat. 297, 334 (July 12, 1974) (codified as amended at 2 U.S.C. §§ 682 *et seq.*). Later, it passed the Anti-Deficiency Act Amendments of 1982, prohibiting executive officers from holding appropriated funds in reserve. Pub. L. No. 97-258, 96 Stat. 929 (Sept. 13, 1982) (codified as amended in Title 31).

With no statutory or constitutional mandate, the Executive's authority around spending is at its "lowest ebb." *See Youngstown*, 343 U.S. at 637 (R. Jackson, J., concurring). The President cannot

spend money without Congress' blessing—and he cannot "unilaterally refuse" to spend money that Congress appropriated, either. *In re Aiken County*, 725 F.3d 225, 261 n. 1 (D.C. Cir. 2013). "Absent congressional authorization, the Administration may not redistribute or withhold properly appropriated funds in order to effectuate its own policy goals." *City & County of San Francisco*, 897 F.3d at 1235.

Everything from longstanding practice to persuasive new caselaw shows that Defendants' unilateral refusal to disburse congressional grant funding offends these bedrock constitutional principles. In 1838, the Supreme Court granted a writ of mandamus compelling an executive branch official to pay a congressionally mandated award that he had attempted to withhold. *Kendall v. United States*, 37 U.S. (12 Pet.) 524, 610 (1838). In 1969, then-DOJ lawyer William Rehnquist wrote an Office of Legal Counsel opinion explaining that "the suggestion that the President has a constitutional power to decline to spend appropriated funds … is supported by neither reason nor precedent." *Presidential Authority to Impound Funds Appropriated for Assistance to Federally Impacted Schools*, 1 Op. O.L.C. Supp. 303, 309 (1969). The future Chief Justice was hardly an outlier: just a few years later, the Supreme Court held that a statute providing that sums "authorized to be appropriated . . . *shall be allotted*" required the expenditure of the entire amount, leaving the Executive no discretion to reduce the amount of funding. *Train v. City of New York*, 420 U.S. 35, 42 (1975) (emphasis added).

Nothing has changed, in the Constitution or the caselaw. Just a few months ago, for instance, a federal court explained that the Executive Branch cannot simply substitute its preferences for the congressional mandate: "The Executive Branch has a duty to align federal spending and action with the will of the people as expressed through congressional appropriations, not through 'Presidential priorities.'" *New York v. Trump*, No. 1:25-cv-00039, 2025 WL 357368, at *2 (D.R.I. Jan. 31, 2025). The next month, in *PFLAG, Inc. v. Trump*, another court found that the Executive Branch "unconstitutionally intrude[d] upon the Congressional prerogative to control the public fisc" when it simply refused to spend appropriated grant funds rather than "ask Congress to rescind" them. No. 8:25-cv-00337, 2025 WL 510050, at *17 (D. Md. Feb. 14, 2025). So too here.

It matters not at all that Congress allocated these funds to be disbursed through a grantmaking process, rather than earmarking them to specific organizations. Congress may have given Defendants discretion in how to allocate the funds. It did not give Defendants the option of simply pocketing $800 million and walking away. To the contrary: Congress specifically instructed Defendants to seek congressional approval before diverting more than 5% of any DOJ funding tranche. Pub. L. No. 118-42, Div. C, Title II § 205, 138 Stat. 25, 153 (Mar. 9, 2024).

In appropriations as elsewhere, the president cannot make new law: he can only faithfully execute Congress' laws. *See* U.S. Const. art. II, § 3; *Clinton v. City of New York*, 524 U.S. 417, 438 (1998) ("There is no provision in the Constitution that authorizes the President to enact, to amend, or to repeal statutes."). As now-Justice Kavanaugh wrote for the D.C. Circuit: if the President wants to withhold congressionally-approved funding, he "must propose the rescission of funds, and Congress then may decide whether to approve a rescission bill." *In re Aiken Cnty.*, 725 F.3d at 261 n.1. The Executive Branch cannot, as it did here, "unilaterally amend[] or cancel[] federal appropriations." *PFLAG,* 2025 WL 510050, at *21. That violation of core constitutional principles calls for this Court's immediate preliminary intervention.

III. This Court has Jurisdiction Over all of Plaintiffs' Claims

In defending against other cases challenging grant terminations, the United States has argued that cases like this one resemble breach of contract claims for which the United States has waived its sovereign immunity only in the Court of Federal Claims. That is wrong on multiple fronts.

First, the government's jurisdictional objection does not apply to Plaintiffs' constitutional claims, as the government itself recognized in another recent case. *See Aids Vaccine Advoc. Coal. v. U.S. Dep't of State*, No. 1:25-cv-00400, 2025 WL 752378, at *7 n.6 (D.D.C. Mar. 10, 2025). The government's objection turns on the scope of the waiver of sovereign immunity in Section 702 of the APA. But the waiver of sovereign immunity in Section 702 is irrelevant to Plaintiffs' constitutional and *ultra vires* claims because unconstitutional action by a "federal officer 'is beyond the officer's powers and is, therefore, not the conduct of the sovereign'"—so no sovereign immunity attaches in

the first place. *Pollack v. Hogan*, 703 F.3d 117, 120 (D.D.C. 2012). Wholly apart from the scope of the waiver of sovereign immunity in Section 702 of the APA, "suits for specific relief against officers of the sovereign" allegedly acting unconstitutionally are not barred by sovereign immunity. *Id.*; *see also Sedita v. United States*, 763 F. Supp. 3d 63, 74 n.4 (D.D.C. 2025) (the *Larson* exception "continues to operate despite the APA," so "even if the APA waiver is inapplicable, the Federal Officers are stripped of official immunity").

Second, Section 702 of the APA does in fact waive the government's sovereign immunity in federal district court for all the claims in this case. That provision waives the government's immunity from claims against agencies and agency officials—and permits those claims to be brought in district court—so long as two requirements are met: (1) the claim "seek[s] relief other than money damages," and (2) no "other statute that grants consent to suit expressly or impliedly forbids the relief which is sought." 5 U.S.C. § 702. Both requirements are satisfied here.

A. Plaintiffs seek relief other than money damages.

Plaintiffs request an order declaring that OJP's grant terminations are unlawful, setting the terminations aside, and imposing injunctive relief that would block OJP from implementing the terminations. It is true that this relief would require OJP to disburse grant money to Plaintiffs. But it is well established that "[t]he fact that a judicial remedy may require one party to pay money to another is not a sufficient reason to characterize the relief as 'money damages.'" *Bowen v. Massachusetts*, 487 U.S. 879, 893 (1988). Rather, "money damages" are amounts "given to the plaintiff to substitute for a suffered loss," such as "injury to [the plaintiff's] person, property, or reputation." *Id.* at 893, 895. They "could be far greater than the amount withheld pursuant to the agency policy." *Aids Vaccine Advoc. Coal.*, 2025 WL 752378, at *8 (D.D.C. Mar. 10, 2025).

"Money damages" are distinct from "specific remedies," which "are not substitute remedies at all, but attempt to give the plaintiff the very thing to which he was entitled." *Bowen*, 487 U.S. at 895 (internal quotation marks omitted). A court gives the plaintiff the very thing to which it is entitled where it "orders a defendant to pay a sum owed out of a specific res"—such as a particular

appropriation. *City of Houston v. HUD*, 24 F.3d 1421, 1428 (D.C. Cir. 1994). Such an award "constitutes specific relief" available under Section 702 of the APA, not "money damages." *Id.* Likewise, when an order requires disbursement of funds subject to the terms and conditions of an agreement—as opposed to a "free and clear transfer of money"—that "strings-attached disbursement" is equitable relief, not money damages. *Lummi Tribe of the Lummi Rsrv. v. United States*, 870 F.3d 1313, 1318–19 (Fed. Cir. 2017).

Here, the full declaratory and injunctive relief sought would effectively require OJP to release money it has currently frozen, but that money would both come with strings attached (all the terms and conditions of the grant awards) and be "the very thing to which" Plaintiffs are entitled. Plaintiffs therefore seek relief "other than money damages," Section 702's first requirement is accordingly satisfied, and jurisdiction is proper in this Court.

B. The Tucker Act does not impliedly forbid Plaintiffs from seeking relief in the district court.

Section 702's second requirement is also satisfied because, contrary to the government's contentions, the Tucker Act does not "impliedly forbid" this Court from considering Plaintiffs' claims.

The Tucker Act vests the Court of Federal Claims with jurisdiction over "express or implied contract[s] with the United States." 28 U.S.C. § 1491(a)(1). Under D.C. Circuit precedent, this grant of jurisdiction to the Court of Federal Claims "provid[es] the exclusive remedy for contract claims against the government" and therefore "impliedly forbids" district courts from considering such claims. *Transohio Sav. Bank v. Dir., Off. of Thrift Supervision*, 967 F.2d 598, 609 (D.C. Cir. 1992), *overruled in part on other grounds*, *Perry Cap. LLC v. Mnuchin*, 864 F.3d 591, 620 (D.C. Cir. 2017).[4]

Here, the Tucker Act does not apply and therefore does not divest this Court of jurisdiction for two independent reasons. *First*, Plaintiffs' grant agreements are not the type of agreement that can

[4] There is reason to doubt this precedent because, as the Supreme Court pointed out, no "language in the Tucker Act" makes the Court of Federal Claims' jurisdiction over contract claims "exclusive." *Bowen*, 487 U.S. at 910 n.48. As the D.C. Circuit also recognized, there is a "strong case" that, in fact, "the Tucker Act should not be read to 'impliedly forbid'" district courts from considering "contract actions for specific relief." *Transohio*, 967 F.2d at 612. Plaintiffs reserve the right to seek reconsideration of this precedent in an appropriate forum.

give rise to Tucker Act jurisdiction. *Second*, even if the grant awards could be construed as contracts, Plaintiffs' claims are not contract claims.

i. Plaintiffs' grant agreements are not the type of "agreement" covered by the Tucker Act.

A federal district court cannot "be deprived of jurisdiction by the Tucker Act when no jurisdiction lies in the Court of Federal Claims." *Tootle v. Sec'y of the Navy*, 446 F.3d 167, 176 (D.C. Cir. 2006); *accord Am. Near E. Refugee Aid v. USAID*, 703 F. Supp. 3d 126, 132 (D.D.C. 2023). After all, "[t]here cannot be exclusive jurisdiction under the Tucker Act if there is no jurisdiction under the Tucker Act." *Tootle*, 446 F.3d at 177. Here, the Court of Federal Claims has no jurisdiction under the Tucker Act to consider Plaintiffs' claims that OJP violated the Constitution and the APA, and that its actions were *ultra vires*, when it terminated Plaintiffs' grant awards: those awards, which are implemented through grant and cooperative agreements between OJP and Plaintiffs, are not the type of agreements that give rise to jurisdiction in the Court of Federal Claims.

First, the agreements are not contracts at all. "For the Court of Federal Claims to have jurisdiction, a contract must contain the four required elements of offer, acceptance, consideration, and proper government authority." *Am. Near E. Refugee Aid*, 703 F. Supp. 3d at 132 (citation and internal quotation marks omitted). The consideration must benefit the government in a "direct, tangible" way. *Id.* at 133. Grants and cooperative agreements like those at issue in this case do not confer direct and tangible benefits on the government. *See id.* at 134 ("[I]f benefits as amorphous as the advancement of U.S. foreign policy interests could constitute consideration, then every cooperative agreement would transform into a contract.").

Second, even if the grant agreements here qualified as contracts, they are not the type of contract over which the Court of Federal Claims has jurisdiction. For the Court of Federal Claims to have jurisdiction, a "contract" claim must be based on a contract that creates a right to money damages—and Plaintiffs' agreements create no such right. That is because the Court of Federal Claims has jurisdiction under the Tucker Act only if the plaintiff "present[s] a claim for 'actual, presently due money damages from the United States.'" *Nat'l Air Traffic Controllers Ass'n v. United States*, 160 F.3d

714, 716 (Fed. Cir. 1998) (quoting *United States v. King*, 395 U.S. 1, 3 (1969)). And to do that—and thereby to come within the "jurisdictional reach" of the Court of Federal Claims—the plaintiff must identify a "source of substantive law" that is "money-mandating" in the sense that it "creates the right to money damages." *Lummi Tribe*, 870 F.3d at 1317.

A contract can be such a money-mandating source—but not all contracts are. *See, e.g.*, *Rick's Mushroom Serv., Inc. v. United States*, 521 F.3d 1338, 1343 (Fed. Cir. 2008) (holding that agreement there did "not provide a substantive right to recover money-damages" and that the Court of Federal Claims therefore lacked jurisdiction). For ordinary contracts, there is a "presumption that money damages are available" because "damages are the default remedy for breach of contract." *Holmes v. United States*, 657 F.3d 1303, 1314 (Fed. Cir. 2011) (internal quotation marks omitted).

But that presumption does not hold for all agreements. Under the grant agreements at issue here, the recipient generally must use the awarded funds for a specified public purpose and subject to various conditions. Moreover, cooperative agreements, by statute, are distinct from grants only in that they involve a *greater* degree of agency involvement; what holds for a cooperative agreement should be equally true for a grant. Given the distinct features of these types of agreements, it is not fair to presume that money damages are available: money damages are a free-and-clear payment with no strings attached, so awarding them would circumvent the limitations of the agreement.[5] Thus, when this type of agreement is involved, jurisdiction lies in the Court of Federal Claims only if there is some affirmative indication that the agreement creates a right to money damages. *See St. Bernard*, 134 Fed. Cl. at 735.

Given these principles, Plaintiffs' grant agreements are not contracts that give rise to Tucker Act jurisdiction: they carry no presumption of a right to money damages. The agreements provide money for Plaintiffs to carry out a public purpose and do not provide any "property or services for

[5] In fact, the federal government took the position in the Federal Circuit that a party who has not received grant funds to which it was entitled can never recover money damages—and that jurisdiction is not proper in the Court of Federal Claims—because that "would allow [it] to avoid the strings-attached nature of the award." *See* Opening Br. of Def.-Appellant at 30–33, *112 Genesee St., LLC v. United States*, No. 25-1373 (Fed. Cir. Mar. 14, 2025), ECF No. 15.

the direct benefit or use" of the government, 31 U.S.C. § 6305. No provision of the agreements provides for money damages in the event of the government's breach. *See St. Bernard*, 134 Fed. Cl. at 735 (holding that cooperative agreement did not allow for money damages where no "specific provision in the agreement contemplat[ed] money damages for breach" by the federal agency). Nor is there any other basis to read the agreements as authorizing money damages in these circumstances. To the contrary, money damages would circumvent the many restrictions that the agreements impose on Plaintiffs' use of the funds, including the requirements that Plaintiffs use those funds for the public purposes for which they were intended. Because Plaintiffs' agreements cannot be read to create the "right to money damages" needed to fall within the Tucker Act's "jurisdictional reach," *Lummi Tribe*, 870 F.3d at 1317, "the Claims Court lacks jurisdiction, [and] the Tucker Act does not deprive this Court of jurisdiction." *Am. Near E. Refugee Aid*, 703 F. Supp. 3d at 134 (citing *Tootle*, 446 F.3d at 176).

ii. Plaintiffs' claims are not contract claims.

Even if Plaintiffs' grant awards were the type of agreement that could give rise to jurisdiction in the Court of Federal Claims under the Tucker Act, Plaintiffs' claims would still not be subject to the Tucker Act because they are statutory and constitutional claims, not contract claims.

While the Tucker Act provides the Court of Federal Claims with exclusive jurisdiction over "contract claims against the government," the fact that a contract is involved is not enough to make a claim a "contract claim." *Transohio*, 967 F.2d at 609; *see, e.g.*, *Crowley Gov't Servs., Inc. v. GSA*, 38 F.4th 1099, 1107 (D.C. Cir. 2022) ("explicitly reject[ing] the broad notion that any case requiring some reference to or incorporation of a contract is necessarily on the contract and therefore directly within the Tucker Act" (internal quotation marks omitted)). The question is whether the claims "are founded only on a contract, or whether they stem from a statute or the Constitution." *Transohio*, 967 F.2d at 609 (emphasis added). Whether a claim "at its essence" is contractual turns on (1) "the source of the rights" underlying the claims, and (2) "the type of relief sought (or appropriate)." *Perry Cap. LLC*, 864 F.3d at 619 (quoting *Megapulse, Inc. v. Lewis*, 672 F.2d 959, 968 (D.C. Cir. 1982)). Both prongs make

clear that the Tucker Act does not apply here because Plaintiffs' claims are not contractual in nature and that this Court therefore has jurisdiction.

Courts determine the "source of the rights" at issue by reading the complaint with "an eye toward 'the true nature of the action.'" *Am. Ass'n of Colls. for Tchr. Educ. v. McMahon*, No. 1:25-cv-00702, 2025 WL 863319, at *3 (D. Md. Mar. 19, 2025) (quoting *Williams v. Roth*, No. 8:21-cv-02135, 2022 WL 4134316, at *5 (D. Md. Sept. 12, 2022)). The sources of the rights in this case are the Constitution, the Administrative Procedure Act, and the Uniform Guidance regulations. The question is not whether a contract is the source of the relationship between the parties. *See, e.g.*, *United States v. J & E Salvage Co.*, 55 F.3d 985, 988 (4th Cir. 1995). The question is whether the legal claims require the court to analyze contract terms under contract law, *see id.*, or instead to "examin[e] the federal regulations and federal statute[s] governing Plaintiffs' grant awards." *Climate United Fund v. Citibank, N.A.*, No. 1:25-cv-00698, 2025 WL 1131412, at *9 (D.D.C. Apr. 16, 2025); *Woonasquatucket*, 2025 WL 1116157, at *13

Here, Plaintiffs challenge OJP's termination of their grants as unconstitutional, *ultra vires*, contrary to law, and insufficiently explained and reasoned. Resolution of these claims will require this Court to "address clear regulatory and statutory questions" regarding OJP's termination of the grants and, ultimately, whether OJP violated the APA and the Constitution. *Id.* at *9. Plaintiffs' "claims arise under a federal grant program and turn on the interpretation of statutes and regulations rather than on the interpretation of an agreement negotiated by the parties," so the Tucker Act does not apply. *Md. Dep't of Hum. Res. v. HHS*, 763 F.2d 1441, 1449 (D.C. Cir. 1985); *see also Woonasquatucket*, 2025 WL 1116157, at *13 (finding district court jurisdiction was proper because Plaintiffs' claims "'turn[ed] on federal statute and regulations put in place by Congress' and the agencies."); *Am. Bar. Ass'n v. DOJ*, No. 1:25-cv-01263, 2025 WL 1388891, at *5 (D.D.C. May 14, 2025) ("Because the source of the right underlying the ABA's First Amendment retaliation claim is the Constitution, not the cooperative agreements, its claim is not essentially a contract action.").

That regulations—here, the Uniform Guidance—are incorporated into the grants does not turn Plaintiffs' claims into contract claims. District courts cannot be divested of jurisdiction—and their ability to grant equitable relief—under the Constitution, APA, or any other statute whenever a grant incorporates that legal authority. If that were true, "the government might creatively contract their way out of judicial reviewability of its actions, shielding itself by virtue of its 'contractual relationship' with a party. That cannot be, and is not, what Congress envisioned for judicial review under the APA. Nor is it the law." *Climate United Fund*, 2025 WL 1131412, at *12.

The type of relief Plaintiffs' request—prospective, equitable relief—also suggests that this is not a contract case. Plaintiffs do not seek the ordinary contractual relief of money damages here. Nor would such relief be "appropriate"; Plaintiffs are not owed specific, calculated sums "designed to compensate for completed labors," *Maine Cmty. Health Options v. United States,* 590 U.S. 296, 327 (2020) (quoting *Bowen*, 487 U.S. at 904-05, 904 n.39). Plaintiffs have already received (or will receive) compensation for their completed labors. Instead, what Plaintiffs seek is an injunction preventing OJP from implementing, maintaining, or giving effect to unlawful grant terminations. *See Woonasquatucket*, 2025 WL 1116157, at *14 ("The Nonprofits' primary purpose in bringing their claims is to seek equitable, not monetary, relief. They do not bring claims for past pecuniary harms. Rather, like the plaintiffs in *Bowen* and *Massachusetts*, 'their claims are to preserve their ongoing and prospective' agreements with the Government. And the various harms the Nonprofits identified correspond to that relief."). And while this relief may resemble an order requiring specific performance, D.C. Circuit precedent makes clear "that a federal district court may accept jurisdiction over a *statutory or constitutional* claim for injunctive relief even where the relief sought is an order forcing the government to obey the terms of a contract—that is, specific performance." *Transohio*, 967 F.2d at 610 (emphasis added). Here, the basis for the relief is Plaintiffs' statutory and constitutional rights, not their grant agreements, so they may pursue their claims in district court even if some of the relief sought looks like specific performance at first glance. *See Am. Bar. Ass'n v. DOJ*, 2025 WL 1388891, at *6 ("That the specific

relief sought here—preventing the government from terminating the contract for retaliatory reasons—may result in a monetary payout does not convert it into a claim for money damages.").

iii. The emergency stay order in *California v. Department of Education* does not compel a different result.

The Supreme Court's four-paragraph, *per curiam* order in *Department of Education v. California*, 145 S. Ct. 966 (2025) does not compel a different result. The Court in that case had no occasion to consider whether the grant agreements there were the type of contract that can give rise to Tucker Act jurisdiction because no party raised that issue. Whatever precedential force a one-paragraph discussion in an emergency order issued without full briefing or a hearing might otherwise have, it cannot control issues that were not presented to the Court.

The tide of post-*California* case law agrees that constitutional or statutory challenges to agency actions belong in federal district court, and not the Court of Federal Claims. *See Widakuswara v. Lake*, No. 1:25-CV-1015-RCL, 2025 WL 1166400, at *9-10 (D.D.C. Apr. 22, 2025);[6] *Climate United Fund*, 2025 WL 1131412, at *9–12; *Woonasquatucket*, 2025 WL 1116157, at *12–15; *Chi. Women in Trades v. Trump*, No. 1:25-cv-02005, 2025 WL 1114466, at *8–10 (N.D. Ill. Apr. 14, 2025); *New York v. Trump*, No. 1:25-cv-00039, 2025 WL 1098966, at *1–3 (D.R.I. Apr. 14, 2025); *Maine v. USDA*, No. 1:25-cv-00131, 2025 WL 1088946, at *14-15 (D. Me. Apr. 11, 2025); Order, *Sustainability Inst. v. Trump*, No. 2:25-cv-02152 (D.S.C. April 9, 2024), ECF No. 52; *Am. Bar. Ass'n v. DOJ*, No. 1:25-cv-01263, 2025 WL 1388891, at *5 (D.D.C. May 14, 2025).

IV. Plaintiffs Will Suffer Irreparable Harm Absent Injunctive Relief.

Plaintiffs can establish irreparable harm by demonstrating that OJP's terminations have caused harm that is "'certain and great,' 'actual and not theoretical,' and so 'imminen[t] that there is a clear and present need for equitable relief to prevent irreparable harm.'" *League of Women Voters of U.S. v.*

[6] A three-judge panel of the D.C. Circuit stayed this decision. *Widakuswara v. Lake*, No. 25-5144, 2025 WL 1288817, at *1 (D.C. Cir. May 3, 2025). The D.C. Circuit, sitting *en banc*, thereafter administratively stayed the three-judge panel decision in order to give the court opportunity to consider petitions for rehearing *en banc*. *See Middle E. Broad. Networks, Inc., v. United States*, No. 25-5150, 2025 WL 1378735, at *1 (D.C. Cir. May 7, 2025).

Newby, 838 F.3d 1, 7–8 (D.C. Cir. 2016) (alteration in original) (quoting *Chaplaincy of Full Gospel Churches v. England*, 454 F.3d 290, 297 (D.C. Cir. 2006)). Plaintiffs can also establish irreparable harm by demonstrating that OJP's terminations "unquestionably make it more difficult for the [Plaintiffs] to accomplish their primary mission." *League of Women Voters of U.S.*, 838 F.3d at 9. In the grant context, irreparable harm is established where the immediate termination of grants would affect the existence of programs and the livelihoods of individuals within those programs. *Nat'l Council of Nonprofits v. OMB*, No. 1:25-cv-00239, 2025 WL 368852, at *13 (D.D.C. Feb. 3, 2025) (finding irreparable harm to plaintiffs where programs "may simply disappear" and others would have been forced to shutter programs just to make payroll) (citation and internal quotation marks omitted).

Plaintiffs have amply established substantial and irreparable harm. The loss of grant funding has and will continue to "have devastating effects" on Plaintiffs' projects and programs and "imminent harm is unavoidable." *Climate United Fund*, 2025 WL 1131412, at *12, 17. All Plaintiffs have been forced to eliminate or severely restrict critical, often life-saving services in their communities that were funded by terminated grants. Ridini Decl. ¶¶ 25, 18a–b, 42; Kennedy Decl. ¶ 15. This has had "devastating" impacts on the communities that Plaintiffs serve who rely on these services. Ridini Decl. ¶ 42. The harm from these terminations is not "theoretical" to the communities Plaintiffs serve. Kennedy Decl. ¶ 16. "[I]n 23 hospitals across the country, individuals who directly benefitted from these intervention programs in the hospital are no longer going to have life-saving assistance, and in some cases, members in the community will lose their lives because of the disruption of services." Ridini Decl. ¶ 25. Without a reinstatement of funding, many of these programs will have to be eliminated altogether. Sottile Decl. ¶ 18. These terminations have devastated Plaintiffs' ability to carry out their mission, maintain programming, attract and retain qualified staff, and expand life-saving interventions urgently needed by the communities that they serve. Ridini Decl. ¶ 52; Kennedy Decl. ¶ 26; Choi Decl. ¶¶ 25–27. *See Sierra Club v. USDA, Rural Utils. Serv.*, 841 F. Supp. 2d 349, 358 (D.D.C. 2012) (Threats to public health establish irreparable harm.). And although some Plaintiffs have been

able to reallocate funds from other projects to keep vital services afloat, these scarce funds must be taken from other important priorities and services. Kennedy Decl. ¶ 12; Turner Decl. ¶ 28.

Plaintiffs have already been "forced to terminate staff." *Am. Ass'n of Colls. for Tchr. Educ.*, 2025 WL 833917, at *23. Kennedy Decl. ¶ 18; Sottile Decl. ¶ 15a; Choi Decl. ¶ 22b. And Plaintiffs will be forced to lay off more staff members if their funding is not reinstated, some of whom "rely on such funding for their livelihoods." *Am. Ass'n of Colls. for Tchr. Educ.*, 2025 WL 833917, at *23.

OJP's sudden, unexplained terminations have also severely eroded Plaintiffs' reputations and "relationship with longstanding partners," *AIDS Vaccine Advoc. Coal.*, 2025 WL 752378, at *19, that have been painstakingly built over years in their communities, and have eroded Plaintiffs' "goodwill, reputation, and relationships with employees, partners, subcontractors," *id.* at *3 n.2; *see also Whole Foods Market Grp., Inc. v. Wical Ltd P'Ship*, 288 F. Supp. 3d 176, 190 (D.D.C. 2016) (discussing harm to "reputation in the community—harm that cannot be reversed").

Finally, Plaintiffs will continue to suffer harms that cannot be fully rectified, and absent preliminary injunctive relief, the funding to which Plaintiffs are entitled may become unrecoverable if and when OJP reallocates appropriated funds to other recipients. Indeed, OJP has told a member of Congress that "[t]he Department is committed to swiftly closing out the balance of the terminated grants and reallocating available funds through new grants." *See* Steven Hough, Dep't of Just., Office of Legis. Affs, Letter to Sen. Charles E. Grassley (May 9, 2025), https://perma.cc/EAS7-XAHM. "[I]n cases involving government expenditures, 'once the relevant funds have been obligated, a court cannot reach them in order to award relief.'" *Climate United Fund*, 2025 WL 1131412, at *17 (quoting *City of Houston*, 24 F.3d at 1426–27); *cf. id.* ("Any transfer, re-allocation, or re-obligation of these funds would be an irreparable loss—one that threatens the very existence of Plaintiffs' businesses."). In order to prevent irreparable loss as a result of reallocation that Defendants have already publicly committed to, Plaintiffs request preliminary injunctive relief.

V. The Balance of Equities and Public Interest Weigh Heavily in Plaintiffs' Favor.

The balance of equities and public interest prongs merge when the government is the opposing party. *Nken v. Holder*, 556 U.S. 418, 435 (2009). "It is well established that the Government cannot suffer harm from an injunction that merely ends an unlawful practice." *C.G.B. v. Wolf*, 464 F. Supp. 3d 174, 218 (D.D.C. 2020) (quotation marks and citations omitted). Likewise, "[t]here is generally no public interest in the perpetuation of unlawful agency action." *Open Cmtys. All. v. Carson*, 286 F. Supp. 3d 148, 179 (D.D.C. 2017) (quotation marks and citation omitted). "To the contrary, there is a substantial public interest in having governmental agencies abide by the federal laws—such as the APA, as well as regulations … that govern their existence and operations." *Id.* (internal quotation marks and citations omitted). That is especially true where, as here, constitutional rights are at stake. The Constitution "is the ultimate expression of the public interest," so "government actions in contravention of the Constitution are always contrary to the public interest." *Turner v. U.S. Agency for Global Media*, 502 F. Supp. 3d 333, 386 (D.D.C. 2020) (cleaned up); *see also, e.g., Costa v. Bazron*, 456 F. Supp. 3d 126, 137 (D.D.C. 2020) ("[I]t is always in the public interest to prevent the violation of a party's constitutional rights." (internal quotation marks and citation omitted)). Thus, for the same reasons that Plaintiffs are likely to succeed on the merits, equity and the public interest require relief.

Granting preliminary relief is in the public interest because it will preserve vital services for communities most in need. This includes services for disabled victims of crime presently being turned away from vital resources to allow them to communicate with law enforcement, violence intervention programs in hospitals around the country to help severely wounded individuals and reduce the risk of retaliation upon discharge from the hospital; the provision of resources and necessary care to AAPI victims of hate crimes and violence; programs to serve young people at the highest risk of gun and gang violence that have successfully reduced fatal and non-fatal shootings. Without reinstatement of unlawfully terminated funding, individuals will not be able to access these services, individuals may lose their lives, and the public as a whole will be less safe.

Given the real and immediate harm that the public faces as a result of OJP's terminations, the equities and public interest strongly favor preliminary relief. On the other side of the ledger, the burden of an injunction on OJP would be minimal. In the context of the APA, "[t]he public interest is served when administrative agencies comply with their obligations." *Northern Mariana Islands*, 686 F. Supp. 2d at 21. An injunction would require nothing more.

VI. The Court Should Not Require a Bond

Federal Rule of Civil Procedure 65(c) "vest[s] broad discretion in the district court" to require bonds, *DSE, Inc. v. United States*, 169 F.3d 21, 33 (D.C. Cir. 1999), including "to require no bond at all," *P.J.E.S. ex rel. Escobar Francisco v. Wolf*, 502 F. Supp. 3d 492, 520 (D.D.C. 2020) (internal quotation marks omitted). A bond "is not necessary where requiring [one] would have the effect of denying the plaintiffs their right to judicial review of administrative action." *Nat. Res. Def. Council, Inc. v. Morton*, 337 F. Supp. 167, 168 (D.D.C. 1971) (collecting cases).

In enjoining unlawful funding terminations, courts in this district and across the country have declined to require plaintiffs to post bond. *See, e.g.*, *RFE/RL, Inc.*, 2025 WL 900481; *Nat'l Council of Nonprofits*, 2025 WL 597959, at *19 (D.D.C. Feb. 25, 2025); *Colorado v. HHS*, No. 1:25-cv-00121, 2025 WL 1017775, at *6 (D.R.I. Apr. 5, 2025); *Cmty. Legal Servs. in East Palo Alto v. HHS*, No. 3:25-cv-02847, 2025 WL 973318, at *4 (N.D. Cal. Apr. 1, 2025). As one such court recently held, "[i]n a case where the Government is alleged to have unlawfully withheld [large sums] of previously committed funds to countless recipients, it would defy logic—and contravene the very basis of this opinion—to hold Plaintiffs hostage for the resulting harm." *Nat'l Council of Nonprofits*, 2025 WL 597959, at *19; *see also Woonasquatucket*, 2025 WL 1116157, at *24. Plaintiffs' thus request that the Court not require a bond.

CONCLUSION

For these reasons, the Court should grant Plaintiffs' motion and preliminarily enjoin OJP's terminations of Plaintiffs' grants and any actions to implement or enforce the terminations.

Dated: May 22, 2025

Respectfully submitted,

/s/ Lisa Newman
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,

Plaintiffs, on behalf of themselves and all others similarly situated,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

PAMELA J. BONDI, in her official capacity as United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official capacity as Acting Head of the Office of Justice Programs,

Defendants.

Case No.1:25-cv-1643

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Upon careful consideration of Plaintiffs' motion for a preliminary injunction and stay of final agency action pursuant to 5 U.S.C. § 705, and the accompanying memorandum of law in support thereof,

It is hereby ORDERED that the motion is GRANTED;

It is FURTHER ORDERED that Defendants and their agents are ENJOINED from enforcing or otherwise giving effect to the termination of Plaintiffs' grants, including through the enforcement of closeout obligations;

It is FURTHER ORDERED that Defendants and their agents are ENJOINED from re-obligating the funds used to support putative class members' terminated grants;

It is FURTHER ORDERED that Defendants take all steps necessary to ensure that OJP disburses funds to Plaintiffs in the customary manner and in customary timeframes;

It is FURTHER ORDERED that his Order shall apply to the maximum extent provided for by Federal Rule of Civil Procedure 65(d)(2);

It is FURTHER ORDERED that Defendants shall file a status report with the Court within 24 hours of this order apprising the Court of the status of their compliance with this Order.

Ordered this _____ day of May, 2025.

_____
United States District Court Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,

Plaintiffs, on behalf of themselves and all others similarly situated,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

PAMELA J. BONDI, in her official capacity as United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official capacity as Acting Head of the Office of Justice Programs,

Defendants.

Case No. _____

DECLARATION OF RACHEL SOTTILE

I, Rachel Sottile, declare as follows:

1. My name is Rachel Sottile. I am a resident of King County in the State of Washington. I am over the age of eighteen. This declaration is based upon my personal knowledge and the knowledge I have acquired in the course of my duties. If called as a witness, I could and would testify competently to the matters set forth below. I provide this declaration in support of Plaintiffs' motion for preliminary injunction.

2. I serve as the President & CEO of the Children and Youth Justice Center, which does business as the Center for Children & Youth Justice (CCYJ). In this role, I have overall strategic and operational responsibility for CCYJ's mission. My role is to provide leadership and direction for CCYJ, mobilizing broad-base support for youth foster care and juvenile justice systems reform by

convening experts and stakeholders who can identify gaps and effect systemic change, designing new pathways to achieve improved outcomes, independently evaluating these results, and advocating for long-term systemic change. My team and I serve as subject matter experts and resources for system leaders, incubating innovative research, policy, training, and projects that serve as models for reform. I began as President & CEO on December 5, 2018, and have served in the position for over six years.

3. In my role as President & CEO, I oversee the two initiatives affected by the grant termination at issue in this litigation. I also serve as CCYJ's Entity Administrator, binding CCYJ in all awards and agreements, monitoring progress, and addressing barriers. I am accountable for the grant outcomes being fulfilled.

4. Prior to this position, I served as the Vice President of the Pretrial Justice Institute (Baltimore, MD). I also previously served as the Director of Foster Care & Adoptions for Miami-Dade County (FL), Department of Children & Families, D-11, and the Chief Operating Officer of Charlee Homes for Children (Miami, FL). My professional roles and leadership span nearly thirty years, and include providing direct service to foster care youth, and championing state-based and national foster care and juvenile justice systems reform.

CCYJ's Mission and Impacted Programs

5. The Center for Children & Youth Justice is a nonprofit, founded in 2006 by Washington State Supreme Court Justice Bobbe J. Bridge (ret.). CCYJ's Mission is to create better lives for generations of children and youth by reforming the child welfare and juvenile justice systems. As the only organization solely committed to reforming these systems in Washington State, CCYJ's approach is rooted in listening to those most impacted—children, young adults, and families—by failures of these systems, leading to the development, coordination, and implementation of reforms designed to support children and youth, stabilize families, and strengthen communities. To accomplish these reforms, CCYJ works in partnership with local and state government, law

enforcement, courts, schools, coalitions with similar goals, and community-based organizations to test and implement reforms by piloting promising and best practices, facilitating coordination and collaboration among system stakeholders, providing training and ongoing technical assistance, and advocating for data-driven and youth-centered solutions.

6. As part of this work, CCYJ oversees two initiatives directly impacted by the award terminations at issue in this litigation: the Leadership, Intervention, and Change ("LINC") Program and the Community Violence Intervention Capacity Building Project.

7. CCYJ has been an active participant in the development of this lawsuit and has remained in regular communication with Plaintiffs' counsel about this case. CCYJ is willing and able to take an active role in this litigation and to protect the interests of all members of the Class.

CCYJ's Grant Process

8. In general, grant opportunities are evaluated thoroughly by me and the Executive Team to ensure the work prescribed by the grant advances our mission, aligns with how we do our work, and engages with community partners and systems involved youth and/or professionals. We also evaluate the competencies and expertise needed programmatically, the core infrastructure and resources (administrative, technological, finance, compliance, etc.) that will be needed to fulfill the grant requirements, and if the organization is structured in a way to fulfill the work prescribed. CCYJ's programmatic leaders are engaged with the Executive Team at the early stages of consideration of a prospective grant, to ensure the organization is aligned with the opportunity, work required, and intended outcomes. I may consult with CCYJ's Board of Directors as thought partners and advisors, prior to applying for grants. I make the ultimate decision to apply for grants and, if the grant is awarded, bind the organization in the award agreement.

Termination of Grant Funding Without Notice

9. On Tuesday, April 22, 2025 at about 2:30 PM Pacific Time, I received two emails from the Office of Justice Programs, OJP_COMMS@public.govdelivery.com, labeled "Notice of Termination" and purporting to immediately terminate two of CCYJ's awards—Award No. 15PBJA-22-GG-04749-MUMU (CCYJ Award 1) and Award No. 15PBJA-23-GK-05198-CVIP (CCYJ Award 2), attached here as Exhibits 1 and 3, respectively—pursuant to 2 C.F.R. § 200.340(a)(4) because the awards "no longer effectuate agency priorities."

10. The termination emails went on to state that "The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities."

11. No other basis or explanation for the termination was provided. The termination email(s) did not claim CCYJ failed to comply with the terms or conditions of the awards, did not explain how Department priorities might have changed, and did not otherwise explain why the awards supposedly no longer effectuated Department priorities. These two awards together total $6 million dollars, with more than $4.1 million dollars of remaining award funding as of April 22, 2025. True and correct copies of the termination emails are attached as Exhibits 2 and 4.

12. The termination email advised that "[c]onsistent with 2 C.F.R. § 200.342, [CCYJ] may appeal this termination in writing within 30 calendar days of the date of this notice."

13. CCYJ was locked out of the federal grants payment system after receiving the termination notice. CCYJ has approximately $211,000 in known unreimbursed expenses incurred before the awards were terminated. A portion of the outstanding reimbursements—$79,600—should pass through to CBOs who have incurred expenses related to the grant awards. Additional invoices

from CBOs for work performed prior to termination are still pending. But because CCYJ cannot access the payment system, we cannot access funds owed to CCYJ or the CBOs.

14. It was CCYJ's expectation and understanding based on the notice of award, federal law, and our past experience with federal awards that the funds awarded would be available throughout the award periods and that the DOJ could terminate the awards only if CCYJ failed to comply with the terms and conditions of the awards. It was not CCYJ's understanding that the DOJ could terminate these awards based on that agency's unsupported assertion that the awards no longer effectuate agency priorities. CCYJ further understood that costs properly incurred prior to the termination of an award would be reimbursed by the DOJ.

Harm Resulting from Awards Termination

15. The termination of CCYJ's awards created an immediate harm and impact to not only CCYJ's ability to maintain business and programmatic operations prescribed by these awards, but it also denied funds to be paid to four lower-tier contractors and three subrecipients, impacting their ability to have the financial resources to sustain their organizations. As a result of the termination of CCYJ's award:

a. five members of CCYJ's staff were terminated on April 25, 2025;

b. CCYJ has ended the project intended to build the capacity of organizations operating Community Violence Intervention (CVI) strategies in King County, Washington, leaving the county's youth without enhanced CVI services; and

c. an estimated 65 young people will be deprived of direct services from LINC, a program that serves youth who are involved with, or at risk of involvement with, gangs or violence.

16. CCYJ relied and acted upon its expectation and understanding that the DOJ would fulfill its commitment to provide award funding. CCYJ specifically hired project staff, built the

necessary technological, administrative and organizational structures, and executed lower tier subawards and vendor services contracts necessary to accomplish the awards' goals and objectives.

17. DOJ's termination of these awards with no notice forced CCYJ to make cuts in its budget to offset the loss of $1.8 million dollars of budgeted funding for CCYJ's current fiscal year, representing a 32% decrease in annual revenue. This included reducing the budget of one program (including terminating three related contracts) and eliminating all together another project tasked with carrying out the award goals and objectives, terminating four subawards and services contracts that assist CCYJ in carrying out its mission, cutting funding for other programs and support personnel, re-positioning staff into other positions, and laying off five members of our staff (24% of CCYJ's workforce) on April 25, 2025.

18. DOJ's termination of these awards has created immense uncertainty for CCYJ as well as employees in several other organizations with terminated subawards and services contracts, and has required CCYJ employees to spend significant amounts of time working on responding to that disorder and confusion. I, along with many other leaders, have spent an enormous number of hours over the last few weeks attempting to quantify and mitigate the effects of these award terminations—time that could have been spent working to advance child welfare and juvenile justice systems reform, including making our community safer through group/gang violence intervention and prevention.

Award 1: Enhancement of the Leadership, Intervention & Change (LINC) Group Violence Prevention and Intervention in King County, Washington

19. On September 29, 2022, CCYJ was notified that the Office of Justice Programs (OJP) had approved its application for a grant award under the funding opportunity entitled "2022 BJA FY 22 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative." Shortly thereafter, CCYJ accepted the award. The grant award provides $2,000,000 in funding from October 1, 2022, to September 30, 2025. The statutory authority for this award is the Department of

Justice Appropriations Act, 2022 (Pub. L. No. 117-103, 136 Stat. 49, 127); Bipartisan Safer Communities Supplemental Appropriations Act, 2022 (Pub. L. No. 117-159, 136 Stat. 1313, 1339); 28 U.S.C. § 530C.

20. This grant award, titled "Enhancement of the Leadership, Intervention & Change (LINC) Group Violence Prevention and Intervention in King County, Washington" supports CCYJ's regional adaptation and implementation of the Office of Juvenile Justice and Delinquency Prevention, Comprehensive Gang Model (CGM) in Washington's most populous and diverse county. The LINC program, in operation since 2011, is a coordinated effort to prevent and reduce community and gun violence among youth and the involvement of young people in groups and gangs in King County, Washington.

21. The LINC program serves all of King County, with a targeted focus on Seattle and the South King County communities that have historically accounted for more than 90% of firearm violence in the county. LINC's service area includes over twenty cities and spans several law enforcement jurisdictions and school districts, making it a comprehensive initiative aimed at addressing violence prevention and intervention across diverse communities. The LINC program fosters trust, mutual understanding, and collaboration between law enforcement and the community-historically, the LINC program has worked with up to 200 young people annually who are involved with, or at risk of involvement with, gangs and/or violence.[1] The LINC program serves youth that are typically 13-24 years old, carrying a gun or other weapons, self-identify as gang/group involved or,

[1] In 2024, 120 youth were served by LINC. Of these youth, 29 (24%) enrolled in school; 46 (38%) improved school attendance/performance/behavior; 1 (0.8%) was accepted to college; 4 (3%) graduated; 17 (14%) completed probation or court assigned activity; 69 (57.5%) decreased or replaced gang/group activity or association; 42 (35%) obtained employment; 31 (26%) maintained employment; 33 (27.5%) connected to support services; 16 (13%) connected to housing; 2 (1.6%) completed substance use or mental health services; 6 (5%) enrolled in substance use or mental health services; and 14 (11.6%) participated actively in mental health or substance use services.

at high-risk of becoming gang/group involved, juvenile justice impacted, community violence impacted, and disengaged from school.

22. The CGM utilizes an "evidence-based framework for coordinating multiple anti-gang and violence-reduction strategies to address serious gang problems." National Gang Center, A Law Enforcement Official's Guide to the OJJDP Comprehensive Gang Model, https://nationalgangcenter.ojp.gov/comprehensive-gang-model. As described by the National Gang Center, the CGM is "a set of five core strategies—community mobilization, opportunities provision, social intervention, suppression, and organizational change and development—that offer a comprehensive, collaborative approach designed to prevent and reduce gang violence." *Id.* Within the LINC program, CCYJ functions as the Lead Agency and plays a key role in implementing the CGM in King County, Washington, providing fiscal management, administrative coordination and support, direct service coordination, training, and data collection, analysis, and reporting.

23. Services provided to youth are coordinated through street outreach and geographically focused Multi-Disciplinary Intervention Teams (MDITs). LINC MDITs are facilitated by CCYJ and include street outreach workers, case managers, school representatives, probation counselors, behavioral health specialists, employment services providers, and law enforcement officers. Street outreach reaches youth in the community where they are at: physically, emotionally, and developmentally. LINC outreach workers are credible messengers- individuals directly impacted by community violence. They engage and mentor youth and use trauma-informed approaches to help youth set goals and change their lives. The MDITs use a team-based case management approach, reviewing each youth's plan and progress to determine what services can help them meet the goals the youth have identified for themselves.

24. A cross-sector steering committee consisting of local leaders and decision makers oversees the planning, implementation, evaluation, and sustainability of the LINC program. CCYJ

staff have provided training and technical assistance and made professional development opportunities available to steering committee and MDIT members as well as community partners and stakeholders. Training has been provided on a variety of topics related to the implementation of the CGM, including but not limited to universal screening for the commercial sexual exploitation of children, reducing the propensity for violence and victimization in young women, providing culturally appropriate services to diverse communities, the prosecuting attorney's office's safer schools strategy, and crisis response and violence interruption.

25. DOJ terminated this grant with approximately five months remaining and more than $684,100 of funds remaining, including significant funding for lower-tier direct services contracts supporting street outreach and case management services for young people involved with, or at risk of involvement with, violence or gangs.

26. As a result of being forced to terminate direct services contracts, CCYJ estimates that up to 65 young people will no longer be supported by the LINC program. Specifically, the LINC program currently uses a contracted services organization to serve 65 LINC clients through street outreach services. If this organization stops participating, and its leadership has indicated that it will stop participating as a direct result of the loss of this funding, LINC will serve approximately 65 fewer clients. Depending on the capacity of other organizations, there is no guarantee that these young people could be served by other, formerly contracted outreach service providers.

Award 2: Community Violence Intervention Capacity Building Project

27. On September 28, 2023, CCYJ was notified that OJP had approved its application for a cooperative agreement under the funding opportunity entitled "2023 BJA FY 23 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative." Shortly thereafter, CCYJ accepted the cooperative agreement award. The cooperative agreement award provides $4,000,000 in funding from October 1, 2023, to September 30, 2026. The statutory authority for this

cooperative agreement is the Department of Justice Appropriations Act, 2022 (Pub. L. No. 117-103, 136 Stat. 49, 127); Bipartisan Safer Communities Supplemental Appropriations Act, 2022 (Pub. L. No. 117-159, 136 Stat. 1313, 1339); 28 U.S.C. § 530C.

28. Building on CCYJ's many years of experience administering the CGM in King County and providing training and technical assistance on a variety of topics, including addressing the commercial sexual exploitation of children, CCYJ's Community Violence Intervention Capacity Building Project was intended to support three to five community-based organizations (CBOs). These CBOs provide CVI services to young people ages 12-24 years at highest risk of victimization or perpetration of gun violence across King County, Washington. In this work, CCYJ acts as an intermediary organization, providing targeted training and technical assistance and capacity building for implementing and sustaining the CBOs' CVI strategies. The Giffords Center for Violence Intervention recognizes the support of an intermediary organization—like CCYJ—as an important component of building and sustaining effective local CVI initiatives. *See* Leveraging Intermediaries to Strengthen the Community Violence Intervention Field report, The Giffords Center for Violence Intervention, https://giffords.org/report/leveraging-intermediaries-to-strengthen-the-community-violence-intervention-field ("Intermediaries can help community-based organizations build capacity, access more resources, and reach self-sustainability").

29. To select CBO subaward partners, CCYJ conducted a competitive process to engage grassroots and small organizations with annual budgets of less than $5,000,000 that were planning to initiate or were already operating a CVI strategy in King County, Washington. The selection process also involved assessing the organization's readiness for change, cultural responsiveness, and ability to integrate training and technical assistance into their organization to sustain their CVI efforts long term.

30. CCYJ developed a request for proposals, hosted a pre-application solicitation webinar, and ultimately selected three CBO subaward partners. Throughout the process, CCYJ staff regularly

consulted with DOJ Bureau of Justice Assistance (BJA) staff and incorporated their input. Notably, on September 25, 2024, at the invitation of BJA leadership, CCYJ was the national host site for an event in Seattle commemorating the two-year anniversary of the launch of OJP's Community-Based Violence Intervention and Prevention Initiative. Then-Acting Assistant Attorney General Brent J. Cohen and the Director of the National Institute of Justice, Dr. Nancy La Vigne, attended and the event occurred at the organizational home of one of CCYJ's selected subaward recipients. *See* News Release, "Readout of OJP and White House Community Violence Intervention Announcements, U.S. Department of Justice, Office of Justice Programs, September 30, 2024, https://www.ojp.gov/archives/pressreleases/2024/readout-ojp-and-white-house-community-violence-intervention-announcements.

31. CCYJ's efforts to develop subawards with these CBOs required extensive work on the parts of CCYJ and each CBO. CCYJ reviewed and assessed dozens of documents, met with each CBO multiple times, and provided training and technical assistance on completing forms and creating subaward budgets. CCYJ staff developed a comprehensive capacity building assessment tool specifically focused on sustaining an effective CVI initiative and started building out an online resource library for knowledge products related to CVI training, technical assistance, and capacity building. After subaward agreements were finalized in February and March of 2025, CCYJ met regularly with the subrecipients and administered comprehensive capacity building needs assessments to each CBO. Prior to the termination of CCYJ's cooperative agreement by the DOJ, CCYJ was in the process of developing and finalizing capacity building plans for each of the subaward CBO partner organizations.

32. CCYJ's CVI Capacity Building Project cooperative agreement was abruptly terminated with approximately 17 months and $3,420,000 of funds remaining. After this cooperative agreement was terminated, CCYJ was forced to terminate all three subawards as well as a services contract on April 23, 2025. CCYJ had dedicated staff to fulfill this cooperative agreement project. DOJ's

termination of the grant seventeen months early and with no notice necessitated the abrupt cessation of project activities and forced immediate layoffs to occur.

33. Activities related to this cooperative agreement award project have ceased. This means that, despite CCYJ and the CBO's hard and dedicated work to build the sustainability of these organizations and their CVI strategies, none of the CBOs will be supported to enhance their administrative and operational capacity to deliver CVI services for youth at highest risk of victimization or perpetration of gun violence in King County, Washington.

Signature on following page.

Date: May 21, 2025

DocuSigned by:
86F653FD250840A...

Rachel Sottile
President & CEO of the Children and Youth Justice Center
Gainesville, Florida

EXHIBIT 1

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	CHILDREN AND YOUTH JUSTICE CENTER 300 ELLIOTT AVE W STE 360
City, State and Zip:	SEATTLE, WA 98119
Recipient UEI:	LSKMGWH8QEJ9

Project Title: Enhancement of the Leadership, Intervention & Change (LINC) Group Violence Prevention and Intervention in King County, Washington	**Award Number:** 15PBJA-22-GG-04749-MUMU

Solicitation Title: BJA FY 22 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative

Federal Award Amount: $2,000,000.00	**Federal Award Date:** 9/29/22

Awarding Agency:	Office of Justice Programs Bureau of Justice Assistance
Funding Instrument Type:	Grant

Opportunity Category: D
Assistance Listing:
16.045 - Community-Based Violence Intervention and Prevention Initiative

16.045 - Community-Based Violence Intervention and Prevention Initiative

Project Period Start Date: 10/1/22	**Project Period End Date:** 9/30/25
Budget Period Start Date: 10/1/22	**Budget Period End Date**: 9/30/25

Project Description:

The Center for Children & Youth Justice (CCYJ), Leadership, Intervention, & Change - LINC program brings together a community-wide, multi-jurisdictional, and multi-disciplinary coordinated effort to reduce youth gun violence and involvement of young people in gangs in King County, Washington. The project will work with up to 200 young people annually who are involved with, or at risk of involvement with, gangs and/or violence.

LINC implements with fidelity the evidence-based Comprehensive Gang Model (CGM).

The LINC Steering Committee brings together key decision makers from youth-serving agencies, local and state government, school districts, law enforcement, superior court, faith-based leaders, and community and grassroots groups. The Steering Committee shapes the Community Assessment and develops an actionable Community-Specific Violence Reduction Strategic Plan to support ongoing evaluation of LINC's progress in reducing youth gang involvement.

Service provision to youth is coordinated through street outreach and three geographically focused Multi-Disciplinary Intervention Teams (MDITs), which include street outreach workers, case managers, school representatives, probation counselors, behavioral health specialists, law enforcement officers, and employment providers. Street outreach reaches youth in the community where they are at, both physically and emotionally/ developmentally. LINC outreach workers are credible messengers, with lived experience, almost all Black, Indigenous or People of Color (BIPOC). They are able to engage and mentor youth, and use trauma-informed approaches to help youth set goals and change their lives. The MDITs use a team-based case management approach, reviewing each youth's plan and progress to determine what wraparound services can help them meet the goals they have identified for themselves.

Most of LINC's programmatic work is focused in the South King County and Seattle communities that have historically accounted for more than 90% of firearm violence in the county. LINC's system change work through the Steering Committee is countywide in Washington's most populous and diverse county.

Outcomes anticipated for youth depending on their individual goal areas include: 50% reduction in gang activity/ association; 25% improvement in academic performance; 30% enrollment in school; 45% improvement in school attendance; 60% obtaining employment; and 50% attending work regularly.

CCYJ is seeking priority consideration under Priority 1A (see pp 10-11 of narrative); and under Priority 1B (see pp 13-14): through a sub-award with Freedom Project, a culturally specific, grassroots organization directed by and serving BIPOC communities impacted by mass incarceration, receiving $600,000 (30% of requested award funding) over the grant period.

Award Information

Application Number
GRANT13632034

Funding Instrument Type:
Grant

Award Number
15PBJA-22-GG-04749-MUMU

Supplement Number
00

Award Acceptance Date
10/07/2022 01:26 PM EDT

Assistance Listings Number	Assistance Listings Program Title
16.045	Community-Based Violence Intervention and Prevention Initiative
16.045	Community-Based Violence Intervention and Prevention Initiative

Statutory Authority

Department of Justice Appropriations Act, 2022 (Pub. L. No. 117-103, 136 Stat. 49, 127); Bipartisan Safer Communities Supplemental Appropriations Act, 2022 (Pub. L. No. 117-159, 136 Stat. 1313, 1339); 28 U.S.C. 530C

Current Authorized Representative

Title of Authorized Representative
no value

Name of Authorized Representative
Rachel Sottile

Solicitation Information

Solicitation Title

2022 BJA FY 22 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative

Project Title
Enhancement of the Leadership, Intervention & Change (LINC) Group Violence Prevention and Intervention in King County, Washington

Project Description
The Center for Children & Youth Justice (CCYJ), Leadership, Intervention, & Change - LINC program brings together a community-wide, multi-jurisdictional, and multi-disciplinary coordinated effort to reduce youth gun violence and involvement of young people in gangs in King County, Washington. The project will work with up to 200 young people annually who are involved with, or at risk of involvement with, gangs and/or violence.

LINC implements with fidelity the evidence-based Comprehensive Gang Model (CGM).

The LINC Steering Committee brings together key decision makers from youth-serving agencies, local and state government, school districts, law enforcement, superior court, faith-based leaders, and community and grassroots groups. The Steering Committee shapes the Community Assessment and develops an actionable Community-Specific Violence Reduction Strategic Plan to support ongoing evaluation of LINC's progress in reducing youth gang involvement.

Service provision to youth is coordinated through street outreach and three geographically focused Multi-Disciplinary Intervention Teams (MDITs), which include street outreach workers, case managers, school representatives, probation counselors, behavioral health specialists, law enforcement officers, and employment providers. Street outreach reaches youth in the community where they are at, both physically and emotionally/ developmentally. LINC outreach workers are credible messengers, with lived experience, almost all Black, Indigenous or People of Color (BIPOC). They are able to engage and mentor youth, and use trauma-informed approaches to help youth set goals and change their lives. The MDITs use a team-based case management approach, reviewing each youth's plan and progress to determine what wraparound services can help them meet the goals they have identified for themselves.

Most of LINC's programmatic work is focused in the South King County and Seattle communities that have historically accounted for more than 90% of firearm violence in the county. LINC's system change work through the Steering Committee is countywide in Washington's most populous and diverse county.

Outcomes anticipated for youth depending on their individual goal areas include: 50% reduction in gang activity/ association; 25% improvement in academic performance; 30% enrollment in school; 45% improvement in school attendance; 60% obtaining employment; and 50% attending work regularly.

CCYJ is seeking priority consideration under Priority 1A (see pp 10-11 of narrative); and under Priority 1B (see pp 13-14): through a sub-award with Freedom Project, a culturally specific, grassroots organization directed by and serving BIPOC communities impacted by mass incarceration, receiving $600,000 (30% of requested award funding) over the grant period.

Project Budget Summary

Final Budget Clearance

This is the current budget as updated by GAM ID: GAM-587928.

	Year1	Year2	Year3	Total
Personnel	$172,870.21	$170,242.15	$171,842.15	$514,954.51
Fringe Benefits	$51,861.07	$51,072.65	$51,552.65	$154,486.37
Travel	$5,956.07	$6,057.85	$6,064.87	$18,078.79
Equipment	$0.00	$0.00	$0.00	$0.00
Supplies	$9,050.00	$10,989.92	$10,961.20	$31,001.12
Construction	$0.00	$0.00	$0.00	$0.00
SubAwards	$0.00	$0.00	$0.00	$0.00
Procurement Contracts	$55,000.00	$431,523.86	$372,606.86	$859,130.72
Other Costs	$5,823.84	$12,351.48	$12,351.48	$30,526.80
Total Direct Costs	$300,561.19	$682,237.91	$625,379.21	$1,608,178.31
Indirect Costs	$124,785.93	$144,693.87	$122,341.89	$391,821.69
Total Project Costs	$425,347.12	$826,931.78	$747,721.10	$2,000,000.00

Total Project Breakdown

	Total	Percentage
Federal Funds	$2,000,000.00	100.00%
Match Amount	$0.00	0.00%
Program Income Amount	$0.00	0.00%

Budget Detail Summary View

Personnel

Year 1

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	Name	Position	Salary	Rate	Time Worked	Percentage of Time (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	VP Innovation & Impact	$143,360.00	Y	1.00	10.00%	$14,336.00	$0.00	$14,336.00
2	William Hairston	Director of Impact	$104,737.50	Y	1.00	50.00%	$52,368.75	$0.00	$52,368.75
3	Rachel Sottile	President & CEO	$200,000.00	Y	1.00	10.00%	$20,000.00	$0.00	$20,000.00
4	Anna Sneed	Program Coordinator	$57,294.00	Y	1.00	64.00%	$36,668.16	$0.00	$36,668.16
5	Katharine Gregg	Contract & Grants Specialist	$79,380.00	Y	1.00	7.50%	$5,953.50	$0.00	$5,953.50
6	Tiffany Martindale	Monitoring & Evaluation Specialist	$79,380.00	Y	1.00	1.00%	$793.80	no value	$793.80
7	Fredericka Pie	Program Manager	$85,500.00	Y	1.00	50.00%	$42,750.00	no value	$42,750.00

Personnel Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$172,870		

Additional Narrative

- Gina Cumbo, Vice President, Innovation & Impact, is responsible for leading CCYJ's program and policy initiatives, supporting contract and subaward development and compliance, and developing high performing teams.
- Fredericka "Freddie" Pie, Program Manager, is responsible for day-to-day LINC program management, administration, evaluation, and partner training/professional development.
- William "Billy" Hairston, Director of Impact, is responsible for strategic program leadership and fiscal oversight. He drives strategic vision and planning, policy change, partnership development, and sustainability for CCYJ's CVI initiatives.
- Tiffany Martindale, Monitoring & Evaluation Specialist, provides data analysis, monitoring, and reporting for LINC's process and outcome evaluation and strategic plan metrics.
- Rachel Sottile, Executive Director, is a member of the LINC Steering Committee and manages relationships with leadership in the courts, education, child welfare, state and local government and other sectors.
- Anna Sneed, Program Coordinator, is responsible for LINC program administration, evaluation data coordination, and MDIT facilitation.
- Katharine Gregg, Grants & Contracts Specialist provides administrative support and coordination for contracts and federal grant compliance.

Year 2

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	Name	Position	Salary	Rate	Time Worked	Percentage of Time (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	VP Innovation & Impact	$143,360.00	Y	1.00	10.00%	$14,336.00	$0.00	$14,336.00
2	William Hairston	Director of Impact	$104,737.50	Y	1.00	42.00%	$43,989.75	$0.00	$43,989.75
3	Rachel Sottile	President & CEO	$200,000.00	Y	1.00	9.00%	$18,000.00	$0.00	$18,000.00
4	Tatianah Summers	Program Coordinator	$57,294.00	Y	1.00	50.00%	$28,647.00	$0.00	$28,647.00
5	Afsaneh Haddadain	Program Manager	$80,000.00	Y	1.00	58.00%	$46,400.00	$0.00	$46,400.00
6	TBD	Contract & Grants Specialist	$79,380.00	Y	1.00	3.00%	$2,381.40	$0.00	$2,381.40
7	Tiffany Martindale	Monitoring & Evaluation Specialist	$79,380.00	Y	1.00	10.00%	$7,938.00	no value	$7,938.00
8	Fredericka Pie	Associate Director of Impact	$85,500.00	Y	1.00	10.00%	$8,550.00	no value	$8,550.00

Personnel Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$170,242		

Additional Narrative

- Gina Cumbo, Vice President, Innovation & Impact, is responsible for leading CCYJ's program and policy initiatives, supporting contract and subaward development and compliance, and developing high performing teams.
- Afsaneh Haddadain, Program Manager, is responsible for day-to-day LINC program management, administration, evaluation, and partner training/professional development.
- William "Billy" Hairston, Director of Impact, is responsible for strategic program leadership and fiscal oversight. He drives strategic vision and planning, policy change, partnership development, and sustainability for CCYJ's CVI initiatives.
- Tiffany Martindale, Monitoring & Evaluation Specialist, provides data analysis, monitoring, and reporting for LINC's process and outcome evaluation and strategic plan metrics.
- Fredericka "Freddie" Pie, Associate Director, is responsible for day-to-day program leadership and partner engagement for CCYJ's CVI initiatives.
- Rachel Sottile, Executive Director, is a member of the LINC Steering Committee and manages relationships with leadership in the courts, education, child welfare, state and local government and other sectors.
- Tatianah Summers, Program Coordinator, is responsible for LINC program administration, evaluation data coordination, and MDIT facilitation.
- TBD, Grants & Contracts Specialist provides administrative support and coordination for contracts and federal grant compliance.

Year 3

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	Name	Position	Salary	Rate	Time Worked	Percentage of Time (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	VP Innovation & Impact	$143,360.00	Y	1.00	10.00%	$14,336.00	$0.00	$14,336.00
2	William Hairston	Director of Impact	$104,737.50	Y	1.00	42.00%	$43,989.75	$0.00	$43,989.75
3	Rachel Sottile	President & CEO	$200,000.00	Y	1.00	9.00%	$18,000.00	$0.00	$18,000.00
4	Tatianah Summers	Program Coordinator	$57,294.00	Y	1.00	50.00%	$28,647.00	$0.00	$28,647.00
5	Afsaneh Haddadain	Program Manager	$80,000.00	Y	1.00	60.00%	$48,000.00	$0.00	$48,000.00
6	TBD	Contract & Grants Specialist	$79,380.00	Y	1.00	3.00%	$2,381.40	$0.00	$2,381.40
7	Fredericka Pie	Associate Director of Impact	$85,500.00	Y	1.00	10.00%	$8,550.00	no value	$8,550.00
8	Tiffany Martindale	Monitoring & Evaluation Specialist	$79,380.00	Y	1.00	10.00%	$7,938.00	no value	$7,938.00

Personnel Total Cost

$171,842

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Additional Narrative

- Gina Cumbo, Vice President, Innovation & Impact, is responsible for leading CCYJ's program and policy initiatives, supporting contract and subaward development and compliance, and developing high performing teams.
- Afsaneh Haddadain, Program Manager, is responsible for day-to-day LINC program management, administration, evaluation, and partner training/professional development.
- William "Billy" Hairston, Director of Impact, is responsible for strategic program leadership and fiscal oversight. He drives strategic vision and planning, policy change, partnership development, and sustainability for CCYJ's CVI initiatives.
- Tiffany Martindale, Monitoring & Evaluation Specialist, provides data analysis, monitoring, and reporting for LINC's process and outcome evaluation and strategic plan metrics.
- Fredericka "Freddie" Pie, Associate Director, is responsible for day-to-day program leadership and partner engagement for CCYJ's CVI initiatives.
- Rachel Sottile, Executive Director, is a member of the LINC Steering Committee and manages relationships with leadership in the courts, education, child welfare, state and local government and other sectors.
- Tatianah Summers, Program Coordinator, is responsible for LINC program administration, evaluation data coordination, and MDIT facilitation.
- TBD, Grants & Contracts Specialist provides administrative support and coordination for contracts and federal grant compliance.

Fringe Benefits

Year 1

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	Name	Base	Rate (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	$14,336.00	30%	$4,300.80	$0.00	$4,300.80
2	William Hairston	$52,368.75	30%	$15,710.63	$0.00	$15,710.63
3	Rachel Sottile	$20,000.00	30%	$6,000.00	$0.00	$6,000.00
4	Ana Sneed	$36,668.16	30%	$11,000.45	$0.00	$11,000.45
5	Tiffany Martindale	$793.80	30%	$238.14	no value	$238.14
6	Fredericka Pie	$42,750.00	30%	$12,825.00	$0.00	$12,825.00
7	Katharine Gregg	$5,953.50	30%	$1,786.05	$0.00	$1,786.05

Fringe Benefits Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$51,861		

Additional Narrative

Fringe benefits total 30% of base salary. They include:

- Social security: 6.20%
- Medicare: 1.45%
- Unemployment tax (state): 2.00%
- Workers Compensation, WA FMLA: 3.00%
- Medical/Health Insurance: 11.00%
- Transportation (parking, bus card): 3.35%
- Life insurance/Accidental Death, Long/Short Term Care: 3.00%

Year 2

	Name	Base	Rate (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	$14,336.00	30%	$4,300.80	$0.00	$4,300.80
2	William Hairston	$43,989.75	30%	$13,196.93	$0.00	$13,196.93
3	Rachel Sottile	$18,000.00	30%	$5,400.00	$0.00	$5,400.00
4	Tatianah Summers	$28,647.00	30%	$8,594.10	$0.00	$8,594.10

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5	Fredericka Pie	$8,550.00	30%	$2,565.00	$0.00	$2,565.00
6	TBD Grants & Contracts Specialist	$2,381.40	30%	$714.42	$0.00	$714.42
7	Afsaneh Haddadain	$46,400.00	30%	$13,920.00	no value	$13,920.00
8	Tiffany Martindale	$7,938.00	30%	$2,381.40	no value	$2,381.40

Fringe Benefits Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$51,073		

Additional Narrative

Fringe benefits total 30% of base salary. They include:

- Social security: 6.20%
- Medicare: 1.45%
- Unemployment tax (state): 2.00%
- Workers Compensation, WA FMLA: 3.00%
- Medical/Health Insurance: 11.00%
- Transportation (parking, bus card): 3.35%
- Life insurance/Accidental Death, Long/Short Term Care: 3.00%

Year 3

	Name	Base	Rate (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	$14,336.00	30%	$4,300.80	$0.00	$4,300.80
2	William Hairston	$43,989.75	30%	$13,196.93	$0.00	$13,196.93
3	Rachel Sottile	$18,000.00	30%	$5,400.00	$0.00	$5,400.00
4	Tatianah Summers	$28,647.00	30%	$8,594.10	$0.00	$8,594.10
5	Afsaneh Haddadain	$48,000.00	30%	$14,400.00	no value	$14,400.00
6	Tiffany Martindale	$7,938.00	30%	$2,381.40	no value	$2,381.40
7	Freddie Pie	$8,550.00	30%	$2,565.00	$0.00	$2,565.00
8	TBD Grants & Contracts Specialist	$2,381.40	30%	$714.42	$0.00	$714.42

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Fringe Benefits Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$51,553		

Additional Narrative

Fringe benefits total 30% of base salary. They include:

- Social security: 6.20%
- Medicare: 1.45%
- Unemployment tax (state): 2.00%
- Workers Compensation, WA FMLA: 3.00%
- Medical/Health Insurance: 11.00%
- Transportation (parking, bus card): 3.35%
- Life insurance/Accidental Death, Long/Short Term Care: 3.00%

Travel

Year 1

	Purpose of Travel	Location	Type of Expense	Basis	Cost	Quantity	# Of Staff	# Of Trips	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Convening	Washington DC	Transportation	Round-Trip	$600.00	1.00	4.00	1.00	$2,400.00	$0.00	$2,400.00
2	Convening	Washington DC	Lodging	Night	$188.00	2.00	4.00	1.00	$1,504.00	$0.00	$1,504.00
3	Convening	Washington DC	Meals	Day	$79.00	1.00	4.00	1.00	$316.00	$0.00	$316.00
4	Convening	Seattle WA	Mileage	Mile	$0.620	254.45	4.00	2.00	$1,262.07	$0.00	$1,262.07
5	Convening	Washington, DC	Meals	Day	$59.25	1.00	4.00	1.00	$237.00	$0.00	$237.00
6	Convening	Washington, DC	Meals	Day	$59.25	1.00	4.00	1.00	$237.00	$0.00	$237.00

Travel Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$5,956		

Additional Narrative

Travel is budgeted for four staff to attend a BJA convening in Washington DC with standard airfare, hotel and per diem rates.

Local travel is budgeted for staff to attend meetings and convenings in the local Seattle/King County area at a total of 254.45 miles at standard mileage rates.

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Year 2

	Purpose of Travel	Location	Type of Expense	Basis	Cost	Quantity	# Of Staff	# Of Trips	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Convening	Washington DC	Transportation	Round-Trip	$600.00	1.00	4.00	1.00	$2,400.00	$0.00	$2,400.00
2	Convening	Washington DC	Lodging	Night	$188.00	2.00	4.00	1.00	$1,504.00	$0.00	$1,504.00
3	Convening	Washington DC	Meals	Day	$79.00	1.00	4.00	1.00	$316.00	$0.00	$316.00
4	Convening	Washington, DC	Meals	Day	$59.25	1.00	4.00	1.00	$237.00	$0.00	$237.00
5	Convening	Washington, DC	Meals	Day	$59.25	1.00	4.00	1.00	$237.00	$0.00	$237.00
6	Convening	Seattle WA	Mileage	Mile	$0.670	254.45	4.00	2.00	$1,363.85	$0.00	$1,363.85

Travel Total Cost

$6,058

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Additional Narrative

Travel is budgeted for four staff to attend a BJA convening in Washington DC with standard airfare, hotel and per diem rates.

Local travel is budgeted for staff to attend meetings and convenings in the local Seattle/King County area at a total of 254.45 miles at standard mileage rates.

Year 3

	Purpose of Travel	Location	Type of Expense	Basis	Cost	Quantity	# Of Staff	# Of Trips	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Convening	Washington DC	Transportation	Round-Trip	$600.00	1.00	4.00	1.00	$2,400.00	$0.00	$2,400.00
2	Convening	Washington DC	Lodging	Night	$188.00	2.00	4.00	1.00	$1,504.00	$0.00	$1,504.00
3	Convening	Washington DC	Meals	Day	$79.00	1.00	4.00	1.00	$316.00	$0.00	$316.00
4	Convening	Washington, DC	Meals	Day	$59.25	1.00	4.00	1.00	$237.00	$0.00	$237.00
5	Convening	Washington, DC	Meals	Day	$59.25	1.00	4.00	1.00	$237.00	$0.00	$237.00
6	Convening	Seattle WA	Mileage	Mile	$0.670	255.76	4.00	2.00	$1,370.87	$0.00	$1,370.87

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Travel Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$6,065		

Additional Narrative

Travel is budgeted for four staff to attend a BJA convening in Washington DC with standard airfare, hotel and per diem rates.

Local travel is budgeted for staff to attend meetings and convenings in the local Seattle/King County area at a total of 255.76 miles at standard mileage rates.

Equipment

Year 1

Equipment Item	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items					

Equipment Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

Year 2

Equipment Item	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items					

Equipment Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

Year 3

Equipment Item	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items					

Equipment Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

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Supplies

Year 1

	Purpose of Supply Items	# of Items	Unit Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Laptops	3.00	$1,000.00	$3,000.00	$0.00	$3,000.00
2	Monitors	3.00	$400.00	$1,200.00	$0.00	$1,200.00
3	Docking Stations	3.00	$200.00	$600.00	$0.00	$600.00
4	Laptop Cords/Adaptors	6.00	$100.00	$600.00	$0.00	$600.00
5	Training Supplies	1,000.00	$2.50	$2,500.00	$0.00	$2,500.00
6	Program Supplies	46.00	$25.00	$1,150.00	$0.00	$1,150.00

Supplies Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$9,050		

Additional Narrative

- Laptops, monitors, docking stations, laptop cord/adaptors are budgeted for three project staff.
- Training supplies include pens, paper, folders, and name tags. Training will be offered multiple times annually, including every other month for MDIT members, quarterly for Steering Committee members, and annually for a combined audience of MDIT members, Steering Committee members and community stakeholders (young people, parents/family members, community members, direct service providers and system professionals, as well as policy makers and elected officials and their staff).
- Program supplies include t-shirts for youth, program staff, steering committee members, MDIT members and community stakeholders as part of community mobilization events. Other program supplies include direct participant support supplies like clothing, household items, food, bus passes, and admission fees for educational experiences (museums, etc.).

Year 2

	Purpose of Supply Items	# of Items	Unit Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Training Supplies	200.00	$2.50	$500.00	$0.00	$500.00
2	Program Supplies	299.00	$25.08	$7,498.92	$0.00	$7,498.92
3	Monitors	1.00	$301.00	$301.00	$0.00	$301.00

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4	Docking Stations	1.00	$150.00	$150.00	$0.00	$150.00
5	Laptops	2.00	$1,222.25	$2,444.50	$0.00	$2,444.50
6	Laptop cords, adaptors	1.00	$95.50	$95.50	$0.00	$95.50

Supplies Total Cost

$10,990

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Additional Narrative

- Laptops, monitors, docking stations, laptop cord/adaptors are budgeted for one to two project staff.
- Training supplies include pens, paper, folders, and name tags. Training will be offered multiple times annually, including every other month for MDIT members, quarterly for Steering Committee members, and annually for a combined audience of MDIT members, Steering Committee members and community stakeholders (young people, parents/family members, community members, direct service providers and system professionals, as well as policy makers and elected officials and their staff.
- Program supplies include T-shirts for youth, program staff, steering committee members, MDIT members and community stakeholders as part of community mobilization events, Other program supplies include direct participant support supplies including clothing, household items, food, bus passes, and admission fees for educational experiences (museums, etc...)

Year 3

	Purpose of Supply Items	# of Items	Unit Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Training Supplies	300.00	$2.50	$750.00	$0.00	$750.00
2	Laptops	2.00	$1,222.00	$2,444.00	$0.00	$2,444.00
3	Program Supplies	285.00	$25.00	$7,125.00	$0.00	$7,125.00
4	Monitors	1.00	$301.00	$301.00	$0.00	$301.00
5	Docking Stations	1.00	$150.00	$150.00	$0.00	$150.00
6	Laptop cords, adaptors	2.00	$95.60	$191.20	$0.00	$191.20

Supplies Total Cost

$10,961

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Additional Narrative

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- Laptops, monitors, docking stations, laptop cord/adaptors are budgeted for one to two project staff.
- Training supplies include pens, paper, folders, and name tags. Training will be offered multiple times annually, including every other month for MDIT members, quarterly for Steering Committee members, and annually for a combined audience of MDIT members, Steering Committee members and community stakeholders (young people, parents/family members, community members, direct service providers and system professionals, as well as policy makers and elected officials and their staff).
- Program supplies include T-shirts for youth, program staff, steering committee members, MDIT members and community stakeholders as part of community mobilization events, Other program supplies include direct participant support supplies like clothing, household items, food, bus passes and admission fees for educational experiences (museums, etc.).

Construction

Year 1

Purpose of Construction	Description of Work	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items						

Construction Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

Year 2

Purpose of Construction	Description of Work	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items						

Construction Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

Year 3

Purpose of Construction	Description of Work	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items						

Construction Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

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SubAwards

Year 1

Item	Description	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items							

Subawards Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

Year 2

Item	Description	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items							

Subawards Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

Year 3

Item	Description	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items							

Subawards Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0		

Procurement Contracts

Year 1

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	Item	Description	Consultant	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Geo Education & Research	Community Assessment and Strategic Planning Services	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
2	Pro Se Potential	Case Management	No	United States	Washington	Seattle	$25,000.00	no value	$25,000.00

Procurement Cost

$55,000

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Consultant Travel Required

No

Consultant Travel

Purpose of Travel	Location	Type of Expense	Cost	Duration or Distance	# of Staff	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items								

Consultant Travel Total Cost

0.00

Procurement Total Cost

$55,000.00

Additional Narrative

- **Geo Education and Research** will update LINC's Community Assessment and provide Strategic Planning services and support to the LINC Steering Committee in the development of a new 3-Year LINC Strategic plan.
- **Street outreach services** will be provided by the Freedom Project and the YMCA of Greater Seattle's Alive and Free Program. Freedom Project is a culturally specific grassroots organization directed by and serving BIPOC communities impacted by mass incarceration and employing staff who are reflective of the communities served by LINC and who have lived experience. The Alive and Free Program is a community-based and culturally responsive service provider employing staff who are reflective of the communities served by LINC and who have lived experience.
- **Case management services** will be provided by Pro Se Potential. Pro Se Potential is a black lead grassroots nonprofit organization focused supporting people of color to
thrive in society.

Year 2

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	Item	Description	Consultant	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Geo Education & Research	Community Assessment & Strategic Planning Services	No	United States	Washington	Seattle	$20,000.00	$0.00	$20,000.00
2	Trainers	Training & Technical Assistance Services	No	United States	Washington	Seattle	$10,000.00	$0.00	$10,000.00
3	Table Stipends #1 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
4	Table Stipends #2 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
5	Table Stipends #3 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
6	Table Stipends #4 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
7	Table Stipends #5 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
8	Table Stipends #6 Organization	MDIT Services	No	United States	Washington	Seattle	$2,000.00	$0.00	$2,000.00
9	YMCA of Greater Seattle	Street Outreach Services	No	United States	Washington	Seattle	$149,438.50	no value	$149,438.50
10	Freedom Project	Street Outreach Services	No	United States	Washington	Seattle	$149,438.50	no value	$149,438.50
11	Pro Se Potential	Case Management Services	No	United States	Washington	Seattle	$70,646.86	no value	$70,646.86

Procurement Cost

$431,524

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Consultant Travel Required

No

Consultant Travel

Purpose of Travel	Location	Type of Expense	Cost	Duration or Distance	# of Staff	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount

No items

Consultant Travel Total Cost

0.00

Procurement Total Cost

$431,523.86

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Additional Narrative

- **Geo Education and Research** will update LINC's Community Assessment and provide Strategic Planning services and support to the LINC Steering Committee in the development of a new 3-Year LINC Strategic plan.
- **Trainers** will provide training and technical assistance on subjects of need identified by MDIT and Steering Committee members. Trainers may be engaged to present at every other month trainings for MDIT members, quarterly trainings for Steering Committee members, or annual trainings for all stakeholders. Trainers may include among others: Dr. David Lewis, Psy.D, on Trauma Informed Care and Support Factors; Eddie Purpose or Willard Jimerson on Credible Messenger mentoring model, Eleuthera Lisch on the Alive and Free Curriculum.
- **Table Stipends** are paid as vendor contracts at $5,000/organization for organizational staff to participate in MDIT table meetings and team-based case management. Providers include: 1. Consejo Youth and Family Services (culturally specific behavioral and mental health), 2. Family First Counseling (culturally specific family counseling and crisis intervention for BIPOC), 3. WAPI Community Services (culturally specific outpatient treatment for Asian American/Pacific Islander children and youth), 4. SEAMAR Community Health Centers (culturally specific behavioral health for Latinx children and youth), 5. St. Vincent DePaul Re-Route (youth programs that help prevent/divert gang involvement), 6. Progress Pushers (group mentoring services for youth)
- **Street outreach services** will be provided by the Freedom Project and the YMCA of Greater Seattle's Alive and Free Program. Freedom Project is a culturally specific grassroots organization directed by and serving BIPOC communities impacted by mass incarceration and employing staff who are reflective of the communities served by LINC and who have lived experience. The Alive and Free Program is a community-based and culturally responsive service provider employing staff who are reflective of the communities served by LINC and who have lived experience.
- **Case management services** will be provided by Pro Se Potential. Pro Se Potential is a black lead grassroots nonprofit organization focused supporting people of color to
thrive in society.

Year 3

	Item	Description	Consultant	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Table Stipends #1 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
2	Table Stipends #2 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
3	Table Stipends #3 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
4	Table Stipends #4 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
5	Table Stipends #5 Organization	MDIT Services	No	United States	Washington	Seattle	$6,000.00	$0.00	$6,000.00
6	Table Stipends #6 Organization	MDIT Services	No	United States	Washington	Seattle	$2,000.00	$0.00	$2,000.00
7	Trainers	Services	No	United States	Washington	Seattle	$5,000.00	$0.00	$5,000.00
8	Pro Se Potential	Case Management Services	No	United States	Washington	Seattle	$36,729.86	no value	$36,729.86
9	YMCA of Greater Seattle	Street Outreach Services	No	United States	Washington	Seattle	$149,438.50	no value	$149,438.50
10		Street Outreach		United					

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Freedom Project	Services	No	States	Washington	Seattle	$149,438.50	no value	$149,438.50

Procurement Cost

$372,607

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Consultant Travel Required

No

Consultant Travel

Purpose of Travel	Location	Type of Expense	Cost	Duration or Distance	# of Staff	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount

No items

Consultant Travel Total Cost

0.00

Procurement Total Cost

$372,606.86

Additional Narrative

- **Trainers** will provide training and technical assistance on subjects of need identified by MDIT and Steering Committee members. Trainers may be engaged to present at every other month trainings for MDIT members, quarterly trainings for Steering Committee members, or annual trainings for all stakeholders. Trainers may include among others: Dr. David Lewis, Psy.D, on Trauma Informed Care and Support Factors; Eddie Purpose or Willard Jimerson on Credible Messenger mentoring model, Eleuthera Lisch on the Alive and Free Curriculum.
- **Table Stipends** are paid as vendor contracts at $5,000/organization for organizational staff to participate in MDIT table meetings and team-based case management. Providers include: 1. Consejo Youth and Family Services (culturally specific behavioral and mental health), 2. Family First Counseling (culturally specific family counseling and crisis intervention for BIPOC), 3. WAPI Community Services (culturally specific outpatient treatment for Asian American/Pacific Islander children and youth), 4. SEAMAR Community Health Centers (culturally specific behavioral health for Latinx children and youth), 5. St. Vincent DePaul Re-Route (youth programs that help prevent/divert gang involvement), 6. Progress Pushers (group mentoring services for youth)
- **Street outreach services** will be provided by the Freedom Project and the YMCA of Greater Seattle's Alive and Free Program. Freedom Project is a culturally specific grassroots organization directed by and serving BIPOC communities impacted by mass incarceration and employing staff who are reflective of the communities served by LINC and who have lived experience. The Alive and Free Program is a community-based and culturally responsive service provider employing staff who are reflective of the communities served by LINC and who have lived experience.
- **Case management services** will be provided by Pro Se Potential. Pro Se Potential is a black lead grassroots nonprofit organization focused supporting people of color to
thrive in society.

Other Costs

Year 1

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	Description	Quantity	Basis	Costs	Length of Time	Total Costs	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Printing	1.00	months	$25.32	12.00	$303.84	$0.00	$303.84
2	Zoom service	1.00	months	$100.00	12.00	$1,200.00	$0.00	$1,200.00
3	Cell phone	3.00	months	$120.00	12.00	$4,320.00	$0.00	$4,320.00

Other Costs Total Cost

$5,824

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Additional Narrative

- **Printing**: Funds will be used to print and duplicate project materials including the LINC Intervention Team Manual.
- **Zoom service:** Used for conferencing with youth, families and other service providers. Also used for LINC MDIT and LINC Steering Committee meetings.
- **Cell phones:** Providing essential phone services for staff.

Year 2

	Description	Quantity	Basis	Costs	Length of Time	Total Costs	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Printing	1.00	months	$25.32	12.00	$303.84	$0.00	$303.84
2	Zoom service	1.00	months	$110.10	12.00	$1,321.20	$0.00	$1,321.20
3	Cell phone	3.00	months	$131.29	12.00	$4,726.44	$0.00	$4,726.44
4	Conference Facility Rental	1.00	months	$5,000.00	1.00	$5,000.00	no value	$5,000.00
5	Conference AV	1.00	months	$1,000.00	1.00	$1,000.00	no value	$1,000.00

Other Costs Total Cost

$12,351

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Additional Narrative

- **Printing**: Funds will be used to print and duplicate project materials including the LINC Intervention Team Manual.
- **Zoom service:** Used for conferencing with youth, families and other service providers. Also used for LINC MDIT and LINC Steering Committee meetings.

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- **Cell phones:** Providing essential phone services for staff.
- **Conference Facility and Audio Visual Rental**: for the LINC Conference, an annual professional development, training, and technical assistance convening open to partners, stakeholders, and community members.

Year 3

	Description	Quantity	Basis	Costs	Length of Time	Total Costs	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Printing	1.00	months	$25.32	12.00	$303.84	$0.00	$303.84
2	Zoom service	1.00	months	$110.10	12.00	$1,321.20	$0.00	$1,321.20
3	Cell phone	3.00	months	$131.29	12.00	$4,726.44	$0.00	$4,726.44
4	Conference Facility	1.00	months	$5,000.00	1.00	$5,000.00	no value	$5,000.00
5	Conference Audio Visual	1.00	months	$1,000.00	1.00	$1,000.00	no value	$1,000.00

Other Costs Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$12,351		

Additional Narrative

- **Printing**: Funds will be used to print and duplicate project materials including the LINC Intervention Team Manual.
- **Zoom service:** Used for conferencing with youth, families and other service providers. Also used for LINC MDIT and LINC Steering Committee meetings.
- **Cell phones:** Providing essential phone services for staff.
- **Conference Facility and Audio Visual Rental**: for the LINC Conference, an annual professional development, training, and technical assistance convening open to partners, stakeholders, and community members.

Indirect Costs

Year 1

	Description	Base	Indirect Cost Rate	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Per negotiated rate	$295,561.19	42.22%	$124,785.93	$0.00	$124,785.93

Indirect Costs Total Cost	Total Non-Federal Amt

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(Match or Prog Inc)

$124,786

Additional Narrative

Indirect is applied based on CCYJ's negotiated indirect rate, to all direct costs, excluding amounts over $25,000 for each Subaward and Procurement Contract.

Breakdown of the Modified Total Direct Costs - MTDC base used for the CCYJ indirect costs:

CCYJ uses their federally approved rate of 42.22% to calculate the IDC across the following budget lines:

- Salaries: $172,870.21
- Fringe Benefits: $51,861.06
- Travel: $5,956.07
- Supplies: $9,050.00
- Procurement Contracts: $50,000
  - GEO Research & Education (Community Assessment and Strategic Planning Services): first $25,000 of $30,000: $25,000
  - Pro Se Potential (Case Management Services): $25,000
- Other costs: $5,823.84

Year 2

	Description	Base	Indirect Cost Rate	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Per negotiated rate	$342,714.05	42.22%	$144,693.87	$0.00	$144,693.87

Indirect Costs Total Cost

$144,694

Total Non-Federal Amt (Match or Prog Inc)

Total Federal Amount

Additional Narrative

Indirect is applied based on CCYJ's negotiated indirect rate, to all direct costs, excluding amounts over $25,000 for each Subaward and Procurement Contract.

Breakdown of the Modified Total Direct Costs - MTDC base used for the CCYJ indirect costs:

CCYJ uses their federally approved rate of 42.22% to calculate the IDC across the following budget lines:

- Salaries: $170,242.15
- Fringe Benefits: $51,072.65

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- Travel: $6,057.85
- Supplies: $4,490.00
- Procurement Contracts: $92,000
  - Trainers: $10,000
  - YMCA of Greater Seattle (Street Outreach Services)- first $25,000 of $149,438.50: $25,000
  - Freedom Project (Street Outreach Services)- first $25,000 of $149,438.50: $25,000
  - Table stipends Organization 1 - $6,000
  - Table stipends Organization 2 - $6,000
  - Table stipends Organization 3 - $6,000
  - Table stipends Organization 4 - $6,000
  - Table stipends Organization 5 - $6,000
  - Table stipends Organization 6 - $2,000
- Other costs: $18,851.40

Year 3

	Description	Base	Indirect Cost Rate	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Per negotiated rate	$289,772.35	42.22%	$122,341.89	$0.00	$122,341.89

Indirect Costs Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$122,342		

Additional Narrative

Indirect is applied based on CCYJ's negotiated indirect rate, to all direct costs, excluding amounts over $25,000 for each Subaward and Procurement Contract.

Breakdown of the Modified Total Direct Costs - MTDC base used for the CCYJ indirect costs:

CCYJ uses their federally approved rate of 42.22% to calculate the IDC across the following budget lines:

- Salaries: $171,842.15
- Fringe Benefits: $51,552.65
- Travel: $6,064.87
- Supplies: $4,835.20

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- Procurement Contracts: $37,000
    - Trainers: $5,000
    - Table stipends Organization 1 - $6,000
    - Table stipends Organization 2 - $6,000
    - Table stipends Organization 3 - $6,000
    - Table stipends Organization 4 - $6,000
    - Table stipends Organization 5 - $6,000
    - Table stipends Organization 6 - $2,000
- Other costs: $18,477.48

EXHIBIT 2

Outlook

Notice of Award Termination

From Office of Justice Programs <OJP_COMMS@public.govdelivery.com>
Date Tue 4/22/2025 2:30 PM
To Rachel Sottile <RSottile@ccyj.org>

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 22, 2025

Subject: Termination of Award

Based on a careful review, the award listed immediately below is hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number: 15PBJA-22-GG-04749-MUMU

As provided, respectively, in the award itself, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800, apply to this award. Specifically, the award document provides notice of the applicability of the termination provisions in § 200.340.

This award is being terminated because it "no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice, other than pursuant to closeout responsibilities.

Effective date: April 22, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 calendar days of the date of this notice. Unless the Assistant Attorney General for the Office

of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

(End of Notice)

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EXHIBIT 3

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	CHILDREN & YOUTH JUSTICE CENTER 300 ELLIOTT AVE W STE 360
City, State and Zip:	SEATTLE, WA 98119
Recipient UEI:	LSKMGWH8QEJ9

Project Title: CCYJ BJA CVI Capacity Building Project	**Award Number:** 15PBJA-23-GK-05198-CVIP

Solicitation Title: BJA FY 23 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative

Federal Award Amount: $4,000,000.00	**Federal Award Date:** 9/28/23

Awarding Agency:	Office of Justice Programs Bureau of Justice Assistance
Funding Instrument Type:	CA

Opportunity Category: D
Assistance Listing:
16.045 - Community-Based Violence Intervention and Prevention Initiative

Project Period Start Date: 10/1/23	**Project Period End Date:** 9/30/26
Budget Period Start Date: 10/1/23	**Budget Period End Date**: 9/30/26

Project Description:
The Center for Children and Youth Justice (CCYJ) has coordinated the implementation of the Comprehensive Gang Model since 2011 in King County, Washington. CCYJ's Leadership, Intervention, and Change program is a coordinated effort to prevent and reduce community and gun violence among youth and the involvement of young people in groups and gangs.CCYJ is focusing on King County, Washington, due to the high amount of gun violence in the region, which recently saw several years of increased activity. In 2022, the King County Executive declared gun violence a public health emergency after a 2021 spike in gun violence. In 2021, there were 460 shooting victims, which was 70 percent higher than the previous year. In 2022, the number of shots fired increased by 16 percent, and shooting victims remained higher than previous years. Black men and boys remain the highest number of victims of any race/ethnicity.CCYJ is poised to support local community-based organizations (CBOs) in reducing community violence by acting as an intermediary organization and providing targeted training and technical assistance for implementing and sustaining Community Violence Intervention (CVI) strategies. For 17 years, CCYJ has led local, regional, and statewide initiatives, bringing together stakeholders from a variety of jurisdictions and disciplines. It has developed protocols and led statewide technical assistance initiatives, task forces, and steering committees, as well as overseen federal grant subrecipients.Within this proposal, CCYJ will provide TTA to up to five CBOs, who are serving youth ages 12–24 within the CVI ecosystem in King County. CCYJ will seek out grassroots and small organizations with budgets between $60,000 and $500,000 that are planning to initiate or are already operating a CVI strategy. Priority consideration will be given to culturally specific organizations. The selection process will involve assessing the organization's readiness for change, cultural responsiveness, and ability to integrate training and technical assistance into their organization to sustain efforts in the long term.CCYJ centers the voices and leadership of those most impacted by violence and the criminal justice system by actively seeking their input on program strategies.

Award Information

Application Number
GRANT13855137

Funding Instrument Type:
CA

Award Number
15PBJA-23-GK-05198-CVIP

Supplement Number
00

Award Acceptance Date
10/13/2023 02:13 PM EDT

Assistance Listings Number	Assistance Listings Program Title
16.045	Community-Based Violence Intervention and Prevention Initiative

Statutory Authority

Department of Justice Appropriations Act, 2023 (Pub. L. No. 117-328; 136 Stat. 4459, 4537); Bipartisan Safer Communities Supplemental Appropriations Act, 2022 (Pub. L. No. 117-159, 136 Stat. 1313, 1339); 28 U.S.C. 530C

Current Authorized Representative

Title of Authorized Representative
no value

Name of Authorized Representative
Rachel Sottile

Solicitation Information

Solicitation Title

2023 BJA FY 23 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative

Project Title
CCYJ BJA CVI Capacity Building Project

Project Description
The Center for Children and Youth Justice (CCYJ) has coordinated the implementation of the Comprehensive Gang Model since 2011 in King County, Washington. CCYJ's Leadership, Intervention, and Change program is a coordinated effort to prevent and reduce community and gun violence among youth and the involvement of young people in groups and gangs.CCYJ is focusing on King County, Washington, due to the high amount of gun violence in the region, which recently saw several years of increased activity. In 2022, the King County Executive declared gun violence a public health emergency after a 2021 spike in gun violence. In 2021, there were 460 shooting victims, which was 70 percent higher than the previous year. In 2022, the number of shots fired increased by 16 percent, and shooting victims remained higher than previous years. Black men and boys remain the highest number of victims of any race/ethnicity.CCYJ is poised to support local community-based organizations (CBOs) in reducing community violence by acting as an intermediary organization and providing targeted training and technical assistance for implementing and sustaining Community Violence Intervention (CVI) strategies. For 17 years, CCYJ has led local, regional, and statewide initiatives, bringing together stakeholders from a variety of jurisdictions and disciplines. It has developed protocols and led statewide technical assistance initiatives, task forces, and steering committees, as well as overseen federal grant subrecipients.Within this proposal, CCYJ will provide TTA to up to five CBOs, who are serving youth ages 12–24 within the CVI ecosystem in King County. CCYJ will seek out grassroots and small organizations with budgets between $60,000 and $500,000 that are planning to initiate or are already operating a CVI strategy. Priority consideration will be given to culturally specific organizations. The selection process will involve assessing the organization's readiness for change, cultural responsiveness, and ability to integrate training and technical assistance into their organization to sustain efforts in the long term.CCYJ centers the voices and leadership of those most impacted by violence and the criminal justice system by actively seeking their input on program strategies.

Project Budget Summary

Final Budget Clearance

This is the current budget as updated by GAM ID: GAM-586225.

	Year1	Year2	Year3	Total
Personnel	$328,857	$338,723	$348,885	$1,016,465
Fringe Benefits	$98,657	$101,617	$104,665	$304,939
Travel	$7,833	$8,083	$8,208	$24,124
Equipment	$0	$0	$0	$0
Supplies	$10,010	$3,610	$6,410	$20,030
Construction	$0	$0	$0	$0
SubAwards	$300,000	$600,000	$300,000	$1,200,000
Procurement Contracts	$220,000	$190,000	$191,956	$601,956
Other Costs	$38,577	$34,420	$34,420	$107,417
Total Direct Costs	$1,003,934	$1,276,453	$994,544	$3,274,931
Indirect Costs	$318,493	$204,044	$202,532	$725,069
Total Project Costs	$1,322,427	$1,480,497	$1,197,076	$4,000,000
Federal	$1,322,427	$1,480,497	$1,197,076	$4,000,000
Non-Federal	$0	$0	$0	$0

Budget Totals

	Total	Percentage
Total Project Cost	$4,000,000	
Federal Funds	$4,000,000	100.00%
Non-Federal Amount	$0	0.00%
Match Amount	$0	0.00%
Program Income	$0	0.00%

Budget Detail Summary View

Personnel

Year 1

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	Name	Position	Salary	Rate	Time Worked	Percentage of Time (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	VP Innovation & Impact	$143,360.00	Y	1.00	10.00%	$14,336.00	no value	$14,336.00
2	William Hairston	Director of Impact	$104,738.00	Y	1.00	20.00%	$20,947.60	no value	$20,947.60
3	Rachel Sottile	President & CEO	$200,000.00	Y	1.00	5.00%	$10,000.00	no value	$10,000.00
4	TBD1	CVI TTA Associate Director	$82,688.00	Y	1.00	100.00%	$82,688.00	no value	$82,688.00
5	TBD2	CVI TTA Coordinator	$60,638.00	Y	1.00	100.00%	$60,638.00	no value	$60,638.00
6	TBD3	TTA Web & Communications Coordinator	$60,638.00	Y	1.00	100.00%	$60,638.00	no value	$60,638.00
7	Nicholas Oakley	Director of Policy, Strategy, & Alignment	$106,943.00	Y	1.00	20.00%	$21,388.60	no value	$21,388.60
8	TBD4	Senior Accountant	$90,000.00	Y	1.00	25.00%	$22,500.00	no value	$22,500.00
9	Tiffany Martindale	Monitoring & Evaluation Specialist	$79,380.00	Y	1.00	25.00%	$19,845.00	no value	$19,845.00
10	Katharine Delo Gregg	Contracts & Grants Specialist	$79,380.00	Y	1.00	20.00%	$15,876.00	no value	$15,876.00

Personnel Total Cost

$328,857

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$328,857

Additional Narrative

TBD, Associate Director of CVI Training and Technical Assistance Manages the day-to-day implementation of the CVI Capacity Building project, ensuring project deliverables are culturally responsive and meet the particular needs of subrecipient CBOs. Manages implementation of CBO subrecipient selection, capacity needs assessment, capacity plan development, culturally specific TTA development and delivery, knowledge materials development, and transfer of knowledge and lessons learned to the field. Manages the workflow of the CVI Coordinator and the Web and Communications Coordinator. Works closely with the Monitoring & Evaluation Specialist and Contracts & Grants Specialist to ensure project milestones and deliverables are on-track. TBD, CVI TTA Coordinator Coordinates administrative aspects of CVI Capacity Building project implementation, including assessment and plan development, TTA delivery (meetings and hosted events), data collection, knowledge material development, and CBO communications and engagement. Works closely with Monitoring & Evaluation Specialist to build systems for tracking, evaluating, reflecting, and following-up on/revising TTA delivery plans. TBD, Web and Communications Coordinator Coordinates web based aspects of the CVI Capacity Building project and project communications, including managing the online resource center and developing and implementing communications strategies to transfer knowledge and lessons learned to the field. Works in collaboration with CVI Capacity Building project team members to develop content for project knowledge products and communications. Nicholas Oakley, Director of Policy, Strategy, and Alignment Collaborates with the Director of Impact to design and implement Capacity Development Plan creation processes. Supports the provision of culturally specific TTA to participating subrecipient CBOs, including integration of best practices for adult learning and systems transformation. Develops and implements strategy for public policy and public education work, translating lessons learned into necessary policy, practice, and systems changes. William Hairston, Director of Impact Leads the CVI Capacity Building project, assuring the delivery of effective, efficient, and culturally specific TTA services designed to enhance CBO capacity to implement and lead CVI

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strategies, including activities to build capacity to seek and manage funding and sustain efforts long term. Ensures project efforts are community-centered and equity focused. Develops understanding between government systems and CBOs. Oversees and supports efforts to translate knowledge and lessons learned to the field, including policy and systems change solutions to remove barriers to CVI implementation. Gina Cumbo, Vice President of Innovation and Impact Leads CCYJ's work as an intermediary organization. Oversees the integration of CCYJ's CVI programmatic, TTA, organizational development, monitoring and evaluation, and grants and contracts compliance work. Ensures responsible and effective administration of subawards to CBOs, including ensuring that legal compliance, organizational, administrative, public policy, and programmatic structures function collaboratively and efficiently. Rachel Sottile, President and CEO Leads CCYJ's systems change work. Oversees and supports CCYJs coordination and collaboration with systems and CBO leadership to promote organizational and systems transformation. Leads organizational change, culture building, and communication capacity building work within CCYJ. Brings deep experience and expertise building out web-based training and technical assistance platforms. Katharine Delo Gregg, Contracts and Grants Specialist Manages development and implementation of subaward processes, ensuring responsible and effective administration of subawards to CBOs. Liaisons between/among CCYJ, CBOs, and government agencies and systems. Collaborates with Senior Accountant to oversee federal financial and grants award compliance with support from the Vice President of Innovation and Impact and the Vice President of Mission Support Services. Builds strong oversight and compliance systems. Tiffany Martindale, Monitoring and Evaluation Specialist Designs and implements capacity assessment, tracking, evaluation, and follow-up systems for CVI Capacity Building project, including systems and protocols for collecting, aggregating, analyzing, and reflecting on data. Builds capacity to infuse race equity in performance and impact measurement. TBD, Senior Accountant Engages and walks alongside CBO subrecipient organizations as they undergo risk assessments, desk audits, and submit invoices and backup. Supports and engages with subrecipients to build their financial and accounting systems literacy and capacity, providing one-on-one mentoring or coaching as needed.

Year 2

	Name	Position	Salary	Rate	Time Worked	Percentage of Time (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	VP Innovation & Impact	$147,660.80	Y	1.00	10.00%	$14,766.08	no value	$14,766.08
2	William Hairston	Director of Impact	$107,880.14	Y	1.00	20.00%	$21,576.03	no value	$21,576.03
3	Rachel Sottile	President & CEO	$206,000.00	Y	1.00	5.00%	$10,300.00	no value	$10,300.00
4	TBD1	CVI TTA Associate Director	$85,168.64	Y	1.00	100.00%	$85,168.64	no value	$85,168.64
5	TBD2	CVI TTA Coordinator	$62,457.14	Y	1.00	100.00%	$62,457.14	no value	$62,457.14
6	TBD3	TTA Web & Communications Coordinator	$62,457.14	Y	1.00	100.00%	$62,457.14	no value	$62,457.14
7	Nicholas Oakley	Director of Policy, Strategy, & Alignment	$110,151.29	Y	1.00	20.00%	$22,030.26	no value	$22,030.26
8	TBD4	Senior Accountant	$92,700.00	Y	1.00	25.00%	$23,175.00	no value	$23,175.00
9	Tiffany Martindale	Monitoring & Evaluation Specialist	$81,761.40	Y	1.00	25.00%	$20,440.35	no value	$20,440.35
10	Katharine Delo Gregg	Contracts & Grants Specialist	$81,761.40	Y	1.00	20.00%	$16,352.28	no value	$16,352.28

Personnel Total Cost

Total Non-Federal Amt

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$338,723	(Match or Prog Inc) $0	$338,723

Additional Narrative

TBD, Associate Director of CVI Training and Technical Assistance Manages the day-to-day implementation of the CVI Capacity Building project, ensuring project deliverables are culturally responsive and meet the particular needs of subrecipient CBOs. Manages implementation of CBO subrecipient selection, capacity needs assessment, capacity plan development, culturally specific TTA development and delivery, knowledge materials development, and transfer of knowledge and lessons learned to the field. Manages the workflow of the CVI Coordinator and the Web and Communications Coordinator. Works closely with the Monitoring & Evaluation Specialist and Contracts & Grants Specialist to ensure project milestones and deliverables are on-track. TBD, CVI TTA Coordinator Coordinates administrative aspects of CVI Capacity Building project implementation, including assessment and plan development, TTA delivery (meetings and hosted events), data collection, knowledge material development, and CBO communications and engagement. Works closely with Monitoring & Evaluation Specialist to build systems for tracking, evaluating, reflecting, and following-up on/revising TTA delivery plans. TBD, Web and Communications Coordinator Coordinates web based aspects of the CVI Capacity Building project and project communications, including managing the online resource center and developing and implementing communications strategies to transfer knowledge and lessons learned to the field. Works in collaboration with CVI Capacity Building project team members to develop content for project knowledge products and communications. Nicholas Oakley, Director of Policy, Strategy, and Alignment Collaborates with the Director of Impact to design and implement Capacity Development Plan creation processes. Supports the provision of culturally specific TTA to participating subrecipient CBOs, including integration of best practices for adult learning and systems transformation. Develops and implements strategy for public policy and public education work, translating lessons learned into necessary policy, practice, and systems changes. William Hairston, Director of Impact Leads the CVI Capacity Building project, assuring the delivery of effective, efficient, and culturally specific TTA services designed to enhance CBO capacity to implement and lead CVI strategies, including activities to build capacity to seek and manage funding and sustain efforts long term. Ensures project efforts are community-centered and equity focused. Develops understanding between government systems and CBOs. Oversees and supports efforts to translate knowledge and lessons learned to the field, including policy and systems change solutions to remove barriers to CVI implementation. Gina Cumbo, Vice President of Innovation and Impact Leads CCYJ's work as an intermediary organization. Oversees the integration of CCYJ's CVI programmatic, TTA, organizational development, monitoring and evaluation, and grants and contracts compliance work. Ensures responsible and effective administration of subawards to CBOs, including ensuring that legal compliance, organizational, administrative, public policy, and programmatic structures function collaboratively and efficiently. Rachel Sottile, President and CEO Leads CCYJ's systems change work. Oversees and supports CCYJs coordination and collaboration with systems and CBO leadership to promote organizational and systems transformation. Leads organizational change, culture building, and communication capacity building work within CCYJ. Brings deep experience and expertise building out web-based training and technical assistance platforms. Katharine Delo Gregg, Contracts and Grants Specialist Manages development and implementation of subaward processes, ensuring responsible and effective administration of subawards to CBOs. Liaisons between/among CCYJ, CBOs, and government agencies and systems. Collaborates with Senior Accountant to oversee federal financial and grants award compliance with support from the Vice President of Innovation and Impact and the Vice President of Mission Support Services. Builds strong oversight and compliance systems. Tiffany Martindale, Monitoring and Evaluation Specialist Designs and implements capacity assessment, tracking, evaluation, and follow-up systems for CVI Capacity Building project, including systems and protocols for collecting, aggregating, analyzing, and reflecting on data. Builds capacity to infuse race equity in performance and impact measurement. TBD, Senior Accountant Engages and walks alongside CBO subrecipient organizations as they undergo risk assessments, desk audits, and submit invoices and backup. Supports and engages with subrecipients to build their financial and accounting systems literacy and capacity, providing one-on-one mentoring or coaching as needed.

Year 3

	Name	Position	Salary	Rate	Time Worked	Percentage of Time (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Gina Cumbo	VP Innovation & Impact	$152,090.62	Y	1.00	10.00%	$15,209.06	no value	$15,209.06
2	William Hairston	Director of Impact	$111,116.54	Y	1.00	20.00%	$22,223.31	no value	$22,223.31
3	Rachel Sottile	President & CEO	$212,180.00	Y	1.00	5.00%	$10,609.00	no value	$10,609.00
4	TBD1	CVI TTA Associate Director	$87,723.70	Y	1.00	100.00%	$87,723.70	no value	$87,723.70

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5	TBD2	CVI TTA Coordinator	$64,330.85	Y	1.00	100.00%	$64,330.85	no value	$64,330.85
6	TBD3	TTA Web & Communications Coordinator	$64,330.85	Y	1.00	100.00%	$64,330.85	no value	$64,330.85
7	Nicholas Oakley	Director of Policy, Strategy, & Alignment	$113,455.83	Y	1.00	20.00%	$22,691.17	no value	$22,691.17
8	TBD4	Senior Accountant	$95,481.00	Y	1.00	25.00%	$23,870.25	no value	$23,870.25
9	Tiffany Martindale	Monitoring & Evaluation Specialist	$84,214.24	Y	1.00	25.00%	$21,053.56	no value	$21,053.56
10	Katharine Delo Gregg	Contracts & Grants Specialist	$84,214.24	Y	1.00	20.00%	$16,842.85	no value	$16,842.85

Personnel Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$348,885	$0	$348,885

Additional Narrative

TBD, Associate Director of CVI Training and Technical Assistance Manages the day-to-day implementation of the CVI Capacity Building project, ensuring project deliverables are culturally responsive and meet the particular needs of subrecipient CBOs. Manages implementation of CBO subrecipient selection, capacity needs assessment, capacity plan development, culturally specific TTA development and delivery, knowledge materials development, and transfer of knowledge and lessons learned to the field. Manages the workflow of the CVI Coordinator and the Web and Communications Coordinator. Works closely with the Monitoring & Evaluation Specialist and Contracts & Grants Specialist to ensure project milestones and deliverables are on-track. TBD, CVI TTA Coordinator Coordinates administrative aspects of CVI Capacity Building project implementation, including assessment and plan development, TTA delivery (meetings and hosted events), data collection, knowledge material development, and CBO communications and engagement. Works closely with Monitoring & Evaluation Specialist to build systems for tracking, evaluating, reflecting, and following-up on/revising TTA delivery plans. TBD, Web and Communications Coordinator Coordinates web based aspects of the CVI Capacity Building project and project communications, including managing the online resource center and developing and implementing communications strategies to transfer knowledge and lessons learned to the field. Works in collaboration with CVI Capacity Building project team members to develop content for project knowledge products and communications. Nicholas Oakley, Director of Policy, Strategy, and Alignment Collaborates with the Director of Impact to design and implement Capacity Development Plan creation processes. Supports the provision of culturally specific TTA to participating subrecipient CBOs, including integration of best practices for adult learning and systems transformation. Develops and implements strategy for public policy and public education work, translating lessons learned into necessary policy, practice, and systems changes. William Hairston, Director of Impact Leads the CVI Capacity Building project, assuring the delivery of effective, efficient, and culturally specific TTA services designed to enhance CBO capacity to implement and lead CVI strategies, including activities to build capacity to seek and manage funding and sustain efforts long term. Ensures project efforts are community-centered and equity focused. Develops understanding between government systems and CBOs. Oversees and supports efforts to translate knowledge and lessons learned to the field, including policy and systems change solutions to remove barriers to CVI implementation. Gina Cumbo, Vice President of Innovation and Impact Leads CCYJ's work as an intermediary organization. Oversees the integration of CCYJ's CVI programmatic, TTA, organizational development, monitoring and evaluation, and grants and contracts compliance work. Ensures responsible and effective administration of subawards to CBOs, including ensuring that legal compliance, organizational, administrative, public policy, and programmatic structures function collaboratively and efficiently. Rachel Sottile, President and CEO Leads CCYJ's systems change work. Oversees and supports CCYJs coordination and collaboration with systems and CBO leadership to promote organizational and systems transformation. Leads organizational change, culture building, and communication capacity building work within CCYJ. Brings deep experience and expertise building out web-based training and technical assistance platforms. Katharine Delo Gregg, Contracts and Grants Specialist Manages development and implementation of subaward processes, ensuring responsible and effective administration of subawards to CBOs. Liaisons between/among CCYJ, CBOs, and government agencies and systems. Collaborates with Senior Accountant to oversee federal financial and grants award compliance with support from the Vice President of Innovation and Impact and the Vice President of Mission Support Services. Builds strong oversight and compliance systems. Tiffany Martindale, Monitoring and Evaluation Specialist Designs and implements capacity assessment, tracking, evaluation, and follow-up systems for CVI Capacity Building project, including systems and protocols for collecting, aggregating, analyzing, and reflecting on data. Builds capacity to infuse race equity in performance and impact

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measurement. TBD, Senior Accountant Engages and walks alongside CBO subrecipient organizations as they undergo risk assessments, desk audits, and submit invoices and backup. Supports and engages with subrecipients to build their financial and accounting systems literacy and capacity, providing one-on-one mentoring or coaching as needed.

Fringe Benefits

Year 1

	Name	Base	Rate (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	TBD1	$82,688.00	30%	$24,806.40	no value	$24,806.40
2	TBD2	$60,638.00	30%	$18,191.40	no value	$18,191.40
3	TBD3	$60,638.00	30%	$18,191.40	no value	$18,191.40
4	Nicholas Oakley	$21,388.60	30%	$6,416.58	no value	$6,416.58
5	William Hairston	$20,947.60	30%	$6,284.28	no value	$6,284.28
6	Gina Cumbo	$14,336.00	30%	$4,300.80	no value	$4,300.80
7	Rachel Sottile	$10,000.00	30%	$3,000.00	no value	$3,000.00
8	Katharine Delo Gregg	$15,876.00	30%	$4,762.80	no value	$4,762.80
9	Tiffany Martindale	$19,845.00	30%	$5,953.50	no value	$5,953.50
10	TBD4	$22,500.00	30%	$6,750.00	no value	$6,750.00

Fringe Benefits Total Cost

$98,657

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$98,657

Additional Narrative

CCYJ’s fringe benefits rate is calculated as a percent of salary paid as benefits. Fringe benefits total 30% of base salary. They include: Social security: 6.20%; Medicare: 1.45%; Unemployment tax (state): 2.00%; Workers Compensation, WA FMLA: 3.00%; Medical/Health Insurance: 11.00%; Transportation (parking, bus card): 3.35%; Life insurance/Accidental Death, Long/Short Term Care: 3.00%

Year 2

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	Name	Base	Rate (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	TBD1	$85,168.64	30%	$25,550.59	no value	$25,550.59
2	TBD2	$62,457.14	30%	$18,737.14	no value	$18,737.14
3	TBD3	$62,457.14	30%	$18,737.14	no value	$18,737.14
4	Nicholas Oakley	$22,030.26	30%	$6,609.08	no value	$6,609.08
5	William Hairston	$21,576.03	30%	$6,472.81	no value	$6,472.81
6	Gina Cumbo	$14,766.08	30%	$4,429.82	no value	$4,429.82
7	Rachel Sottile	$10,300.00	30%	$3,090.00	no value	$3,090.00
8	Katharine Delo Gregg	$16,352.28	30%	$4,905.68	no value	$4,905.68
9	Tiffany Martindale	$20,440.35	30%	$6,132.11	no value	$6,132.11
10	TBD4	$23,175.00	30%	$6,952.50	no value	$6,952.50

Fringe Benefits Total Cost

$101,617

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$101,617

Additional Narrative

CCYJ's fringe benefits rate is calculated as a percent of salary paid as benefits. Fringe benefits total 30% of base salary. They include: Social security: 6.20% Medicare: 1.45% Unemployment tax (state): 2.00% Workers Compensation, WA FMLA: 3.00% Medical/Health Insurance: 11.00% Transportation (parking, bus card): 3.35% Life insurance/ Accidental Death, Long/Short Term Care: 3.00%

Year 3

	Name	Base	Rate (%)	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	TBD1	$87,723.70	30%	$26,317.11	no value	$26,317.11
2	TBD2	$64,330.85	30%	$19,299.26	no value	$19,299.26
3	TBD3	$64,330.85	30%	$19,299.26	no value	$19,299.26

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4	Nicholas Oakley	$22,691.17	30%	$6,807.35	no value	$6,807.35
5	William Hairston	$22,223.31	30%	$6,666.99	no value	$6,666.99
6	Gina Cumbo	$15,209.06	30%	$4,562.72	no value	$4,562.72
7	Rachel Sottile	$10,609.00	30%	$3,182.70	no value	$3,182.70
8	Katharine Delo Gregg	$16,842.85	30%	$5,052.86	no value	$5,052.86
9	Tiffany Martindale	$21,053.56	30%	$6,316.07	no value	$6,316.07
10	TBD4	$23,870.25	30%	$7,161.08	no value	$7,161.08

Fringe Benefits Total Cost

$104,665

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$104,665

Additional Narrative

CCYJ's fringe benefits rate is calculated as a percent of salary paid as benefits. Fringe benefits total 30% of base salary. They include: Social security: 6.20% Medicare: 1.45% Unemployment tax (state): 2.00% Workers Compensation, WA FMLA: 3.00% Medical/Health Insurance: 11.00% Transportation (parking, bus card): 3.35% Life insurance/ Accidental Death, Long/Short Term Care: 3.00%

Travel

Year 1

	Purpose of Travel	Location	Type of Expense	Basis	Cost	Quantity	# Of Staff	# Of Trips	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Convening	Washington, DC	Transportation	Round-Trip	$600.00	1.00	5.00	1.00	$3,000.00	no value	$3,000.00
2	Convening	Washington, DC	Lodging	Night	$188.00	2.00	5.00	1.00	$1,880.00	no value	$1,880.00
3	Convening	Washington, DC	Meals	Day	$59.25	2.00	5.00	1.00	$592.50	no value	$592.50
4	Convening	Washington, DC	Meals	Day	$79.00	1.00	5.00	1.00	$395.00	no value	$395.00
5	Convening	Seattle	Mileage	Mile	$0.655	300.00	5.00	2.00	$1,965.00	no value	$1,965.00

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Travel Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$7,833	$0	$7,833

Additional Narrative

Travel funding supports five members of the CVI Capacity Building team to attend the required annual up-to 3-day cross-site grantee meeting referenced in the NOFO. This meeting will take place and be attended by CCYJ CVI staff during each year of the grant period. Location and timing of these meetings is TBD; lodging and meal costs were calculated using February 2023 per diem rates for Washington, DC. Round trip airfare in year one is estimated using the GSA Government YCA fare. Airfare is modestly increased in years two and three. Local travel is the foundation for providing in-person TTA opportunities. Local travel is budgeted for five staff to attend meetings in the King County area at a total of 300 miles per staff person at the standard mileage rate. Local travel is calculated by mileage at the federal standard mileage rate of 65.5 cents/mile.

Year 2

	Purpose of Travel	Location	Type of Expense	Basis	Cost	Quantity	# Of Staff	# Of Trips	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Convening	Washington, DC	Transportation	Round-Trip	$650.00	1.00	5.00	1.00	$3,250.00	no value	$3,250.00
2	Convening	Washington, DC	Lodging	Night	$188.00	2.00	5.00	1.00	$1,880.00	no value	$1,880.00
3	Convening	Washington, DC	Meals	Day	$59.25	2.00	5.00	1.00	$592.50	no value	$592.50
4	Convening	Washington, DC	Meals	Day	$79.00	1.00	5.00	1.00	$395.00	no value	$395.00
5	Convening	Seattle	Mileage	Mile	$0.655	300.00	5.00	2.00	$1,965.00	no value	$1,965.00

Travel Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$8,083	$0	$8,083

Additional Narrative

Travel funding supports five members of the CVI Capacity Building team to attend the required annual up-to 3-day cross-site grantee meeting referenced in the NOFO. This meeting will take place and be attended by CCYJ CVI staff during each year of the grant period. Location and timing of these meetings is TBD; lodging and meal costs were calculated using February 2023 per diem rates for Washington, DC. Round trip airfare in year one is estimated using the GSA Government YCA fare. Airfare is modestly increased in years two and three. Local travel is the foundation for providing in-person TTA opportunities. Local travel is budgeted for five staff to attend meetings in the King County area at a total of 300 miles per staff person at the standard mileage rate. Local travel is calculated by mileage at the federal standard mileage rate of 65.5 cents/mile.

Year 3

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	Purpose of Travel	Location	Type of Expense	Basis	Cost	Quantity	# Of Staff	# Of Trips	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Convening	Washington, DC	Transportation	Round-Trip	$675.00	1.00	5.00	1.00	$3,375.00	no value	$3,375.00
2	Convening	Washington, DC	Lodging	Night	$188.00	2.00	5.00	1.00	$1,880.00	no value	$1,880.00
3	Convening	Washington, DC	Meals	Day	$59.25	2.00	5.00	1.00	$592.50	no value	$592.50
4	Convening	Washington, DC	Meals	Day	$79.00	1.00	5.00	1.00	$395.00	no value	$395.00
5	Convening	Seattle	Mileage	Mile	$0.655	300.00	5.00	2.00	$1,965.00	no value	$1,965.00

Travel Total Cost

$8,208

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$8,208

Additional Narrative

Travel funding supports five members of the CVI Capacity Building team to attend the required annual up-to 3-day cross-site grantee meeting referenced in the NOFO. This meeting will take place and be attended by CCYJ CVI staff during each year of the grant period. Location and timing of these meetings is TBD; lodging and meal costs were calculated using February 2023 per diem rates for Washington, DC. Round trip airfare in year one is estimated using the GSA Government YCA fare. Airfare is modestly increased in years two and three. Local travel is the foundation for providing in-person TTA opportunities. Local travel is budgeted for five staff to attend meetings in the King County area at a total of 300 miles per staff person at the standard mileage rate. Local travel is calculated by mileage at the federal standard mileage rate of 65.5 cents/mile.

Equipment

Year 1

Equipment Item	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items					

Equipment Total Cost

$0

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$0

Year 2

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Equipment Item	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items					

Equipment Total Cost
$0

Total Non-Federal Amt (Match or Prog Inc)
$0

Total Federal Amount
$0

Year 3

Equipment Item	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items					

Equipment Total Cost
$0

Total Non-Federal Amt (Match or Prog Inc)
$0

Total Federal Amount
$0

Supplies

Year 1

	Purpose of Supply Items	# of Items	Unit Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Laptops	4.00	$1,000.00	$4,000.00	no value	$4,000.00
2	Tablets	3.00	$70.00	$210.00	no value	$210.00
3	Audio visual - microphones, etc.	2.00	$300.00	$600.00	no value	$600.00
4	Monitors	4.00	$400.00	$1,600.00	no value	$1,600.00
5	Docking Stations	4.00	$200.00	$800.00	no value	$800.00
6	Laptop cords, adaptors	8.00	$100.00	$800.00	no value	$800.00
7	Training Supplies (pens, paper, textbooks. etc.)	20.00	$100.00	$2,000.00	no value	$2,000.00

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Supplies Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$10,010	$0	$10,010

Additional Narrative

Laptops, Monitors, Docking Stations, Laptop Cords, & Adaptors are budgeted for the four new CVI Capacity Building staff to support staff to achieve the goals, objectives, and deliverables of the project. Tablets to support mobile field work with subrecipient CBOs, providing opportunities for TTA to direct service providers in real time and in the community where they work. Audio / Visual includes microphone recorder to present and record TTA, whether it is administered in person or online and to create knowledge products for asynchronous use as part of the online resource to support subrecipient CBOs and to transfer knowledge and lessons learned to the field. Training supplies include pens, paper, textbooks, projector, screens, flipcharts, pointers, name badges etc. to support onsite/in-person TTA. Meetings to address common issue areas across CBOs will be offered multiple times annually, including initial CVI training, monthly All Table trainings, quarterly cohort covenings/learning sessions, and the annual LINC conference. Other topical meetings may be added as needed. One-on-one meetings will be conducted periodically with each CBO, including Core Team meetings and coaching sessions.

Year 2

	Purpose of Supply Items	# of Items	Unit Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Tablets	3.00	$70.00	$210.00	no value	$210.00
2	Audio Visual - microphones, etc	2.00	$300.00	$600.00	no value	$600.00
3	Laptop cords, adaptors	8.00	$100.00	$800.00	no value	$800.00
4	Training Supplies (pens, paper, textbooks, projector, flipcharts, etc)	20.00	$100.00	$2,000.00	no value	$2,000.00

Supplies Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$3,610	$0	$3,610

Additional Narrative

Laptops, Monitors, Docking Stations, Laptop Cords, & Adaptors are budgeted for the four new CVI Capacity Building staff to support staff to achieve the goals, objectives, and deliverables of the project. Tablets to support mobile field work with subrecipient CBOs, providing opportunities for TTA to direct service providers in real time and in the community where they work. Audio / Visual includes microphone recorder to present and record TTA, whether it is administered in person or online and to create knowledge products for asynchronous use as part of the online resource to support subrecipient CBOs and to transfer knowledge and lessons learned to the field. Training supplies includes pens, paper, textbooks, projector, screens, flipcharts, pointers, name badges etc. to support onsite/in-person TTA. Meetings to address common issue areas across CBOs will be offered multiple times annually, including initial CVI training, monthly All Table trainings, quarterly cohort covenings/learning sessions, and the annual LINC conference. Other topical meetings may be added as needed. One-on-one meetings will be conducted periodically with each CBO, including Core Team meetings and coaching sessions.

Year 3

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	Purpose of Supply Items	# of Items	Unit Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Laptops	2.00	$1,000.00	$2,000.00	no value	$2,000.00
2	Monitors	2.00	$400.00	$800.00	no value	$800.00
3	Training Supplies (pens,paper, textbooks, projector, flipcharts,etc)	20.00	$100.00	$2,000.00	no value	$2,000.00
4	Tablets	3.00	$70.00	$210.00	no value	$210.00
5	Audio Visual - microphones, etc.	2.00	$300.00	$600.00	no value	$600.00
6	Laptop cords, adaptors	8.00	$100.00	$800.00	no value	$800.00

Supplies Total Cost

$6,410

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$6,410

Additional Narrative

Laptops, Monitors, Docking Stations, Laptop Cords, & Adaptors are budgeted for the four new CVI Capacity Building staff to support staff to achieve the goals, objectives, and deliverables of the project. Tablets to support mobile field work with subrecipient CBOs, providing opportunities for TTA to direct service providers in real time and in the community where they work. Audio / Visual includes microphone recorder to present and record TTA, whether it is administered in person or online and to create knowledge products for asynchronous use as part of the online resource to support subrecipient CBOs and to transfer knowledge and lessons learned to the field. Training supplies include pens, paper, textbooks, projector, screens, flipcharts, pointers, name badges etc. to support onsite/in-person TTA. Meetings to address common issue areas across CBOs will be offered multiple times annually, including initial CVI training, monthly All Table trainings, quarterly cohort covenings/learning sessions, and the annual LINC conference. Other topical meetings may be added as needed. One-on-one meetings will be conducted periodically with each CBO, including Core Team meetings and coaching sessions.

Construction

Year 1

Purpose of Construction	Description of Work	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items						

Construction Total Cost

$0

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$0

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Year 2

Purpose of Construction	Description of Work	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items						

Construction Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0	$0	$0

Year 3

Purpose of Construction	Description of Work	# of Items	Cost	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items						

Construction Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$0	$0	$0

SubAwards

Year 1

	Item	Description	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	CBO1	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00
2	CBO2	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00
3	CBO3	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00
4	CBO4	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00
5	CBO5	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00

Subawards Total Cost	Total Non-Federal Amt

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$300,000	(Match or Prog Inc)	$300,000
	$0	

Additional Narrative

Following the collaborative development of a subaward process with OJP, three to five CBOs will be selected as CVI Capacity Building project subrecipients. Selected CBOs will be small culturally responsive organizations already implementing or planning to implement at least one CVI strategy in King County, Washington. CBO subrecipients will identify needed resources as well as the capacity, readiness, and willingness to work with CCYJ throughout the project term to build their programmatic and organizational capacity to sustain CVI efforts long term.

Year 2

	Item	Description	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	CBO1	Community-based Organization	United States	Washington	Seattle	$120,000.00	no value	$120,000.00
2	CBO2	Community-based Organization	United States	Washington	Seattle	$120,000.00	no value	$120,000.00
3	CBO3	Community-based Organization	United States	Washington	Seattle	$120,000.00	no value	$120,000.00
4	CBO4	Community-based Organization	United States	Washington	Seattle	$120,000.00	no value	$120,000.00
5	CBO5	Community-based Organization	United States	Washington	Seattle	$120,000.00	no value	$120,000.00

Subawards Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$600,000	$0	$600,000

Additional Narrative

Following the collaborative development of a subaward process with OJP, three to five CBOs will be selected as CVI Capacity Building project subrecipients. Selected CBOs will be small culturally responsive organizations already implementing or planning to implement at least one CVI strategy in King County, Washington. CBO subrecipients will identify needed resources as well as the capacity, readiness, and willingness to work with CCYJ throughout the project term to build their programmatic and organizational capacity to sustain CVI efforts long term.

Year 3

	Item	Description	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	CBO1	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00
2	CBO2	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00

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3	CBO3	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00
4	CBO4	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00
5	CBO5	Community-based Organization	United States	Washington	Seattle	$60,000.00	no value	$60,000.00

Subawards Total Cost

$300,000

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$300,000

Additional Narrative

Following the collaborative development of a subaward process with OJP, three to five CBOs will be selected as CVI Capacity Building project subrecipients. Selected CBOs will be small culturally responsive organizations already implementing or planning to implement at least one CVI strategy in King County, Washington. CBO subrecipients will identify needed resources as well as the capacity, readiness, and willingness to work with CCYJ throughout the project term to build their programmatic and organizational capacity to sustain CVI efforts long term.

Procurement Contracts

Year 1

	Item	Description	Consultant	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Recognized subject matter expert 1	Recognized subject matter expert 1	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
2	Recognized subject matter expert 2	Recognized subject matter expert 2	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
3	Recognized subject matter expert 3	Recognized subject matter expert 3	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
4	Curriculum Development Support	Curriculum Development Support	No	United States	Washington	Seattle	$25,000.00	no value	$25,000.00
5	CVI Technical Expert	CVI Technical Expert	No	United States	Washington	Seattle	$25,000.00	no value	$25,000.00
6	Leadership Coach/ Trainer	Leadership Coach/ Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
7	Organization & Finance Coach/Trainer	Organization & Finance Coach/Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
8	Learning systems Coach/Trainer	Learning systems Coach/Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
9	Lived Experts	Lived Experts	No	United States	Washington	Seattle	$10,000.00	no value	$10,000.00

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10	Technical Advisors	Website support	No	United States	Washington	Seattle	$5,000.00	no value	$5,000.00
11	Website support	Website support	No	United States	Washington	Seattle	$5,000.00	no value	$5,000.00

Procurement Cost

$220,000

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$220,000

Consultant Travel Required

No

Consultant Travel

Purpose of Travel	Location	Type of Expense	Cost	Duration or Distance	# of Staff	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items								

Consultant Travel Total Cost

0.00

Procurement Total Cost

$220,000.00

Additional Narrative

CCYJ will contract with eleven entities to provide services in furtherance of the goals and objectives of the CVI Capacity Building project. Recognized Subject Matter Experts (3) As CCYJ develops knowledge products and hosts topical meetings on common issue areas identified by subrecipient CBOs, recognized subject matter experts will be engaged in pertinent subject matter areas, as needed to meet capacity building goals of the CBOs. Curriculum Development Support Specialist CCYJ will contract with a curriculum development specialist to support the design and implementation of CBO capacity development plans, ensuring that the TTA delivered is culturally specific and meets the particular learning needs of each CBO partner. CVI Technical Expert CCYJ will contract with a CVI subject matter expert to work with both our curriculum development consultant as well as CCYJ staff to ensure seamless integration of knowledge material from DOJ programs and initiatives, including, but not limited to OVC, OJJDP, and BJA programs related to CVI. Leadership Coach/Trainer, Organization & Finance Coach/Trainer, and & Learning systems Coach/Trainer CCYJ will contract with three culturally specific trainers/coaches who have expertise in the areas of CVI strategy implementation, leadership, organizational and financial systems development, to support culturally specific TTA provision to CBO subrecipients that is aligned with CBO capacity development goals and plans. Lived Experts CCYJ is committed to recognizing and amplifying the leadership of individuals with lived experience and bringing that expertise to the communities within which we work. CCYJ will contract with lived experts to enhance our TTA provision. Activities may include, giving presentations, providing feedback and advice on action plans and knowledge material development, and/or participating in interviews to illuminate challenges and barriers that could be addressed by policy and systems change efforts. Technical Advisors & Website Support CCYJ will contract with technical and web support advisors such as graphic designers and website and web application developers to ensure that our online resource center is culturally responsive, accessible, up-to-date and optimized for mobile device use.

Year 2

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	Item	Description	Consultant	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Recognized subject matter expert 1	Recognized subject matter expert 1	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
2	Recognized subject matter expert 2	Recognized subject matter expert 2	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
3	Curriculum Development Support (DCYF)	Curriculum Development Support (DCYF)	No	United States	Washington	Seattle	$25,000.00	no value	$25,000.00
4	CVI Technical Expert	CVI Technical Expert	No	United States	Washington	Seattle	$25,000.00	no value	$25,000.00
5	Leadership Coach/ Trainer	Leadership Coach/ Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
6	Organization & Finance Coach/Trainer	Organization & Finance Coach/Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
7	Learning systems Coach/Trainer	Learning systems Coach/Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
8	Lived experts	Lived experts	No	United States	Washington	Seattle	$10,000.00	no value	$10,000.00
9	Technical advisors	Technical advisors	No	United States	Washington	Seattle	$5,000.00	no value	$5,000.00
10	Website support	Website support	No	United States	Washington	Seattle	$5,000.00	no value	$5,000.00

Procurement Cost

$190,000

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$190,000

Consultant Travel Required

Yes

Consultant Travel

Purpose of Travel	Location	Type of Expense	Cost	Duration or Distance	# of Staff	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items								

Consultant Travel Total Cost

0.00

Procurement Total Cost

$190,000.00

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Additional Narrative

CCYJ will contract with eleven entities to provide services in furtherance of the goals and objectives of the CVI Capacity Building project. Recognized Subject Matter Experts (3) As CCYJ develops knowledge products and hosts topical meetings on common issue areas identified by subrecipient CBOs, recognized subject matter experts will be engaged in pertinent subject matter areas, as needed to meet capacity building goals of the CBOs. Curriculum Development Support Specialist CCYJ will contract with a curriculum development specialist to support the design and implementation of CBO capacity development plans, ensuring that the TTA delivered is culturally specific and meets the particular learning needs of each CBO partner. CVI Technical Expert CCYJ will contract with a CVI subject matter expert to work with both our curriculum development consultant as well as CCYJ staff to ensure seamless integration of knowledge material from DOJ programs and initiatives, including, but not limited to OVC, OJJDP, and BJA programs related to CVI. Leadership Coach/Trainer, Organization & Finance Coach/Trainer, and & Learning systems Coach/Trainer CCYJ will contract with three culturally specific trainers/coaches who have expertise in the areas of CVI strategy implementation, leadership, organizational and financial systems development, to support culturally specific TTA provision to CBO subrecipients that is aligned with CBO capacity development goals and plans. Lived Experts CCYJ is committed to recognizing and amplifying the leadership of individuals with lived experience and bringing that expertise to the communities within which we work. CCYJ will contract with lived experts to enhance our TTA provision. Activities may include, giving presentations, providing feedback and advice on action plans and knowledge material development, and/or participating in interviews to illuminate challenges and barriers that could be addressed by policy and systems change efforts. Technical Advisors & Website Support CCYJ will contract with technical and web support advisors such as graphic designers and website and web application developers to ensure that our online resource center is culturally responsive, accessible, up-to-date and optimized for mobile device use.

Year 3

	Item	Description	Consultant	Country	State/U.S. Territory	City	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Recognized subject matter expert 1	Recognized subject matter expert 1	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
2	Recognized subject matter expert 2	Recognized subject matter expert 2	No	United States	Washington	Seattle	$30,000.00	no value	$30,000.00
3	Curriculum Development Support (DCYF)	Curriculum Development Support (DCYF)	No	United States	Washington	Seattle	$25,000.00	no value	$25,000.00
4	CVI Technical Expert	CVI Technical Expert	No	United States	Washington	Seattle	$25,000.00	no value	$25,000.00
5	Leadership Coach/ Trainer	Leadership Coach/ Trainer	No	United States	Washington	Seattle	$26,956.00	no value	$26,956.00
6	Organization & Finance Coach/Trainer	Organization & Finance Coach/Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
7	Learning systems Coach/Trainer	Learning systems Coach/Trainer	No	United States	Washington	Seattle	$20,000.00	no value	$20,000.00
8	Lived experts	Lived experts	No	United States	Washington	Seattle	$5,000.00	no value	$5,000.00
9	Technical advisors	Technical advisors	No	United States	Washington	Seattle	$5,000.00	no value	$5,000.00
10	Website support	Website support	No	United States	Washington	Seattle	$5,000.00	no value	$5,000.00

Procurement Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$191,956	$0	$191,956

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Consultant Travel Required

Yes

Consultant Travel

	Purpose of Travel	Location	Type of Expense	Cost	Duration or Distance	# of Staff	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
No items									

Consultant Travel Total Cost	Procurement Total Cost
0.00	$191,956.00

Additional Narrative

CCYJ will contract with eleven entities to provide services in furtherance of the goals and objectives of the CVI Capacity Building project. Recognized Subject Matter Experts (3) As CCYJ develops knowledge products and hosts topical meetings on common issue areas identified by subrecipient CBOs, recognized subject matter experts will be engaged in pertinent subject matter areas, as needed to meet capacity building goals of the CBOs. Curriculum Development Support Specialist CCYJ will contract with a curriculum development specialist to support the design and implementation of CBO capacity development plans, ensuring that the TTA delivered is culturally specific and meets the particular learning needs of each CBO partner. CVI Technical Expert CCYJ will contract with a CVI subject matter expert to work with both our curriculum development consultant as well as CCYJ staff to ensure seamless integration of knowledge material from DOJ programs and initiatives, including, but not limited to OVC, OJJDP, and BJA programs related to CVI. Leadership Coach/Trainer, Organization & Finance Coach/Trainer, and & Learning systems Coach/Trainer CCYJ will contract with three culturally specific trainers/coaches who have expertise in the areas of CVI strategy implementation, leadership, organizational and financial systems development, to support culturally specific TTA provision to CBO subrecipients that is aligned with CBO capacity development goals and plans. Lived Experts CCYJ is committed to recognizing and amplifying the leadership of individuals with lived experience and bringing that expertise to the communities within which we work. CCYJ will contract with lived experts to enhance our TTA provision. Activities may include, giving presentations, providing feedback and advice on action plans and knowledge material development, and/or participating in interviews to illuminate challenges and barriers that could be addressed by policy and systems change efforts. Technical Advisors & Website Support CCYJ will contract with technical and web support advisors such as graphic designers and website and web application developers to ensure that our online resource center is culturally responsive, accessible, up-to-date and optimized for mobile device use.

Other Costs

Year 1

	Description	Quantity	Basis	Costs	Length of Time	Total Costs	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Printing	1.00	months	$113.10	12.00	$1,357.20	no value	$1,357.20
2	Hosted Conference expenses	1.00	months	$10,000.00	1.00	$10,000.00	no value	$10,000.00

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3	Learning platform software	1.00	months	$600.00	12.00	$7,200.00	no value	$7,200.00
4	Web development	1.00	months	$10,000.00	1.00	$10,000.00	no value	$10,000.00
5	Zoom	3.00	months	$100.00	12.00	$3,600.00	no value	$3,600.00
6	Cell phone	3.00	months	$120.00	12.00	$4,320.00	no value	$4,320.00
7	MobiLoud	1.00	months	$250.00	8.40	$2,100.00	no value	$2,100.00

Other Costs Total Cost

$38,577

Total Non-Federal Amt (Match or Prog Inc)

$0

Total Federal Amount

$38,577

Additional Narrative

Printing: Funds will be used to print and duplicate project materials including meeting materials and knowledge products for use in conjunction with TTA. Hosted Conference expenses may include meeting facility rental and audiovisual rental for hosting convenings in the community that bring together a cross section of CVI stakeholders for knowledge sharing, assessment, strategic planning, and reflection. Learning platform software: software necessary to build capacity for hosting online synchronous training events as well as developing asynchronous learning materials and knowledge products. Web development: software necessary to build out website and web application components of the online resource for TTA and knowledge sharing. Zoom/video conference service: used for meeting with subrecipient CBOs and providing synchronous web based TTA services. Cell phones: Providing essential phone services for staff. MobiLoud is a website to App builder, which will turn CCYJ's customized training and technical assistance website into a native mobile application.

Year 2

	Description	Quantity	Basis	Costs	Length of Time	Total Costs	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Printing	1.00	months	$150.00	12.00	$1,800.00	no value	$1,800.00
2	Hosted Conference expenses	1.00	months	$10,000.00	1.00	$10,000.00	no value	$10,000.00
3	Learning platform software	1.00	months	$600.00	12.00	$7,200.00	no value	$7,200.00
4	Web maintenance	1.00	months	$5,000.00	1.00	$5,000.00	no value	$5,000.00
5	Zoom	3.00	months	$100.00	12.00	$3,600.00	no value	$3,600.00
6	Cell phone	3.00	months	$120.00	12.00	$4,320.00	no value	$4,320.00
7	MobiLoud	1.00	months	$250.00	10.00	$2,500.00	no value	$2,500.00

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Other Costs Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$34,420	$0	$34,420

Additional Narrative

Printing: Funds will be used to print and duplicate project materials including meeting materials and knowledge products for use in conjunction with TTA. Hosted Conference expenses may include meeting facility rental and audiovisual rental for hosting convenings in the community that bring together a cross section of CVI stakeholders for knowledge sharing, assessment, strategic planning, and reflection. Learning platform software: software necessary to build capacity for hosting online synchronous training events as well as developing asynchronous learning materials and knowledge products. Web development: software necessary to build out website and web application components of the online resource for TTA and knowledge sharing. Zoom/video conference service: used for meeting with subrecipient CBOs and providing synchronous web based TTA services. Cell phones: Providing essential phone services for staff. MobiLoud is a website to App builder, which will turn CCYJ's customized training and technical assistance website into a native mobile application.

Year 3

	Description	Quantity	Basis	Costs	Length of Time	Total Costs	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Printing	1.00	months	$150.00	12.00	$1,800.00	no value	$1,800.00
2	Hosted Conference expenses	1.00	months	$10,000.00	1.00	$10,000.00	no value	$10,000.00
3	Learning platform software	1.00	months	$600.00	12.00	$7,200.00	no value	$7,200.00
4	Web maintenance	1.00	months	$5,000.00	1.00	$5,000.00	no value	$5,000.00
5	Zoom	3.00	months	$100.00	12.00	$3,600.00	no value	$3,600.00
6	Cell phone	3.00	months	$120.00	12.00	$4,320.00	no value	$4,320.00
7	MobiLoud	1.00	months	$250.00	10.00	$2,500.00	no value	$2,500.00

Other Costs Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$34,420	$0	$34,420

Additional Narrative

Printing: Funds will be used to print and duplicate project materials including meeting materials and knowledge products for use in conjunction with TTA. Hosted Conference expenses may include meeting facility rental and audiovisual rental for hosting convenings in the community that bring together a cross section of CVI stakeholders for knowledge sharing, assessment, strategic planning, and reflection. Learning platform software: software necessary to build capacity for hosting online synchronous training events as well as developing asynchronous learning materials and knowledge products. Web development: software necessary to build out website and web application components of the online resource for TTA and knowledge sharing. Zoom/video conference service: used for meeting with subrecipient CBOs and providing synchronous web

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based TTA services. Cell phones: Providing essential phone services for staff. MobiLoud is a website to App builder, which will turn CCYJ's customized training and technical assistance website into a native mobile application.

Indirect Costs

Year 1

	Description	Base	Indirect Cost Rate	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Per negotiated rate	$813,934.78	39.13%	$318,492.68	no value	$318,492.68

Indirect Costs Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$318,493	$0	$318,493

Additional Narrative

CCYJ uses their federally approved indirect cost rate of 39.13% to calculate the IDC. Modified total direct costs (MTDC) are used to calculate the base and then to determine total indirect costs. MTDC includes all direct salaries, applicable fringe benefits, travel expenses, supply costs, and the first $25,000 of each subaward and procurement contract.

Year 2

	Description	Base	Indirect Cost Rate	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Per negotiated rate	$521,452.29	39.13%	$204,044.28	no value	$204,044.28

Indirect Costs Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$204,044	$0	$204,044

Additional Narrative

CCYJ uses their federally approved indirect cost rate of 39.13% to calculate the IDC. Modified total direct costs (MTDC) are used to calculate the base and then to determine total indirect costs. MTDC includes all direct salaries, applicable fringe benefits, travel expenses, supply costs, and the first $25,000 of each subaward and procurement contract.

Year 3

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	Description	Base	Indirect Cost Rate	Total Cost	Non-Federal Amt (Match or Prog Inc)	Federal Amount
1	Per negotiated rate	$517,587.48	39.13%	$202,531.98	no value	$202,531.98

Indirect Costs Total Cost	Total Non-Federal Amt (Match or Prog Inc)	Total Federal Amount
$202,532	$0	$202,532

Additional Narrative

CCYJ uses their federally approved indirect cost rate of 39.13% to calculate the IDC. Modified total direct costs (MTDC) are used to calculate the base and then to determine total indirect costs. MTDC includes all direct salaries, applicable fringe benefits, travel expenses, supply costs, and the first $25,000 of each subaward and procurement contract.

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EXHIBIT 4

Outlook

Notice of Award Termination

From Office of Justice Programs <OJP_COMMS@public.govdelivery.com>
Date Tue 4/22/2025 2:31 PM
To Rachel Sottile <RSottile@ccyj.org>

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 22, 2025

Subject: Termination of Award

Based on a careful review, the award listed immediately below is hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number: 15PBJA-23-GK-05198-CVIP

As provided, respectively, in the award itself, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800, apply to this award. Specifically, the award document provides notice of the applicability of the termination provisions in § 200.340.

This award is being terminated because it "no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice, other than pursuant to closeout responsibilities.

Effective date: April 22, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 calendar days of the date of this notice. Unless the Assistant Attorney General for the Office

of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

(End of Notice)

You received this email because you are a current or previous Department of Justice grant applicant or award recipient. GovDelivery is providing this service on behalf of the Department of Justice and may not use your subscription information for any other purposes. For more information, review the Department of Justice Privacy Policy and the GovDelivery Privacy Policy.

This email was sent to rsottile@ccyj.org using GovDelivery Communications Cloud on behalf of Department of Justice · Washington, DC

GOVDELIVERY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,

Plaintiffs, on behalf of themselves and all others similarly situated,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

PAMELA J. BONDI, in her official capacity as United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official capacity as Acting Head of the Office of Justice Programs,

Defendants.

Case No. _____

DECLARATION OF CYNTHIA CHOI

I, Cynthia Choi, declare as follows:

1. My name is Cynthia Choi. I am a resident of Los Angeles Country in the State of California. I am over the age of eighteen. This declaration is based upon my personal knowledge and the knowledge I have acquired in the course of my duties. If called as a witness, I could and would testify competently to the matters set forth below. I provide this declaration in support of Plaintiffs' motion for preliminary injunction.

2. I am the Co-Founder of Stop AAPI Hate and the Co-Executive Director of Chinese for Affirmative Action, the fiscal sponsor for Stop AAPI Hate. I have been the Co-Founder of Stop AAPI Hate for 5 years and Co-Executive Director of Chinese for Affirmative Action for 9 years and 4 months. I oversee Stop AAPI Hate's programming, communication, and fundraising, and directly

supervise the Director of Development. I am also responsible for setting the strategic direction of the coalition and ensuring that Stop AAPI Hate maintains its reputation as a national authority on hate against Asian American and Pacific Islander communities.

3. In my role, I also oversee Stop AAPI Hate's funding streams, including government contracts and grants, and the Data & Research, Policy & Advocacy, Community Care, and Strategic Communications/Public Education initiatives affected by the grant termination.

4. Prior to this position, I held senior roles at Asian Americans/Pacific Islanders in Philanthropy, Khmer Girls in Action, and The California Endowment. In September 2022, I was appointed to the California Commission on the State of Hate. The Commission works with the California Department of Civil Rights to strengthen anti-hate initiatives across California. In 2023, I also served on The Coastside Victims Fund Oversight Committee which was established to support victims and their families affected by the mass shooting in Half Moon Bay, California.

Stop AAPI Hate's Mission and Impacted Programs

5. Stop AAPI Hate is a U.S.-based non-partisan Civil Rights coalition dedicated to ending racism and discrimination against Asian Americans and Pacific Islanders (AAPIs). In response to the alarming increase in acts of hate against the AAPI community during the COVID-19 pandemic, Stop AAPI Hate was founded in March 2020 by three 501(c)(3) organizations: Chinese for Affirmative Action (CAA), AAPI Equity Alliance, and San Francisco State University (Asian American Studies Department), with CAA as the lead fiscal agency.

6. Over the course of five years, Stop AAPI Hate has become the nation's largest reporting center tracking anti-AAPI hate acts. Stop AAPI Hate has given voice to nearly 12,800 AAPI community members who have experienced hate and amassed a following of nearly 400,000 supporters across email and social media platforms. Stop AAPI Hate has also provided critical support to victims of hate around the country.

7. Consistent with its mission, Stop AAPI Hate has addressed anti-AAPI Hate through four main strategic areas: Data and Research, Policy and Advocacy, Strategic Communications, and Community Care. The organization has brought mainstream visibility to AAPI discrimination in a way that no other organization has before.

8. Since its founding in 2020, Stop AAPI Hate has become nationally known as the primary source of data and research on acts of hate against the AAPI communities in the country. Our reporting center is widely recognized as the largest national reporting center[1] and fills a critical gap in knowledge about anti-AAPI hate, which research shows is chronically underreported to law enforcement and other government agencies. Stop AAPI Hate also conducts the most comprehensive national survey on AAPI experiences of hate and discrimination. To date, we have recorded nearly 12,800 hate acts across the country.

9. Not only does our data and research center act as a resource for thousands of AAPIs, but our data is also used by researchers, government agencies, and elected officials annually to help raise public awareness and advocate for policies that effectively address anti-AAPI hate. It has been cited by the U.S. Commission on Civil Rights, the California Commission on the State of Hate, in testimony before Congress, and before the United Nations.[2] And when Stop AAPI Hate is mentioned in articles—nearly 430,000 times, and counting—most cite to the organization's data, making Stop AAPI one of the most widely known sources of information on anti-AAPI hate in the country.

10. The national visibility that Stop AAPI Hate has brought to the issue of hate and discrimination against the AAPI community has shaped policy, prompted legislatures to make historic

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[1] *Making sense of anti-AANHPI hate: A synthesis of evidence from 2020-2024*, AAPI Data (Jan. 17, 2025), https://aapidata.com/wp-content/uploads/2025/01/Hate-Synthesis-Report-Final.pdf.

[2] *Commission on the State of Hate Report 2022-2023* (California), AAPI Data (July 19, 2024), https://aapidata.com/data/commission-on-the-state-of-hate-report-2022-2023-california/?utm_source=chatgpt.com; *UN chief 'profoundly concerned' over rise in violence against Asians*, UN News (Mar. 22, 2021), https://news.un.org/en/story/2021/03/1088002; *The Federal Response to Anti-Asian Racism in the United States*, U.S. Comm'n on C.R. (2023), https://www.usccr.gov/files/2023-10/fy-2023-se-report.pdf.

investments in the AAPI community, and fundamentally changed the way AAPIs are perceived in this country.

11. Through its comprehensive data collection and analysis, Stop AAPI Hate is able to identify key trends in how hate is perpetrated against the AAPI community. By helping government agencies, law enforcement, and community partners to understand where hate occurs, who is mostly commonly targeted, and what types of hate acts are most prevalent, Stop AAPI Hate improves public safety by allowing governments and communities to develop targeted strategies that protect people who need it most.

12. Stop AAPI Hate has been an active participant in the development of this lawsuit and has remained in regular communication with Plaintiffs' counsel about this case. Stop AAPI Hate is willing and able to take an active role in this litigation and to protect the interests of all members of the Class.

Termination of Grant Funding Without Notice

13. On September 23, 2024, Chinese for Affirmative Action d/b/a Stop AAPI Hate received its first federal grant award of $2,000,000 from the Bureau of Justice Assistance FY24 Community-based Approaches to Prevent and Address Hate Crime for the performance period of October 1, 2024 through September 30, 2027 (Award Number: 15PBJA-24-GG-02840-ADVA) (Stop AAPI Hate Award), attached here as Exhibit 1. Stop AAPI Hate was one of two grantees awarded funding under the program's national Civil Rights organization category.

14. Stop AAPI Hate proposed to implement "Stop AAPI Hate Community-Based Approaches to Prevent and Address Hate Crimes and/or Hate Incidents." The purpose of the grant initiative is to develop a holistic, multi-disciplinary, trauma-informed, community-based approach to documenting AAPI hate incidents and provide crisis response, care, and healing to victims of hate.

15. The key areas for activities outlined in the grant proposal include: data and research on AAPI hate incidents in partnership with AAPI communities; policy advocacy to educate, inform, and provide technical assistance to prevent anti-AAPI hate; community care to partner with communities to center healing and improve crisis response including further work on a landscape analysis of existing resources and models; and public education & digital media to sustain public education and conversations on anti-AAPI hate and scapegoating.

16. We anticipated the grant funding would result in the formation of a multidisciplinary team to develop and evaluate community-based strategies for affected individuals and communities including the establishment of partnerships with AAPI/Black, Indigenous, and People of Color organizations engaging in community care/healing work; the expansion of Community Healing Pilots; and increased awareness through media and social media engagement around AAPI hate incidents.

17. After receiving its award, and once the grant budget was approved by the Bureau of Justice, Stop AAPI Hate began to fulfill deliverables in the first quarter of 2025. To access funding, Stop AAPI Hate uses an advance payment model, which means funds are disbursed upfront from the Bureau of Justice Assistance grant award based on our approved budget or estimated cash needs. As the grantee, we must account for the use of funds through quarterly financial reporting.

18. Stop AAPI Hate withdrew $500,000 on January 27, 2025, for deliverables stated under our Data and Research, Community Care, and Public Education/Communication programs including the development of our annual report on the State of Hate, launching our healing circle for harmed individuals, and executing on digital content to raise awareness on the rise of anti-AAPI hate.

19. On April 22, 2025, at 2:30 pm, Stop AAPI Hate received an email from the Bureau of Justice Assistance purporting to terminate Stop AAPI Hate grants because the award "no longer effectuates Department priorities." The termination email went on to state that "the Department has changed its priorities with respect to discretionary grant funding to focus on, among other things,

more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrate that they no longer effectuate Department priorities." No other basis or explanation for the termination was provided. The termination email did not claim Stop AAPI Hate failed to comply with the terms or conditions of the award and did not otherwise explain why the award, with approximately $1,500,000 of funding outstanding, no longer effectuated Department priorities. A true and correct copy of the termination email is attached as Exhibit 2.

20. The termination email advised that Stop AAPI Hate could "appeal this termination in writing within 30 business days."

21. The termination email also required Stop AAPI Hate to commence "closeout and other obligations in 2 C.F.R. § 200.340(d)," including an obligation that Stop AAPI Hate "promptly refund any unobligated funds," that have been paid out, and retaining grant records for at least three years. The letter threatened that failure to meet these closeout obligations could include "appropriate enforcement actions," and "affect eligibility for future grants."

22. The closeout obligations include preparing and submitting the grant reports; terminating agreements with vendors, consultants, and partners; and submitting any remaining reimbursement requests for project and closeout expenses. Stop AAPI Hate currently has $127,557.29 in expenses incurred from April 1 to April 22, 2025, but not yet submitted for reimbursement. Stop AAPI Hate will also need to submit a performance and financial report to the DOJ by July 30, 2025, showing how the withdrawn amounts have been spent towards programs.

23. It was Stop AAPI Hate's understanding that the funds awarded by these grants would be available throughout the grant periods and that the DOJ could terminate the grants only if Stop AAPI Hate failed to comply with the terms and conditions of the award. It was *not* Stop AAPI Hate's

understanding that the DOJ could terminate these grants based on that agency's assertion that the award no longer affects agency priorities.

Reliance on Grant Funding and Termination Impact on Revenue, Operations and Employment

24. The termination of Stop AAPI Hate's award created an immediate harm and impact to not only Stop AAPI Hate's ability to maintain business and programmatic operations prescribed by the award but also denied funds to be paid to partners and contractors, impacting their ability to have the financial resources to sustain their work. As a result of the termination of Stop AAPI Hate's grant:

a. As a result of the termination of Stop AAPI Hate's award:

b. 20% of Stop AAPI Hate's staff can expect to be laid off within a year;

c. Community groups cannot rely on Stop AAPI Hate's partnership or support in response to large scale incidents of hate and violence (like mass shootings) as they have in the past;

d. Plans to establish partnerships with organizations focused on care, healing and mental health support for the AAPI community have been cancelled;

e. At least 40 victims of hate will lose the opportunity to participate in Stop AAPI Hate's healing support programs; and

f. Stop AAPI Hate cannot expand or sustain its community care programs for victims of hate crimes, policy and advocacy work promoting safer public transit systems, or renowned data collection and research on anti-AAPI hate and violence that has become a critical platform for victims and resource for policy makers, nationwide.

25. Stop AAPI Hate relied and acted upon its expectation and understanding that the DOJ would fulfill its commitment to provide $2 million in grant funding through the end of 2027. In reliance on that commitment, Stop AAPI Hate invested staff time and resources into major expansions

of our data and research work, our community care program which offers culturally responsive healing to victims of hate, our policy and advocacy work focused on improving safety on public transit, and our strategic communications work which brings national visibility to the issue of anti-AAPI hate.

26. DOJ's termination of this grant has created immense uncertainty for Stop AAPI Hate and has required Stop AAPI Hate employees to spend significant amounts of time working on responding to that chaos. Suddenly losing what we expected to be our single largest source of revenue just six months into the thirty-six-month grant commitment has now left us scrambling to fill the gap. Identifying, applying for, and securing additional funding requires months of dedicated effort—at a time when the philanthropic sector itself is under strain and demand for support far exceeds available resources. The sudden termination of the grant without any notice has given us little time to prepare a plan for dealing with steep and substantial shortfalls in revenue for the next two and a half years.

27. For 2026 and 2027, we had projected that the federal grant would be the single largest source of revenue for Stop AAPI Hate and would account for nearly a third of our revenue. The grant cancellation has already forced us to curb the collection and analysis of data on anti-AAPI hate; pull back on engagement with policymakers, journalists, and researchers; shrink the size of our healing support programs and rapid response support for victims of hate; terminate plans to form partnerships with community groups, and cancel an initiative aimed at improving safety on public transit.

28. The loss of funds deeply undermines our ability to combat racism and discrimination against Asian American and Pacific Islander communities. It jeopardizes essential services—such as such as culturally responsive care and healing for victims of hate, community-based documentation of incidents, partnerships that build local resilience, and national efforts to ensure AAPI voices are seen, heard, and protected.

29. The termination will likely force us to lay off up to 20% of our staff within a year.

30. I, along with many other leaders, have spent an enormous number of hours over the last few weeks attempting to quantify and mitigate the effects of these grant termination— time that could have been spent working to address and prevent hate and discrimination against AAPI communities

Impact on Community Care

31. DOJ's termination of these grants with no notice will seriously undermine Stop AAPI Hate's ability to provide a crucial platform for AAPI to report incidents of hate acts, access vital resources, and engage in culturally relevant healing and support. Stop AAPI Hate's commitment to community care is especially vital in times of tragedy and violence. And the grant termination severely undermines our ability to provide this type of crisis response to victims of hate and local community organizations, who so often have limited capacity during large scale incidents of hate.

32. Without federal funding, Stop AAPI Hate will be unable to provide the support that is needed by locally based AAPI organizations during large scale incidents of hate.

33. For example, working alongside local communities, we have provided support and resources to AAPI victims of hate in some of the most tragic attacks on our community, including the Atlanta spa shootings which claimed the lives of eight people including six Asian women, and the knife attack on an Asian student in Bloomington, Indiana. And in the aftermath of the devastating May 6, 2023, mass shooting at an outlet mall in North Texas—an act of far-right extremism that claimed the lives of eight people, including a three-year-old boy—Stop AAPI Hate mobilized swiftly to provide rapid response support to the local AAPI community. In response, Stop AAPI Hate partnered with local AAPI organizations to provide immediate and ongoing support, including coordination around a vigil and press conference.

34. We also facilitated connections between community leaders and a White House representative who joined the local vigil in a show of national solidarity.

35. Lily Trieu, Interim Executive Director of Asian Texans for Justice, expressed deep gratitude, stating: "All of your support and coordination was instrumental in allowing our Dallas-based organizations and communities to come together for healing and solidarity."

36. Stop AAPI Hate also relied on the DOJ grant to expand our culturally responsive healing support programs nationally.

37. Stop AAPI Hate believes healing and community care are powerful responses to hate. As a national organization, we work alongside local community-based organizations in the face of unexpected and traumatic crises (e.g., the hate-driven stabbing of an Asian student at Indiana University, and mass shooting in Allen, Texas). Our work, which centers victims of hate, focuses on developing culturally responsive approaches to healing, deepening research and understanding of approaches to healing across AAPI and other communities of color, and fostering community partnerships.

38. One participant in our healing group program shared this after completing the six-week program and receiving support from Stop AAPI Hate:

> "The benefits of participating in Stop AAPI Hate have been immeasurable. Not only has it facilitated my personal growth and development, but it has also had a positive impact on my mental health and well-being. I have experienced a noticeable improvement in my overall sense of happiness and fulfillment, as well as a reduction in feelings of stress and anxiety. One of the most remarkable aspects of Stop AAPI Hate is the sense of community and support it fosters. Being part of a group of like-minded individuals who are on a similar journey has been incredibly empowering and uplifting. The group dynamic creates a supportive and nurturing environment where we can openly share our experiences, challenges, and triumphs, knowing that we are not alone in our journey. The effectiveness of the facilitators cannot be praised enough. Their expertise, guidance, and unwavering support have been instrumental in my growth and development. They possess a unique ability to create a safe and inclusive space where participants feel heard, valued, and supported every step of the way. Their genuine passion for helping others shines through in everything they do, making a meaningful difference in the lives of all who participate."

39. With support from this grant, Stop AAPI Hate planned to expand its healing support program—which we have already successfully piloted in California—to Georgia and Texas. We also hoped to build community capacity in parts of the country where there are rapidly growing AAPI populations, but fewer mental health resources and other social services for our communities. As an organization that has documented nearly 12,800 acts of hate against the AAPI community, we understand the trauma that so many in our community live with. Unfortunately, because of the cultural bias against mental health support and the lack of culturally responsive resources, Asian American adults are 50% less likely and Pacific Islander adults are 70% less likely to receive mental health services than white adults. For our coalition, developing a successful national model for healing intervention that could be culturally responsive is central to our mission.

40. The grant termination has forced Stop AAPI Hate to curb our plans for expansion. Instead of developing programs in two states, our plans have been reduced to just one state. As a result, at least 40 victims of hate will lose the opportunity to participate in our healing support programs. We will also be unable to build capacity where mental health and other social services for AAPI communities are under resourced.

41. Beyond not being able to expand the program widely, Stop AAPI Hate is unable to develop a training curriculum that would have allowed us to share this as a model for other AAPI community groups. The grant cancellation has also forced us to cancel plans to establish partnerships with organizations that focus on healing in the AAPI community and other communities of color. These partnerships are critical to Stop AAPI Hate's strategy of building community capacity to respond to acts of hate with effective and culturally responsive strategies for healing. The loss of these partnerships not only hurts Stop AAPI Hate but also harms the AAPI community, which lacks investment in healing and mental health support.

42. By preventing us from expanding a culturally responsive healing program, this grant termination will ultimately hurt victims of AAPI hate the most, who so often struggle with the trauma alone.

Impact on Data and Research

43. The grant termination undermines Stop AAPI Hate's ability to collect information about acts of hate, uplift trends and hate act reports in real time, and significantly curbs our ability to provide information to researchers, community partners, government agencies, and journalists. The termination also undercuts our ability to collect information and produce research about the experiences of Pacific Islander communities–a group that is often overlooked when lumped together with Asian Americans in research studies. Specifically, the termination undercuts our data and research in three ways:

44. First, the termination undermines our ability to sustain the Stop AAPI Hate Reporting Center, which is currently the largest reporting center in the country on anti-AAPI hate acts. Research shows that just one-third of Asian hate crime victims report the incident to the police.[3] The result is that most AAPI experiences of hate are not accurately reflected in the FBI Hate Crimes Report. As a trusted community reporting center, Stop AAPI Hate fills a critical gap—receiving stories of AAPIs who experience traumatic hate acts through our reporting center, and bringing visibility to the stories of the thousands of Asian Americans and Pacific Islanders who don't feel comfortable reporting to government agencies.

45. For example, one parent of a Central Asian, school-aged girl reported the following: "My daughter has been a victim of systematic and continuous racist bullying, discrimination, and

[3] Brendan Lantz1 & Marin R. Wenger, *Are Asian Victims Less Likely to Report Hate Crime Victimization to the Police? Implications for Research and Policy in the Wake of the COVID-19 Pandemic,* 68 Crime & Delinq. 1292 (2022), https://journals.sagepub.com/doi/pdf/10.1177/00111287211041521.

harassment between 2023-2024. The school's principal covered up for the bully … My child … became suicidal. The school intentionally withheld information that it was racist bullying." Another Indian woman in Virginia reported that "the neighbor below us has been targeting us in ways that have made us feel unsafe … She has verbally harassed us multiple times … She called both the police and animal control on us. She is also taking photos of us and our home without our permission. On top of that, she's using her position on the community board to intimidate us. It's been incredibly stressful and scary for us."

46. Stop AAPI Hate has long served as a crucial platform for reporting these incidents. But without federal funding, we are no longer able to provide the level of support our community members deserve and have come to rely on.

47. The grant termination limits staffing capacity to collect, analyze, and amplify acts of hate in real time, which is key to protecting public safety. At a time when hate against our community remains alarmingly high, the need for real time reporting on trends is critical for fortifying community safety. It allows Stop AAPI Hate to provide actionable data to communities that empowers them to respond to emerging threats and protect people where they are most vulnerable. But the production of real-time monitoring and analysis is labor intensive. This must be done on a near daily basis, and each report submitted to the Stop AAPI Hate reporting center requires painstaking analysis including coding, review by multiple analysts, and sometimes supplemental interviews. Because of how labor intensive the reporting center analysis is, providing real-time monitoring and analysis has been cost prohibitive. Stop AAPI Hate had planned to use grant funding to increase staff capacity necessary for this work.

48. The cancellation also undermines our ability to provide research and analysis that researchers, community partners, government agencies, and journalists across the nation who rely on us for insights and policy making. In 2024, we worked with 19 researchers, 17 government agencies,

and 16 elected officials. But without federal funding, our ability to distribute and disseminate findings, to provide briefings, and to offer individualized technical assistance will be seriously undermined.

49. Second, the loss of the federal grant undermines Stop AAPI Hate's annual survey efforts. The Stop AAPI Hate annual survey is the most comprehensive annual national survey conducted on anti-AAPI hate. It is conducted on a calendar year basis to be able to provide year-to-year trends that can be compared with other annual measures. It is a go-to number for policymakers trying to understand the extent of anti-AAPI hate.

50. We hoped to produce the survey and annual report for three successive years–in 2025, 2026 and 2027. But now that the grant has been abruptly terminated, our ability to devote staff time to collect, analyze, produce, and distribute comprehensive annual surveys and reports in 2026 and 2027 is undermined.

51. The loss of funding specifically affects our ability to conduct comprehensive annual surveys, which are meant to include a large battery of questions not just on the experience of hate but on the support needed by communities, on barriers to reporting, and on the actions individuals have taken in response to hate. For example, through the annual survey, Stop AAPI Hate was able to determine that only around one-third of AAPI respondents who experienced hate in 2024 reported it to a formal agency or authority. That is a crucial insight for policymakers who are struggling to understand the size and scope of the problem, and who are interested in learning how to make government agencies more accessible to AAPI communities.

52. The grant termination also impedes our ability to disaggregate survey data in a meaningful way. This is crucial in the AAPI community which is composed of more than 95 distinct ethnic groups with unique cultural experiences and needs. The funding would have allowed us to oversample smaller ethnic groups that are often overshadowed by larger ethnic groups. This type of oversampling has allowed us to uncover the fact that Pacific Islanders experienced more physical harm

than East Asian, South Asian, and Southeast Asian groups. The funding loss undermines our ability to conduct oversamples and glean crucial insights that could help to inform policy that addresses the unique needs of smaller ethnic groups.

53. Third, the termination undercuts our ability to collect information and produce research about the experiences of Pacific Islander communities–a group that has is often overlooked when lumped together with Asian Americans in research studies

54. We had planned to design and execute a large-scale qualitative study of how Pacific Islander communities experience hate in partnership with community groups. Through community engagement, Stop AAPI Hate has learned that Pacific Islander experiences of hate differ from those of Asian Americans and planned to conduct a major study to fully understand these differences. Unless we can find other funding, this large-scale study will likely have to be cancelled or significantly scaled back.

55. In concert with this study, we had planned to provide data to researchers, community partners, government agencies and journalists to bring visibility to how hate affects Pacific Islander communities. Without this funding, Stop AAPI Hate will not be able to conduct the outreach and engagement necessary to bring this data to life for people who study hate, support directly impacted people, and formulate policy. This is a disservice to the Pacific Islander community whose experiences are so often overlooked.

Impact on Public Transit Safety

56. The termination of the federal grant undermines our ability to create a Public Transit Safety Toolkit that would improve safety on public transit. About 12% of the anti-AAPI hate reports to Stop AAPI Hate describe a hate act on public transit, and the reports, particularly those from AAPI women, describe verbal harassment while waiting for public transit or riding a bus or train. Through

Stop AAPI Hate's nationally representative survey with NORC, the data is more alarming with close to 20% of AAPIs reporting experiencing hate on public transit.

57. Given the prevalence of hate on public transit, Stop AAPI Hate developed the idea for a Public Transit Safety Toolkit to share nationwide, so that individuals can make efforts to increase safety on their own local transit systems. This toolkit would include: (1) a first of its kind survey for public transit systems to measure street harassment on their systems, created by the Mineta Transportation Institute at San Jose State University; (2) model legislation that requires a public transit system to measure street harassment at their stations/stops and vehicles, and develop and implement a plan to reduce it; and (3) Know Your Rights resources on rider rights, including equal access to public transit and available complaint processes. We also developed ideas for distributing the Public Transit Safety Toolkit, including partner briefings with AAPI partner organizations and transit advocacy organizations across the country.

58. Without the grant, Stop AAPI Hate is unable to implement the Public Transit Safety Toolkit because we have limited staff capacity to develop and produce the toolkit, conduct community outreach, and distribute and promote the toolkit. As a result, we will not be able to provide this useful resource to AAPI communities, who we know are experiencing hate as they ride buses or trains to work, school, hospitals, and go about their daily lives.

Impact on Reputation

59. Stop AAPI Hate will also sustain reputation harm because of this grant termination, which will undermine our ability to attract future funding. Data and research are core to our mission. The sudden termination of what was expected to be a three-year grant undermines our ability to maintain Stop AAPI Hate as the premier national clearinghouse on hate against our community.

60. This hit to Stop AAPI Hate's reputation threatens to diminish us in the eyes of other funders and individual donors who are worried about investing in an organization that has lost a

significant portion of its revenue. As a young organization, founded just 5 years ago, this was Stop AAPI Hate's first federal grant. We had counted on the grant to build credibility and secure additional support from state and local governments and philanthropic organizations. Stop AAPI Hate anticipated sustaining the work through the three-year grant period, and planned to apply for future federal funding, but those Request for Proposal opportunities have now been cancelled.

Signature on following page.

Date: May 21, 2025



Cynthia Choi
Co-Founder of Stop AAPI Hate & Co-Executive Director of Chinese for Affirmative Action
Los Angeles, California

EXHIBIT 1

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	CHINESE FOR AFFIRMATIVE ACTION 17 WALTER U. LUM PLACE
City, State and Zip:	SAN FRANCISCO, CA 94108
Recipient UEI:	C195XW2BABF9

Project Title: Stop AAPI Hate Community-Based Approaches to Prevent and Address Hate Crimes and/or Hate Incidents	**Award Number:** 15PBJA-24-GG-02840-ADVA
Solicitation Title: BJA FY24 Community-based Approaches to Prevent and Address Hate Crime	
Federal Award Amount: $2,000,000.00	**Federal Award Date:** 9/23/24
Awarding Agency: Office of Justice Programs Bureau of Justice Assistance	
Funding Instrument Type: Grant	
Opportunity Category: D **Assistance Listing:** 16.047 - Community-Based Approaches to Advancing Justice	
Project Period Start Date: 10/1/24	**Project Period End Date:** 9/30/27
Budget Period Start Date: 10/1/24	**Budget Period End Date**: 9/30/27

Project Description:

Stop Asian American and Pacific Islander (AAPI) Hate proposes to implement Stop AAPI Hate Community-Based Approaches to Prevent and Address Hate Crimes and/or Hate Incidents. The purpose is to develop a holistic, multi-disciplinary, trauma-informed, community-based approach to documenting AAPI hate incidents and provide crisis response, care and healing to those individuals and communities affected by hate incidents. Key areas for activities include: data and research on AAPI hate incidents in partnership with AAPI communities; policy advocacy to educate, inform, and provide technical assistance to prevent anti-AAPI hate; community care to partner with communities to center healing and improve crisis response including further work on a landscape analysis of existing resources and models; and strategic communications & digital media to sustain public education and conversations on anti-AAPI hate and scapegoating.

Expected outcomes include the formation of a multidisciplinary team to develop and evaluate community-based strategies for affected individuals and communities including: the establishment of partnerships with AAPI/Black, Indigenous, and People of Color organizations engaging in community care/healing work; the expansion of Community Healing Pilots; and increased awareness through media and social media engagement around AAPI hate incidents.

Award Letter

September 23, 2024

Dear JOHN FONG,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by CHINESE FOR AFFIRMATIVE ACTION for an award under the funding opportunity entitled 2024 BJA FY24 Community-based Approaches to Prevent and Address Hate Crime. The approved award amount is $2,000,000.
Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Brent J. Cohen
Acting Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) enforces federal civil rights laws and other provisions that prohibit discrimination by recipients of federal financial assistance from OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW).

Several civil rights laws, including Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance (recipients) to give assurances that they will comply with those laws. Taken together, these and other civil rights laws prohibit recipients from discriminating in the provision of services and employment because of race, color, national origin, religion, disability, and sex or from discriminating in the provision of services on the bases of age.

Some recipients of DOJ financial assistance have additional obligations to comply with other applicable nondiscrimination provisions like the Omnibus Crime Control and Safe Streets Act of 1968, which prohibits discrimination on the basis of religion in addition to race, color, national origin, and sex. Recipients may also have related requirements regarding the development and implementation of equal employment opportunity programs.

OCR provides technical assistance, training, and other resources to help recipients comply with civil rights obligations. Further, OCR administratively enforces civil rights laws and nondiscrimination provisions by investigating DOJ recipients that are the subject of discrimination complaints. In addition, OCR conducts compliance reviews of DOJ recipients based on regulatory criteria. These investigations and compliance reviews permit OCR to evaluate whether DOJ recipients are providing services to the public and engaging in employment practices in a nondiscriminatory manner.

For more information about OCR, your civil rights and nondiscrimination responsibilities, how to notify your employees or beneficiaries of their civil rights protections and responsibilities and how to file a complaint, as well as technical assistance, training, and other resources, please visit www.ojp.gov/program/civil-rights-office/outreach. If you would like OCR to assist you in fulfilling your civil rights or nondiscrimination responsibilities, please contact us at askOCR@ojp.usdoj.gov or www.ojp.gov/program/civil-rights-office/about#ocr-contacts.

Memorandum Regarding NEPA

NEPA Letter Type
OJP - Categorical Exclusion

NEPA Letter

Awards under this program will use funding to support efforts to increase the capacity of police departments or prosecutors' offices to combat violent crime in their jurisdictions. None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third-party action:

(1) New construction

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species

(3) A renovation that will change the basic prior use of a facility or significantly change its size

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment

(5) Implementation of a program involving the use of chemicals (including the identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion. Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or Orbin Terry, Environmental Coordinator for the Bureau of Justice Assistance.

NEPA Coordinator

First Name	Middle Name	Last Name
Orbin		Terry

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
CHINESE FOR AFFIRMATIVE ACTION

UEI
C195XW2BABF9

Street 1
17 WALTER U. LUM PLACE

Street 2

City
SAN FRANCISCO

State/U.S. Territory
California

Zip/Postal Code
94108

Country
United States

County/Parish
no value

Province
no value

Award Details

Federal Award Date
9/23/24

Award Type
Initial

Award Number
15PBJA-24-GG-02840-ADVA

Supplement Number
00

Federal Award Amount
$2,000,000.00

Funding Instrument Type
Grant

Assistance Listing Number	Assistance Listings Program Title
16.047	Community-Based Approaches to Advancing Justice

Statutory Authority

Department of Justice Appropriations Act, 2024 (Pub. L. No. 118-42, 138 Stat. 25, 149)

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title

2024 BJA FY24 Community-based Approaches to Prevent and Address Hate Crime

Awarding Agency
OJP

Program Office
BJA

Application Number
GRANT14164116

Grant Manager	Phone Number	E-mail Address
Letha Bell	202-702-8112	Letha.Bell@usdoj.gov

Project Title
Stop AAPI Hate Community-Based Approaches to Prevent and Address Hate Crimes and/or Hate Incidents

Performance Period Start Date	Performance Period End Date
10/01/2024	09/30/2027

Budget Period Start Date	Budget Period End Date
10/01/2024	09/30/2027

Project Description

Stop Asian American and Pacific Islander (AAPI) Hate proposes to implement Stop AAPI Hate Community-Based Approaches to Prevent and Address Hate Crimes and/or Hate Incidents. The purpose is to develop a holistic, multi-disciplinary, trauma-informed, community-based approach to documenting AAPI hate incidents and provide crisis response, care and healing to those individuals and communities affected by hate incidents. Key areas for activities include: data and research on AAPI hate incidents in partnership with AAPI communities; policy advocacy to educate, inform, and provide technical assistance to prevent anti-AAPI hate; community care to partner with communities to center healing and improve crisis response including further work on a landscape analysis of existing resources and models; and strategic communications & digital media to sustain public education and conversations on anti-AAPI hate and scapegoating.

Expected outcomes include the formation of a multidisciplinary team to develop and evaluate community-based strategies for affected individuals and communities including: the establishment of partnerships with AAPI/Black, Indigenous, and People of Color organizations engaging in community care/healing work; the expansion of Community Healing Pilots; and increased awareness through media and social media engagement around AAPI hate incidents.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Condition 1
Meaningful access requirement for individuals with limited English proficiency

The recipient, and any subrecipient at any tier, must take reasonable steps to ensure that individuals with limited English proficiency (LEP) have meaningful access to their programs and activities to comply with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of national origin, including discrimination against individuals with LEP. Such steps may require providing language assistance services, such as interpretation or translation services. The Department of Justice guidance on compliance with this requirement may be found at "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (67 Fed. Reg. 41455-41472) (https://www.federalregister.gov/d/02-15207) and is incorporated by reference here.

Condition 2
Compliance with general appropriations-law restrictions on the use of federal funds (FY 2024)
The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions that may be set out in applicable appropriations acts are indicated at https://ojp.gov/funding/Explore/FY24AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

Condition 3
Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

Condition 4
Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

Condition 5
Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this award from OJP.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

Condition 6
Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

Condition 7
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38.

Among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38 also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

Recipients and subrecipients that provide social services under this award must give written notice to beneficiaries and prospective beneficiaries prior to the provision of services (if practicable) which shall include language substantially similar to the language in 28 CFR Part 38, Appendix C, sections (1) through (4). A sample written notice may be found

at https://www.ojp.gov/program/civil-rights-office/partnerships-faith-based-and-other-neighborhood-organizations.

In certain instances, a faith-based or religious organization may be able to take religion into account when making hiring decisions, provided it satisfies certain requirements. For more information, please see https://www.ojp.gov/funding/explore/legaloverview2024/civilrightsrequirements.

Condition 8
Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

Condition 9
Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

Condition 10
Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

Condition 11
Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

Condition 12
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

Among other items, 28 C.F.R. § 42.106(d), 28 C.F.R. § 42.405(c), and 28 C.F.R. § 42.505(f) contain notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

Condition 13
Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

Condition 14
Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

Condition 15
Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

Condition 16
Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

Condition 17
Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

Condition 18
Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or

subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

Condition 19
OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

Condition 20
Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

Condition 21
Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

Condition 22
Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

Condition 23
Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

Condition 24
Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

Condition 25
Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

Condition 26
Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

Condition 27
Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

Condition 28
Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety,” OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient (“subgrantee”) at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the “controlled equipment” list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition: Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

Condition 29
Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

Condition 30
All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

Condition 31
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

Among other items, 28 C.F.R. § 54.140 contains notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

Condition 32
The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

Condition 33
Verification and updating of recipient contact information

The recipient must verify its Grant Award Administrator, Financial Manager, and Authorized Representative contact information in JustGrants, including telephone number and e-mail address. If any information is incorrect or has changed, the award recipient’s Entity Administrator must make changes to contact information through DIAMD. Instructions on how to update contact information in JustGrants can be found at https://justicegrants.usdoj.gov/training/

training-entity-management.

Condition 34
FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

Condition 35
The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJA's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).

Condition 36
The recipient agrees to submit to BJA for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award at least thirty (30) working days prior to the targeted dissemination date. The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities. Any products developed under this award, (with the exception of press releases, web sites, and mobile applications), shall contain the following statements: “This project was supported by Grant No. <Award_Number> awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." (Note: A separate disclaimer has been developed and is required for web sites and mobile applications. No disclaimer is required for press releases.)

Condition 37
Any Web site that is funded in whole or in part under this award must include the following statement on the home page, on all major entry pages (i.e., pages (exclusive of documents) whose primary purpose is to navigate the user to interior content), and on any pages from which a visitor may access or use a Web-based service, including any pages that provide results or outputs from the service: "This Web site is funded in whole or in part through a grant from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)." The full text of the foregoing statement must be clearly visible on the home page. On other pages, the statement may be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

Condition 38
Confidentiality of data

The recipient (and any subrecipient at any tier) must comply with all confidentiality requirements of 34 U.S.C. 10231 and 28 C.F.R. Part 22 that are applicable to collection, use, and revelation of data or information. The recipient further agrees, as a condition of award approval, to submit a Privacy Certificate that is in accord with requirements of 28 C.F.R. Part 22 and, in particular, 28 C.F.R. 22.23.

Condition 39
The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.

Condition 40
Protection of human research subjects

The recipient (and any subrecipient at any tier) must comply with the requirements of 28 C.F.R. Part 46 and all OJP policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.

Condition 41
Justification of consultant rate

Approval of this award does not indicate approval of any consultant rate in excess of $650 per day. A detailed justification must be submitted to and approved by the OJP program office prior to obligation or expenditure of such funds.

Condition 42
The recipient agrees that no funds under this grant award (including via subcontract or subaward, at any tier) may be used for unmanned aircraft systems (UAS), which includes unmanned aircraft vehicles (UAV), or for any accompanying accessories to support UAS.

Condition 43
The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

Condition 44
The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

Condition 45
If award funds are used for DNA testing of evidentiary materials, any resulting eligible DNA profiles must be uploaded to the Combined DNA Index System ("CODIS," the DNA database operated by the FBI) by a government DNA laboratory with access to CODIS. With the exception of Forensic Genetic Genealogy, no profiles generated under this award may be entered or uploaded into any non-governmental DNA database without prior express written approval from BJA. Award funds may not be used for the purchase of DNA equipment and supplies unless the resulting DNA profiles may be accepted for entry into CODIS. Booking agencies should work with their state CODIS agency to ensure all requirements are met for participation in Rapid DNA (see National Rapid DNA Booking Operational Procedures Manual).

Condition 46
Recipients utilizing award funds for forensic genealogy testing must adhere to the United States Department of Justice Interim Policy Forensic Genealogical DNA Analysis and Searching (https://www.justice.gov/olp/page/file/1204386/download), and must collect and report the metrics identified in Section IX of that document to BJA.

Condition 47
Required attendance at BJA-sponsored events

The recipient (and its subrecipients at any tier) must participate in BJA-sponsored training events, technical assistance

events, or conferences held by BJA or its designees, upon BJA's request.

Condition 48
Compliance with 28 C.F.R. Part 23

With respect to any information technology system funded or supported by funds under this award, the recipient (and any subrecipient at any tier) must comply with 28 C.F.R. Part 23, Criminal Intelligence Systems Operating Policies, if OJP determines this regulation to be applicable. Should OJP determine 28 C.F.R. Part 23 to be applicable, OJP may, at its discretion, perform audits of the system, as per the regulation. Should any violation of 28 C.F.R. Part 23 occur, the recipient may be fined as per 34 U.S.C. 10231(c)-(d). The recipient may not satisfy such a fine with federal funds.

Condition 49
The recipient agrees to notify BJA of any change in the status or duties of the collaborating agency partners or key individuals involved in implementing the activities under this award.

Condition 50
Required monitoring of subawards

The recipient must monitor subawards under this award in accordance with all applicable statutes, regulations, award conditions, and the DOJ Grants Financial Guide, and must include the applicable conditions of this award in any subaward. Among other things, the recipient is responsible for oversight of subrecipient spending and monitoring of specific outcomes and benefits attributable to use of award funds by subrecipients. The recipient agrees to submit, upon request, documentation of its policies and procedures for monitoring of subawards under this award.

Condition 51
Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

Condition 52
Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

Condition 53
The recipient agrees to promptly provide, upon request, financial or programmatic-related documentation related to this award, including documentation of expenditures and achievements. The recipient understands that it will be subject to

additional financial and programmatic in-depth or on-site monitoring, which may be on short notice, and agrees that it will cooperate with any such monitoring. The recipient agrees to develop or maintain effective internal controls to manage federal awards (see 2 C.F.R. 200.303) and effective financial management policies and procedures to manage federal awards (see 2 C.F.R. 200.302).

Condition 54
The recipient's budget (and budget narrative) is pending clearance by OJP.

Prior to budget clearance (and unless there is a more restrictive condition on this award, in which case the terms of that more restrictive condition apply): The recipient may not obligate, expend, or drawdown more than 10% of the award. Pre-clearance obligations, expenditures, and drawdowns may be disallowed if not in compliance with program requirements.

The recipient should be judicious in using award funds prior to budget clearance. Generally, OJP expects that recipients (depending on the specific project scope) may need to advertise for award-funded positions, pay personnel and fringe benefits for positions budgeted under the award, plan for project activities, attend training and pay training-related travel necessary to begin the award project, and engage in other limited activities conducted by recipient staff (i.e., generally not requiring a subaward or procurement contract under an award).

OJP will issue an Award Condition Modification upon budget clearance.

Condition 55
The recipient agrees to comply with all Federal, State, and local environmental laws and regulations applicable to the development and implementation of the activities to be funded under this award. Environmental Assessment (EA): The activities the recipient has proposed to conduct under this award fall within the scope of a BJA Programmatic EA that complies with the National Environmental Policy Act (NEPA). These activities have been determined not to have a significant impact on the quality of the human environment.

Modifications: Throughout the term of this award, the recipient agrees that for any activity that is the subject of a completed EA, it will inform BJA of-- (1) any change(s) that it is considering making to the previously assessed activity that may be relevant to environmental impact; or (2) any proposed new activities or changed circumstances that may require assessment as to environmental impact, such as new activities that involve the use of chemicals or involve construction or major renovation. The recipient will not implement a proposed change or new activity until BJA, with the assistance of the recipient, has determined whether the proposed change or new activity (or changed circumstances) will require additional review under NEPA. Approval for implementation will not be unreasonably withheld as long as any requested modification(s) is consistent with eligible program purposes and found acceptable under a BJA-conducted environmental impact review process.

Condition 56
Withholding of funds: Completion of "OJP financial management and grant administration training" required

The recipient may not obligate, expend, or draw down more than 10% of the award funds until-- (1) OJP determines that the recipient's Grant Award Administrator and all Financial Managers for this award have successfully completed an "OJP financial management and grant administration training" on or after January 1, 2021, and (2) OJP issues an Award Condition Modification (ACM) to modify or remove this condition.

Once both the Grant Award Administrator and Financial Manager have successfully completed the training required by this condition, the recipient may contact the designated grant manager for the award to request initiation of an ACM to remove this condition. Obligations, expenditures, and drawdowns prior to the ACM are made at the recipient's risk and may be disallowed if not in compliance with program requirements or approved budget.

A list of the OJP trainings that OJP will consider an "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Acting Assistant Attorney General	Brent J. Cohen	9/20/24 1:23 PM

Authorized Representative

[X]

Entity Acceptance

Title of Authorized Entity Official
Co-Executive Director

Name of Authorized Entity Official
Vincent Pan

Signed Date And Time
10/3/2024 4:00 PM

EXHIBIT 2

Meeyong Schwartz <mschwartz@aacre.org>

Fwd: Notice of Award Termination

Sheryl Fontanilla <sfontanilla@aacre.org> Tue, Apr 22, 2025 at 2:32 PM
To: Ly Nguyen <lnguyen@stopaapihate.org>, Meeyong Schwartz <mschwartz@aacre.org>, John Fong <jfong@aacre.org>

!!!!

Sheryl Fontanilla | Finance Manager | she/her
Asian Americans for Civil Rights and Equality
(415) 869-6132 | sfontanilla@aacre.org
AACRE has multiple open positions. Apply now

---------- Forwarded message ---------
From: **Office of Justice Programs** <OJP_COMMS@public.govdelivery.com>
Date: Tue, Apr 22, 2025 at 2:30 PM
Subject: Notice of Award Termination
To: <sfontanilla@aacre.org>

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 22, 2025

Subject: Termination of Award

Based on a careful review, the award listed immediately below is hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number: 15PBJA-24-GG-02840-ADVA

As provided, respectively, in the award itself, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800, apply to this award. Specifically, the award document provides notice of the applicability of the termination provisions in § 200.340.

This award is being terminated because it "no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice, other than pursuant to closeout responsibilities.

Effective date: April 22, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 calendar days of the date of this notice. Unless the Assistant Attorney General for the Office of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

(End of Notice)

You received this email because you are a current or previous Department of Justice grant applicant or award recipient. GovDelivery is providing this service on behalf of the Department of Justice and may not use your subscription information for any other purposes. For more information, review the Department of Justice Privacy Policy and the GovDelivery Privacy Policy.

This email was sent to sfontanilla@aacre.org using GovDelivery Communications Cloud on behalf of Department of Justice · Washington, DC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,

Plaintiffs, on behalf of themselves and all others similarly situated,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

PAMELA J. BONDI, in her official capacity as United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official capacity as Acting Head of the Office of Justice Programs,

Defendants.

Case No. _____

DECLARATION OF DUJUAN KENNEDY

I, Dujuan Kennedy, declare as follows:

1. My name is Dujuan Kennedy. I am a resident of Detroit, Michigan. I am over the age of eighteen. This declaration is based upon my personal knowledge and the knowledge I have acquired in the course of my duties. If called as a witness, I could and would testify competently to the matters set forth below. I provide this declaration in support of Plaintiffs' motion for preliminary injunction.

2. I am the executive director of FORCE Detroit. In this role, I oversee FORCE Detroit's finance and operations, and supervise the organization's grant writer, program directors, and grant manager. I am also accountable for FORCE Detroit's grant implementation. Before I was the Executive Director, I served as FORCE Detroit's deputy executive director of programs. As a result of having that role, I am intimately familiar with grant writing, finance and reporting processes.

FORCE Detroit and Its Mission

3. FORCE (Faithfully Organizing for Community Empowerment) Detroit is a community violence intervention (CVI) organization dedicated to building a safer, freer Detroit. Founded in 2015, FORCE Detroit is charged to steward, incubate, and provide financial support to grassroots organizations and activists committed to alternatives to community safety that minimize criminalization. FORCE Detroit's five organizational goals include: (1) building a system for peace by training and supporting CVI organizations—through grants, professional development, and mentoring, we strengthen community violence intervention statewide; (2) hosting events and actions that inform and engage the public around CVI strategies and identify solutions to gun violence; (3) building public-private partnerships to raise $150 million over 10 years to expand CVI and advocate for a Detroit Office of Neighborhood Safety; (4) growing public awareness of and engagement in violence interruption through targeted campaigns and events, such as CVI Advocacy Day, Get Out the Vote activities, and community listening sessions; and (5) strengthening our infrastructure to support growth and position FORCE Detroit as a local and national CVI leader in peacemaking.

4. As part of this work, FORCE Detroit's approach includes three core components: direct services to people impacted by violence; advocacy and public education, and training and technical assistance for emerging CVI leaders.

5. FORCE Detroit has been an active participant in the development of this lawsuit and has remained in regular communication with Plaintiffs' counsel about this case. FORCE Detroit is willing and able to take an active role in this litigation and to protect the interests of all members of the Class.

The Awarded Grants and the Termination of Grant Funding Without Notice

6. On September 26, 2024, FORCE Detroit received its first federal grant award of $1,999,998 million from the Bureau of Justice Administration FY24 Office of Justice Programs

Community Based Violence Intervention and Prevention Initiative Site-Based for the performance period of October 1, 2024 through September 30, 2027 (Award Number: 15PBJA-24-GG-03109-CVIP)(FORCE Detroit Award 1), attached here as Exhibit 1.

7. FORCE Detroit proposed to implement the "Keepers CVI" program. The purpose of the program was to expand and enhance evidence-based and innovative practices that reduce and prevent gun violence in Detroit's Warrendale-Cody Rouge neighborhood, with youth and young adults (aged 14-24) living in the catchment area (a zone targeted for CVI efforts to combat high rates of gun violence and other forms of violence) as the project's intended beneficiaries. The key areas for activities outlined in the grant proposal included delivering culturally competent wraparound services designed to help individuals and families overcome challenges, creating safe spaces for programming and transitional housing, offering workforce development and entrepreneurial training, meeting the needs of girls and women, and diversifying outreach tactics to serve high-risk individuals.

8. FORCE Detroit designed the "Keepers CVI" program to, among other things reduce fatal and non-fatal shootings, enhance opportunities for violence-impacted people to secure employment or start small businesses, increase access to culturally appropriate social services, and improve organizational capacity to deliver impactful, evidence-based programs.

9. On April 22, 2025, at 5:30 PM, FORCE Detroit received an email from the Office of Justice Programs purporting to immediately terminate FORCE Detroit's grant because the award "no longer effectuate[s] agency priorities." The termination email went on to state that "the Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuate Department priorities." No other basis or explanation for the termination was

provided. The termination email did not claim FORCE Detroit failed to comply with the terms or conditions of the awards and did not otherwise explain why the awards no longer effectuated Department priorities. The award totaled approximately $2 million dollars, with $1,945,998 of funding outstanding. A true and correct copy of the termination email is attached as Exhibit 2.

10. The termination email advised that FORCE Detroit could "appeal this termination in writing within 30 calendar days."

11. The termination email also required FORCE Detroit to commence "closeout and other obligations in 2 C.F.R. § 200.340(d)," including an obligation that FORCE Detroit "promptly refund any unobligated funds," that have been paid out, and retaining grant records for at least three years. The letter threatened that failure to meet these closeout obligations could include "appropriate enforcement actions," and "affect eligibility for future grants." FORCE Detroit has $4,845 in unpaid reimbursements through the termination date.

12. The closeout obligations include an estimated $15,000 to $25,000 in costs for administrative expenses for the audit and financial reporting required under the closeout obligation. We also must raise unrestricted funds and reallocate other existing unrestricted dollars to cover some expenses related to the grant. Unrestricted funds are the most difficult to raise because funders prefer supporting specific projects.

13. It was FORCE Detroit's understanding that the funds awarded through its grant would be available throughout the grant period and that DOJ could terminate the grant only if FORCE Detroit failed to comply with the terms and conditions of the award. It was not FORCE Detroit's understanding that DOJ could terminate the grant just because the agency said that the award no longer effectuates agency priorities.

Reliance, Employee Lay Offs, and Impact on Operations

14. The termination of FORCE Detroit's awards created an immediate harm and impact to not only FORCE Detroit's ability to maintain business and programmatic operations prescribed by the award, but it also denied funds to be paid to partners and contractors, impacting their ability to to sustain their organizations and businesses. As a result of the termination of FORCE Detroit's award:

a. three frontline FORCE Detroit employees, with significant expertise, meaningful ties to the community, and trusted relationships with high-risk program participants, were laid off;

b. contractors, partners and even young people can no longer rely on FORCE Detroit's for funding, support or services, hurting the organization's reputation, trust, and relationships in the community;

c. community events and trauma support activities have been cancelled;

d. program participants cannot access wraparound services from FORCE Detroit's care management and mentorship teams; and

e. FORCE Detroit's ability to sustain long-term programming, retain staff, and expand on the organization's critical and lifesaving violence intervention work has been eliminated.

15. FORCE Detroit relied and acted upon its expectation and understanding that DOJ would fulfill its commitment to provide grant funding. FORCE Detroit's mission centers on building community-driven responses to violence that prioritize healing, prevention, and structural change. The loss of this federal investment undercuts our ability to fulfill that mission, at scale. It eliminates the resources needed to maintain a consistent presence in communities most impacted by violence and weakens the infrastructure we built to interrupt cycles of harm, with no viable replacement in sight. Without these funds, we cannot sustain long-term programming, attract and retain qualified staff, or expand life-saving interventions that our communities urgently need.

16. The harm caused by the termination of FORCE Detroit's grant funding is not theoretical: it is real. We have seen immediate breakdowns in a care ecosystem we built with intention.

17. For example, the grant funded the very backbone of our violence intervention (VI) work, which included daily, in-the-field support for individuals most at risk of gun violence. Our VI staff do more than de-escalate conflicts. They guide people through job interviews. They show up at funerals. They help people process trauma that others have ignored.

18. At least nine FORCE Detroit positions were fully or partially paid using grant funding. When the grant was suddenly terminated, we were forced to strategically lay off three of those employees. The laid off employees were each Violence Interrupters. These positions were more than just job descriptions—they were part of a carefully planned service delivery model. Losing those roles meant losing critical functions like intake coordination, trauma support, and community-based data collection. And the laid off employees had deep community ties, were trauma-informed, and had built trust with high-risk participants.

19. Dismissing these employees so suddenly created a logistical, ethical, and emotional burden that derailed our staff's focus from violence interruption work. As a result of the terminations and layoffs, we have seen staff burnout escalate as their caseloads increased and support decreased, and field-based programming interrupted (e.g., outreach follow-ups dropped, safe space meetups canceled).

Reputational Harm and Impact on Community Contractors

20. In addition to seriously harming FORCE Detroit's organizational stability and staff morale, we have suffered reputational harm as a result of the grant termination. We have lost creditability with partners and community members who relied on us to follow through on commitments funded through the grant.

21. Over the grant term, FORCE Detroit budgeted $149,660 for contractors. A significant amount of the budget funding would go to entrepreneurs who anticipated having three-year assignments. We identified several contractors with the skills and credibility to provide participants with quality program experiences that align with our goals and objectives. These independent business owners counted on the income they would receive from working with us. It became part of their annual earnings forecast, which means they may have turned down other projects based on their commitments to FORCE Detroit.

22. The sudden and abrupt termination of our grant forced staff to call our contracted partners—local coaches, mentors, licensed therapists, and trainers—to tell them that the income they had been counting on would not materialize. These calls eroded the multi-year relationships FORCE Detroit had in the works with these contractors. For example, a member of our staff had to inform a licensed trauma counselor who cleared space in their practice specifically for our participants that FORCE Detroit's funding had been terminated. Now that counselor faces a financial shortfall and a waiting list of participants they are unable help.

Impact on Community

23. The sudden termination of the grant forced FORCE Detroit to halt key components of our violence intervention strategy midstream. We were unable to fulfill hiring plans and contracts, had to scale back programming, and paused active interventions that directly support individuals at risk of gun violence. We have had to pivot to alternative funding options to ensure we did not have to lay off any additional staff essential to maintaining community trust and continuity of care, including trained outreach workers and program coordinators. We have had to cancel community events and trauma support activities that were part of our violence reduction strategy. Additionally, program participants receiving intensive wraparound services from our care management and mentorship teams now lack support.

24. The communities we serve are already disproportionately impacted by violence, systemic disinvestment, and trauma. The most damaging impact of this termination is that it abruptly removed trusted support systems for individuals at the highest risk of involvement in violence. Our VI team had actively engaged these young people in healing trauma or transitional efforts. Many had begun to rely on us for safety planning, relocation assistance, employment support, or therapy referrals. The loss of service continuity threatens to undo that progress, destabilize individuals and families, and erode trust in community-based approaches. Worse, it communicates to our participants that their lives and communities are not a sustained priority for our government.

25. For example, Ruth, a devoted mother of five, endured a life-changing ordeal when violence erupted outside her home. In June 2023, gunfire from an unidentified vehicle left her and a neighbor injured, and subsequent threats forced her into homelessness. Despite holding a Section 8 voucher and a steady job, housing instability continued to haunt her. Ruth was referred to FORCE Detroit's Keeper program in October 2023 and began the challenging journey to rebuild her life. She actively participated in therapy sessions and worked with the Keepers team to find stable housing. Ruth's unwavering faith and the support of the Keepers have given her hope, reminding us that recovery is possible with the right resources and community support. But without grant funding, FORCE Detroit will be unable to support or expand the Keeper's program to continue to help community members like Ruth.

26. Another example of FORCE Detroit's impact—and the harm that results from the termination of its grant award—is Carol's story. Carol, a single mother and dedicated nurse, faced unimaginable trauma when an act of kindness turned into a nightmare. After offering temporary shelter to a friend, Carol and her children became targets of escalating violence, culminating in the tragic shooting of her stepdaughter. Forced to flee their home, the family relied on FORCE Detroit for emergency housing and relocation support. Despite ongoing threats and setbacks, including acts

of arson and harassment, Carol secured a new home in January 2024. With move-in expenses covered by FORCE Detroit and access to therapy services, her family began to heal. FORCE Detroit cannot sustain or continue providing critical assistance to victims of violence in Detroit, as it did for Carol, as a result of the award termination.

Signature on following page.

Date: May 21, 2025

Dujuan Kennedy

Dujuan Kennedy
Executive Director of FORCE Detroit
Detroit, Michigan

EXHIBIT 1

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	FORCE DETROIT 1551 ROSA PARKS BLVD STE B
City, State and Zip:	DETROIT, MI 48216
Recipient UEI:	VFFXXK95G6P3

Project Title: The Keepers CVI program emphasizes workforce development, education, and social-emotional awareness for residents at risk of perpetrating or falling victim to violent crime.	**Award Number:** 15PBJA-24-GG-03109-CVIP
Solicitation Title: BJA FY24 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative Site-Based	
Federal Award Amount: $1,999,998.00	**Federal Award Date:** 9/26/24
Awarding Agency: Office of Justice Programs Bureau of Justice Assistance **Funding Instrument Type:** Grant	
Opportunity Category: D **Assistance Listing:** 16.045 - Community-Based Violence Intervention and Prevention Initiative	
Project Period Start Date: 10/1/24	**Project Period End Date:** 9/30/27
Budget Period Start Date: 10/1/24	**Budget Period End Date**: 9/30/27

Project Description:

FORCE Detroit will implement The Keepers community violence intervention (CVI) program in Detroit, MI. The purpose is to expand and enhance evidence-based and innovative practices that reduce and prevent gun violence in the city's Warrendale Cody Rouge neighborhood which has been marginalized by race, poverty, criminalization, and violence. Project activities include delivering culturally competent wraparound services, creating safe spaces for programming and transitional housing, offering workforce development and entrepreneurial training, meeting the needs of girls and young women, and diversifying outreach tactics to serve extremely high-risk individuals. Expected outcomes includes a reduction in fatal and non-fatal shootings, enhanced opportunities for violence-impacted people to secure employment or start small businesses, increased access to culturally appropriate social services, and improved organizational capacity to deliver impactful, evidence-based programs.

Award Letter

September 26, 2024

Dear Bridgett Lomax,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by FORCE DETROIT for an award under the funding opportunity entitled 2024 BJA FY24 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative Site-Based. The approved award amount is $1,999,998.
Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Brent J. Cohen
Acting Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) enforces federal civil rights laws and other provisions that prohibit discrimination by recipients of federal financial assistance from OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW).

Several civil rights laws, including Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance (recipients) to give assurances that they will comply with those laws. Taken together, these and other civil rights laws prohibit recipients from discriminating in the provision of services and employment because of race, color, national origin, religion, disability, and sex or from discriminating in the provision of services on the bases of age.

Some recipients of DOJ financial assistance have additional obligations to comply with other applicable nondiscrimination provisions like the Omnibus Crime Control and Safe Streets Act of 1968, which prohibits discrimination on the basis of religion in addition to race, color, national origin, and sex. Recipients may also have related requirements regarding the development and implementation of equal employment opportunity programs.

OCR provides technical assistance, training, and other resources to help recipients comply with civil rights obligations. Further, OCR administratively enforces civil rights laws and nondiscrimination provisions by investigating DOJ recipients that are the subject of discrimination complaints. In addition, OCR conducts compliance reviews of DOJ recipients based on regulatory criteria. These investigations and compliance reviews permit OCR to evaluate whether DOJ recipients are providing services to the public and engaging in employment practices in a nondiscriminatory manner.

For more information about OCR, your civil rights and nondiscrimination responsibilities, how to notify your employees or beneficiaries of their civil rights protections and responsibilities and how to file a complaint, as well as technical assistance, training, and other resources, please visit www.ojp.gov/program/civil-rights-office/outreach. If you would like OCR to assist you in fulfilling your civil rights or nondiscrimination responsibilities, please contact us at askOCR@ojp.usdoj.gov or www.ojp.gov/program/civil-rights-office/about#ocr-contacts.

Memorandum Regarding NEPA

NEPA Letter Type
OJP - Categorical Exclusion

NEPA Letter

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third party action:

(1) New construction

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species

(3) A renovation that will change the basic prior use of a facility or significantly change its size

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment

(5) Implementation of a program involving the use of chemicals (including the

identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or Orbin Terry, Environmental Coordinator for the Bureau of Justice Assistance.

NEPA Coordinator

First Name	Middle Name	Last Name
Orbin		Terry

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
FORCE DETROIT

UEI
VFFXXK95G6P3

Street 1
1551 ROSA PARKS BLVD STE B

Street 2

City
DETROIT

State/U.S. Territory
Michigan

Zip/Postal Code
48216

Country
United States

County/Parish
no value

Province
no value

Award Details

Federal Award Date
9/26/24

Award Type
Initial

Award Number
15PBJA-24-GG-03109-CVIP

Supplement Number
00

Federal Award Amount
$1,999,998.00

Funding Instrument Type
Grant

Assistance Listing Number	Assistance Listings Program Title
16.045	Community-Based Violence Intervention and Prevention Initiative

Statutory Authority

Bipartisan Safer Communities Supplemental Appropriations Act, 2022 (Pub. L. No. 117-159, 136 Stat. 1313, 1339); 28 U.S.C. 530C

Department of Justice Appropriations Act, 2024 (Pub. L. No. 118-42, 138 Stat. 25, 148-49)

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title

2024 BJA FY24 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative Site-Based

Awarding Agency

OJP

Program Office

BJA

Application Number

GRANT14157501

Grant Manager	Phone Number	E-mail Address
Meredith Healey	202-445-9753	Meredith.Healey@usdoj.gov

Project Title

The Keepers CVI program emphasizes workforce development, education, and social-emotional awareness for residents at risk of perpetrating or falling victim to violent crime.

Performance Period Start Date	Performance Period End Date
10/01/2024	09/30/2027

Budget Period Start Date	Budget Period End Date
10/01/2024	09/30/2027

Project Description

FORCE Detroit will implement The Keepers community violence intervention (CVI) program in Detroit, MI. The purpose is to expand and enhance evidence-based and innovative practices that reduce and prevent gun violence in the city's Warrendale Cody Rouge neighborhood which has been marginalized by race, poverty, criminalization, and violence. Project activities include delivering culturally competent wraparound services, creating safe spaces for programming and transitional housing, offering workforce development and entrepreneurial training, meeting the needs of girls and young women, and diversifying outreach tactics to serve extremely high-risk individuals. Expected outcomes includes a reduction in fatal and non-fatal shootings, enhanced opportunities for violence-impacted people to secure employment or start small businesses, increased access to culturally appropriate social services, and improved organizational capacity to deliver impactful, evidence-based programs.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Condition 1
Meaningful access requirement for individuals with limited English proficiency

The recipient, and any subrecipient at any tier, must take reasonable steps to ensure that individuals with limited English proficiency (LEP) have meaningful access to their programs and activities to comply with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of national origin, including discrimination against individuals with LEP. Such steps may require providing language assistance services, such as interpretation or translation services. The Department of Justice guidance on compliance with this requirement may be found at "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (67 Fed. Reg. 41455-41472) (https://www.federalregister.gov/d/02-15207) and is incorporated by reference here.

Condition 2
Compliance with general appropriations-law restrictions on the use of federal funds (FY 2024)
The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions that may be set out in applicable appropriations acts are indicated at https://ojp.gov/funding/Explore/FY24AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

Condition 3
Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

Condition 4
Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

Condition 5
Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this award from OJP.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

Condition 6
Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

Condition 7
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38.

Among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38 also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

Recipients and subrecipients that provide social services under this award must give written notice to beneficiaries and prospective beneficiaries prior to the provision of services (if practicable) which shall include language substantially similar to the language in 28 CFR Part 38, Appendix C, sections (1) through (4). A sample written notice may be found at https://www.ojp.gov/program/civil-rights-office/partnerships-faith-based-and-other-neighborhood-organizations.

In certain instances, a faith-based or religious organization may be able to take religion into account when making hiring decisions, provided it satisfies certain requirements. For more information, please see https://www.ojp.gov/funding/explore/legaloverview2024/civilrightsrequirements.

Condition 8
Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

Condition 9
Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

Condition 10
Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

Condition 11
Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

Condition 12
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an

equal employment opportunity program.

Among other items, 28 C.F.R. § 42.106(d), 28 C.F.R. § 42.405(c), and 28 C.F.R. § 42.505(f) contain notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

Condition 13
Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

Condition 14
Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

Condition 15
Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

Condition 16
Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

Condition 17
Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been

reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

Condition 18
Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

Condition 19
OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

Condition 20

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

Condition 21
Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

Condition 22
Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

Condition 23
Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

Condition 24
Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

Condition 25
Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

Condition 26
Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

Condition 27
Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

Condition 28
Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To

Enhance Public Trust and Public Safety," OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient ("subgrantee") at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the "controlled equipment" list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition: Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

Condition 29
Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

Condition 30
All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

Condition 31
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

Among other items, 28 C.F.R. § 54.140 contains notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

Condition 32
The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

Condition 33
The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJA's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).

Condition 34
The recipient agrees that no funds under this grant award (including via subcontract or subaward, at any tier) may be used for unmanned aircraft systems (UAS), which includes unmanned aircraft vehicles (UAV), or for any accompanying accessories to support UAS.

Condition 35
Verification and updating of recipient contact information

The recipient must verify its Grant Award Administrator, Financial Manager, and Authorized Representative contact information in JustGrants, including telephone number and e-mail address. If any information is incorrect or has changed, the award recipient’s Entity Administrator must make changes to contact information through DIAMD. Instructions on how to update contact information in JustGrants can be found at https://justicegrants.usdoj.gov/training/training-entity-management.

Condition 36
The recipient agrees to submit to BJA for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award at least thirty (30) working days prior to the targeted dissemination date. The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities. Any products developed under this award, (with the exception of press releases, web sites, and mobile applications), shall contain the following statements: “This project was supported by Grant No. <Award_Number> awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." (Note: A separate disclaimer has been developed and is required for web sites and mobile applications. No disclaimer is required for press releases.)

Condition 37
Any Web site that is funded in whole or in part under this award must include the following statement on the home page, on all major entry pages (i.e., pages (exclusive of documents) whose primary purpose is to navigate the user to interior content), and on any pages from which a visitor may access or use a Web-based service, including any pages that provide results or outputs from the service: "This Web site is funded in whole or in part through a grant from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)." The full text of the foregoing statement must be clearly visible on the home page. On other pages, the statement may be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

Condition 38
FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

Condition 39
Confidentiality of data

The recipient (and any subrecipient at any tier) must comply with all confidentiality requirements of 34 U.S.C. 10231 and 28 C.F.R. Part 22 that are applicable to collection, use, and revelation of data or information. The recipient further agrees, as a condition of award approval, to submit a Privacy Certificate that is in accord with requirements of 28 C.F.R. Part 22 and, in particular, 28 C.F.R. 22.23.

Condition 40
The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.

Condition 41
Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

Condition 42
Protection of human research subjects

The recipient (and any subrecipient at any tier) must comply with the requirements of 28 C.F.R. Part 46 and all OJP policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.

Condition 43
Required attendance at BJA-sponsored events

The recipient (and its subrecipients at any tier) must participate in BJA-sponsored training events, technical assistance events, or conferences held by BJA or its designees, upon BJA's request.

Condition 44
Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently,

"FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

Condition 45
Recipient understands and agrees to report on the use and status of real property acquired, constructed, or improved under this award, throughout the useful life of the property or until the federal interest in the property ceases, whichever is shorter. Recipient further agrees to provide the required use and status reports on federal Standard Form 429 and accompanying addenda, as directed by OJP, in conformance with 2 C.F.R. 200.330. Recipient must submit its initial report not later than 90 days after completion of the project or of grant close-out, whichever is earlier, and submit status reports annually, as directed. Additional information about this requirement may be found online at https://bja.ojp.gov/funding/real-property.

Condition 46
The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

Condition 47
The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

Condition 48
The Project Director and/or any other key program personnel designated in the application shall be replaced only for compelling reasons. Successors to key personnel must be approved by OJP, and such approval is contingent upon submission of appropriate information, including, but not limited to, a resume. Changes in program personnel, other than key personnel, require only notification to OJP and submission of resumes, unless otherwise designated in the award document.

Condition 49
The recipient agrees to promptly provide, upon request, financial or programmatic-related documentation related to this award, including documentation of expenditures and achievements. The recipient understands that it will be subject to additional financial and programmatic in-depth or on-site monitoring, which may be on short notice, and agrees that it will cooperate with any such monitoring. The recipient agrees to develop or maintain effective internal controls to manage federal awards (see 2 C.F.R. 200.303) and effective financial management policies and procedures to manage federal awards (see 2 C.F.R. 200.302).

Condition 50
The recipient's budget (and budget narrative) is pending clearance by OJP.

Prior to budget clearance (and unless there is a more restrictive condition on this award, in which case the terms of that more restrictive condition apply): The recipient may not obligate, expend, or drawdown more than 10% of the award. Pre-clearance obligations, expenditures, and drawdowns may be disallowed if not in compliance with program requirements.

The recipient should be judicious in using award funds prior to budget clearance. Generally, OJP expects that recipients (depending on the specific project scope) may need to advertise for award-funded positions, pay personnel and fringe benefits for positions budgeted under the award, plan for project activities, attend training and pay training-related travel necessary to begin the award project, and engage in other limited activities conducted by recipient staff (i.e., generally not requiring a subaward or procurement contract under an award).

OJP will issue an Award Condition Modification upon budget clearance.

Condition 51

Withholding of funds: Completion of "OJP financial management and grant administration training" required

The recipient may not obligate, expend, or draw down more than 10% of the award funds until-- (1) OJP determines that the recipient's Grant Award Administrator and all Financial Managers for this award have successfully completed an "OJP financial management and grant administration training" on or after January 1, 2021, and (2) OJP issues an Award Condition Modification (ACM) to modify or remove this condition.

Once both the Grant Award Administrator and Financial Manager have successfully completed the training required by this condition, the recipient may contact the designated grant manager for the award to request initiation of an ACM to remove this condition. Obligations, expenditures, and drawdowns prior to the ACM are made at the recipient's risk and may be disallowed if not in compliance with program requirements or approved budget.

A list of the OJP trainings that OJP will consider an "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

Condition 52
The recipient must submit a final report summarizing the activities of the CVIPI program, including successes and lessons learned, as well as future plans for the program. If the program includes a research partner as part of the working group, it is expected their programmatic process and/or outcome findings be integrated into the final report. The final report must be submitted in JustGrants no later than 120 days after the project end date.

Condition 53
The recipient must, working with the CVIPI TTA providers and OJP, develop or enhance a community-specific Violence Reduction Strategic Plan. The final Strategic Plan must be submitted as an award deliverable in JustGrants (along with a revised budget if needed) within 18 months of the award start date.

Condition 54
The recipient must submit a full list of active CVIPI team members, as well as letters of commitment and/or MOUs, within the first 6 months of the date of award, unless an extension for good cause shown has been granted by BJA. Failure to submit the MOU within six months of the date of award may result in the freezing of grant funds.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand

that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Acting Assistant Attorney General	Brent J. Cohen	9/24/24 5:50 PM

Authorized Representative

[X]

Entity Acceptance

Title of Authorized Entity Official
Contract Proposal Writer

Name of Authorized Entity Official
Bridgett Lomax

Signed Date And Time
10/18/2024 1:49 PM

EXHIBIT 2

---------- Forwarded message ---------
From: **Office of Justice Programs** <[illegible]@public.govdelivery.com>
Date: Tue, Apr 22, 2025, 5:30 PM
Subject: Notice of Award Termination
To: <oresha@forcedetroit.org>

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 22, 2025

Subject: Termination of Award

Based on a careful review, the award listed immediately below is hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number: 15PBJA-24-GG-03109-CVIP

As provided, respectively, in the award itself, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800, apply to this award. Specifically, the award document provides notice of the applicability of the termination provisions in § 200.340.

This award is being terminated because it "no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice, other than pursuant to closeout responsibilities.

Effective date: April 22, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 calendar days of the date of this notice. Unless the Assistant Attorney General for the Office of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

(End of Notice)

You received this email because you are a current or previous Department of Justice grant applicant or award recipient. GovDelivery is providing this service on behalf of the Department of Justice and may not use your subscription information for any other purposes. For more information, review the Department of Justice Privacy Policy and the GovDelivery Privacy Policy.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTR31ICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,

Plaintiffs, on behalf of themselves and all others similarly situated,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

PAMELA J. BONDI, in her official capacity as United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official capacity as Acting Head of the Office of Justice Programs,

Defendants.

Case No. _____

DECLARATION OF STEVEN RIDINI

I, Steven Ridini, declare as follows:

1. My name is Steven Ridini. I am a resident of Suffolk County in the State of Massachusetts. I am over the age of eighteen. This declaration is based upon my personal knowledge and the knowledge I have acquired in the course of my duties. If called as a witness, I could and would testify competently to the matters set forth below. I provide this declaration in support of Plaintiffs' motion for preliminary injunction.

2. I am the President and CEO of Health Resources in Action (HRiA). In this role, I lead the organization and partner with the HRiA Board and staff to develop a vision and strategic direction rooted in addressing critical public health issues through a health and racial equity framework. This includes building strategic partnerships with key individuals and organizations to

advance HRiA's mission and maximize our community impact. I started as President and CEO on March 1, 2016, and have served in the position for nine years.

3. In my role as CEO, I oversee and hold programmatic and fiduciary responsibility across the programs affected by the grant terminations. I work with the appropriate staff to ensure that all programmatic deliverables are effectively met, fiscal management is sound, and the organization is in compliance with the terms as outlined in the grant awards.

4. In addition to my role as CEO, I serve as a Board member or contributing member to numerous public health organizations, such as, the American Public Health Association, the Massachusetts Public Health Alliance (past Board Chair), and the National Network of Public Health Institutes (Board member). Prior to my current position, I served as Vice President of Programs at HRiA for 18 years, overseeing community health initiatives. Prior to HRiA, I worked for local, national, and international non-profits focused on alcohol, tobacco, and other drug prevention efforts. I am also a former faculty member of Harvard University's Graduate School of Education.

Health Resources in Action's Mission and Impacted Programs

5. Health Resources in Action is a national public health organization with a vision of healthy people thriving in equitable and just communities. Founded in 1957 with over 300 staff across the country, HRiA partners with individuals, organizations, and communities to transform the practices, policies, and systems that improve health and advance racial equity. For decades, HRiA has worked in communities across the country to plan and launch community violence intervention (CVI) strategies that cultivate and strengthen a comprehensive and collaborative CVI ecosystem. This includes identifying and engaging people at the highest risk of violence, employing CVI workers who hold deep knowledge, credibility, and trust within communities, expanding professional and educational opportunities for CVI workers and the organizations they work within, developing relationships with law enforcement and community, building partnerships between CVI organizations

and cross-sector partners, and establishing and strengthening hospital-based violence intervention programs. Approaching violence as a public health issue, HRiA staff help communities understand that violence spreads like disease, violence is preventable, and community members have critical solutions to offer. HRiA partners with institutions and organizations to strengthen the community violence intervention ecosystem.

6. As part of this work, Health Resources in Action oversees three Department of Justice (DOJ) initiatives directly impacted by the grant terminations: Building Trauma Informed Practices and Workforce Development for the CVI Field (Award No. 15PBJA-24-GK-04067-CVIP) (HRiA Award 1), attached here as Exhibit 1; Advancing Hospital-based Victim Services (AHVS) (Award No. 15POVC-22-GK-00557-NONF) (HRiA Award 2), attached here as Exhibit 3; and Boosting Organizational Capacity for Community Violence Intervention (BoostCVI) (Award No. 15PBJA-23-GK-05187-CVIP) (HRiA Award 3), attached here as Exhibit 5. HRiA also receives two sub-grants on two partnered DOJ-funded awards that have also been impacted by terminations.

7. HRiA has been an active participant in the development of this lawsuit and has remained in regular communication with Plaintiffs' counsel about this case. HRiA is willing and able to take an active role in this litigation and to protect the interests of all members of the Class.

HRiA's Grant Process, in General

8. HRiA was founded in 1957 as a biomedical grantmaking institution and expanded our work to focus on community health grantmaking. HRiA's grantmaking approach directs funds where they are most needed, recognizing that organizations most impactful in reducing community violence often may not have resources or experience in applying for or securing grant opportunities.

9. HRiA's BoostCVI Grant Program under HRiA Award 3 is an example of HRiA's grantmaking approach that opens opportunities for a broad array of potential applicants. The program aimed to build and strengthen the community violence intervention (CVI) ecosystem by breaking

down barriers for small, community-based organizations (CBOs) doing CVI work, allowing those groups to access funding. Such CBOs who possess deep roots in the community and make a powerful impact can lack the infrastructure or support to take in large federal or statewide grants. Via key informant interviews with CVI CBO leaders, we identified that there was an urgent need for funding directed toward organizational development and capacity building. Therefore, BoostCVI's goals were to: 1) Support organizations building or strengthening their ability to offer the full spectrum of services of violence prevention and intervention, and 2) Build organizational capacity, deepen and expand reach, and support infrastructure that strengthens organizational operations and broader field sustainability.

10. The BoostCVI grant program process aligns with a typical grantmaking process for HRiA. HRiA conducted a non-binding Letter of Intent (LOI) process prior to releasing a Request for Proposals (RFP). The LOI served as an opportunity for organizations to submit a brief overview of their proposed project. The purpose of the LOI was to solicit interest, assess the desire for pre-application supports via listening sessions, office hours, workshops on concepts, tutorials on SAM sign-ups, etc., and ensure that outreach in the target communities reached organizations that needed capacity building. The LOI itself was designed to be a low barrier to ensure organizations would not need to hire a grant writer, and HRiA provided LOI development support throughout. Once LOIs were submitted, HRiA's project team reached out to each organization to provide personalized feedback on eligibility, with guidance on how to strengthen their application for the next round. The LOI served as an opportunity for organizations to strengthen their proposed ideas and see if their program was a fit without needing to go through the entire RFP submission process. Following the LOI, HRiA released an RFP, accompanied with active outreach to CVI organizations, a bidder's conference, finance-specific webinars with a financial consultant to support organizations to prepare their organizational infrastructure for federal grants and budgeting, and office hours to support

applicants through every stage of the RFP process. Ultimately, 33 organizations submitted full grant proposals, with five organizations each being awarded a $250,000 grant over the course of 24 months.

Termination of HRiA's Grant Funding Without Notice

11. On the evening of April 22, 2025, HRiA received emails from the Office of Justice Programs purporting to immediately terminate HRiA's three grants because the awards "no longer effectuate the program goals or agency priorities 2 C.F.R. § 200.340(a)(4)." The termination email went on to state that: "The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities." No other basis or explanation for the terminations were provided. The termination email did not claim HRiA failed to comply with the terms or conditions of the awards and did not otherwise explain why the awards no longer effectuated Department priorities. True and correct copies of each termination email are attached as Exhibit 2, 4, and 6.

12. The terminated direct awards with DOJ totaled $8,550,000, with $1,694,397 drawn down to date, and $93,870 due to HRiA at the time of termination. $6,761,733 remains in the terminated contracts.

13. The termination emails advised that HRiA could "appeal this termination in writing within 30 calendar days of the date of this notice."

14. The termination email also required HRiA to commence "closeout and other obligations in 2 C.F.R. § 200.340(d)," including an obligation that HRiA "promptly refund any unobligated funds," that have been paid out but "are not authorized to be retained," and retaining grant records for at least three years after the submission of a final financial report. The letter

threatened that failure to meet these closeout obligations could include "appropriate enforcement actions," and "affect eligibility for future grants."

15. The closeout obligations include preparing and submitting the grant reports; terminating agreements with vendors, consultants, and partners; and submitting remaining reimbursement requests for project and closeout expenses.

16. It was HRiA's understanding that the funds awarded by these grants would be available throughout the grant periods and that DOJ could terminate the grants only if HRiA failed to comply with the terms and conditions of the awards. It was not HRiA's understanding that DOJ could terminate these grants based on that agency's blithe assertion that the awards no longer affect agency priorities.

17. Until January 2025, HRiA has never had a federal award terminated before; there is no precedent for this in our history. HRiA has managed $92 million in federal award expenditures over the past 10 years. Throughout HRiA's history, the organization has received direct federal awards from 10 programs of 3 federal agencies and has served as a pass-through recipient of dozens of other federal programs.

Harms Across HRiA and the CVI Ecosystem

18. The termination of HRiA's awards created an immediate harm and impact to not only HRiA's ability to maintain business and programmatic operations prescribed by the awards, but it also denied funds to be paid to subrecipients, impacting their ability to have the financial resources to sustain their organizations. As a result of the termination of HRiA's awards:

a. critical, lifesaving technical assistance is unavailable for 23 hospital-based violence intervention programs, which may ultimately result in the loss of life for violently injured people looking for help from the programs;

b. numerous hospitals are without training and technical assistance for their violence prevention professionals, who provide invaluable support and mitigate retaliation for victims of community violence;

c. Subaward recipients—who serve youth and young adults, are often the sole source of CVI work in their communities, and relied on this funding to expand their operations—have halted their programs, terminated employees, lost the trust of their community and partners, and been deprived of the training and resources needed to support their organizations

d. CVI outreach workers, violence interrupters, case managers, and hospital-based violence intervention program professionals, and frontline workers at CBOs and programs who were awarded subgrants through HRiA face layoffs, diminished hours, reassignment, and termination, without meaningful alternatives for employment;

e. at least 250 government, health care and philanthropy leaders, and frontline workers could lose the opportunity to attend a HRiA-hosted annual conference and learn best practices to respond to community violence; and

f. 31 members of HRiA staff, who support this work and are funded through the grants, could lose their jobs.

19. Organizationally, HRiA relied and acted upon its expectation and understanding that DOJ would fulfill its commitment to provide grant funding. HRiA relied on this by hiring new staff and assigning existing staff to design and implement effective programming aligned with these awards, building partnerships and executing sub-contracts with community-based organizations and consultants to carry out the work, engaging trusted messengers and organizations to publicize widely the community investment opportunities afforded by this funding, and building HRiA's internal

infrastructure to manage large federal grants and support CBOs to do the same. The Department of Justice's termination of these grants with no notice will force HRiA to make cuts in its budget to offset the loss of funding, which includes cutting the budgets of programs tasked with carrying out the grant awards, cutting subawards that assist HRiA in carrying out the mission of this work, and cutting funding for other programs and staff.

20. Beyond the direct financial losses, DOJ's termination of these grants creates immense uncertainty for HRiA organizationally and has required HRiA employees directly working on these initiatives, as well as HRiA's executive leadership and administration and finance staff, to spend significant amounts of time working on responding to that disruption. My team and I have spent substantial time attempting to quantify and mitigate the effects of these grant terminations— time that could have been spent working to address improving the public's health and wellbeing and reducing community violence. This is very difficult to do without the terminated resources; yet, not doing so can have damaging impacts on HRiA's reputation and credibility, since as a funder and capacity builder for small, grassroots community-based organizations, trust can easily be broken when HRiA fails to deliver on financial or capacity building commitments.

21. The termination of all three direct awards creates uncertainty for the 31 members of HRiA's staff working directly on these initiatives. All three awards covered 100% of three HRiA staff person's salaries, and varying percentages from 5% to 50% of the other 28 HRiA employees. This has created extreme stress among staff about the possibility of losing their jobs in a specialized, underfunded CVI field that already has lost $811 million in federal funding and has seen a reduction in the workforce given the abrupt federal award terminations.

22. Beyond the organizational instability that these terminations have precipitated, the termination of all awards exacerbates financial insecurity for our CVI community partners and frontline workers (including CVI outreach workers, violence interrupters, case managers, hospital-

based violence intervention program, Violence Prevention Professionals (VPPs), and other individuals providing essential services). CVI programs are not only a means of contributing to public safety; they are a vital source of economic stability. Grant awards were designed to provide direct financial compensation to frontline workers, many of whom work for low wages and without benefits or life insurance. For CBOs and programs who no longer have access to grants or funding through our initiatives, staff are facing layoffs, diminished hours, reassignment, and terminations. This disproportionately impacts a workforce that typically has few alternative pathways to employment. Many staff are forced to find ways to continue their commitment to CVI work without financial support or stability, often needing to work other jobs to make ends meet. CVI workers are already at high risk for burnout given the inherent risks of this work, difficulty recruiting new generations of frontline workers, and the high turnover rates in the field; these terminations undermine the stability of this critical and essential workforce. Frontline workers prevent violence and save lives every day.

23. The termination of the grant funding also endangers critical workforce development and educational opportunities to build capacity for the CVI field. HRiA is a national training and technical assistance provider and a cross-sector convener, but the field has lost access to our services, including HRiA's annual field-wide conferences, both nationally and locally.

24. For example, HRiA's field-wide conference brings together a national group of approximately 1,000 frontline workers and leaders from government, health care, philanthropy, and CVI to share innovative and best practices, lessons from the field, research, and community partnerships. Funding from our terminated Awards 1 and 2 provided funding for 250 participants to travel to the national 3-day conference; yet, termination of the funding imperils this opportunity for their individual professional development, as well as for broader resource sharing across the field that streamlines responses to violence. At this time, it is unclear whether we can feasibly hold the conference, and if we do, we anticipate low turnout with the funding uncertainty. Because of this

termination, participants may ultimately be deprived of the opportunity to share innovative and best practices, lessons from the field, research, and community partnerships, making communities across the country less safe.

25. As another example, HRiA provides best practice guidance to hospital-based violence intervention programs (HVIP) and community partners in the CVI ecosystem. Yet, the terminations forced us to cease work with 23 HVIPs across the US in cities with high rates of violence. This disruption of capacity building assistance, coupled with sites that lost their own DOJ funding, means that there are fewer programs with adequate resources to meet the needs of people violently injured who present to hospitals and CBOs for critical, life-saving assistance. This means that, in 23 hospitals across the country, individuals who directly benefitted from these intervention programs in the hospital are no longer going to have life-saving assistance, and in some cases, members in the community will lose their lives because of the disruption of services.

26. The economic insecurity and loss of professional development and field building opportunities for frontline workers and CVI CBOs not only has economic and CVI workforce retention impacts; this disinvestment and loss of frontline staff and community-based CVI infrastructure destabilizes the communities these programs were designed to support and undermines public safety. Prematurely ending our CVI work and funding to our partners has dire and dangerous consequences.

27. The five direct-service programs funded through the Award 3 (BoostCVI) grant served individuals at highest risk or proven risk of involvement in violence. At the individual level, people who were in the contemplation stages of change and are at the most risk for gun violence are left unsupported and susceptible to the environment they are in; people who were mid-transformation can lose momentum or backslide; and, people who were connecting with frontline workers may be more difficult to reach with gaps in services and supports. At the neighborhood level, with the halt

in work due to terminations, CVI communities are harmed by the lack of immediate intervention with active conflicts and retaliations, as well as the lack of response to flare ups in violence. Additionally, because building credibility and trust is so critical for effective CVI work, the lapse in contact with known CVI workers and organizations can breach this trust, causing momentum built over these last years of work to halt or regress.

Award 1: BJA FY24 OJP Community Based Violence Intervention and Prevention Initiative Training and Technical Assistance Program

28. HRiA received $2,500,000 in grant funding for the Building Trauma Informed Practices and Workforce Development for the CVI Field project, starting October 1, 2024, through September 30, 2026. HRiA received this grant to expand professional and educational opportunities for CVI workers and transform their work environments – just as CVI workers do for violently injured individuals and the communities that they support.

29. The project aimed to engage trusted workers in CVI as partners and subject matter experts (SME) in the creation of competencies and resources for developing the workforce, addressing vicarious trauma, and instituting organizational practices that promote collective care and wellness. Strategies included: tailored technical assistance to individual CVI Prevention Initiative (CVIPI) - funded and other interested sites; cohort-based, peer-to-peer learning on topics related to equitable staff development, vicarious trauma, and trauma-informed practices; trainings, conferences, and convenings; development and dissemination of training materials and knowledge products; and continuous evaluation, self-assessment, and quality improvement.

30. The termination of Award 1 also halts capacity building work. Staff funded through this grant were engaged in a needs assessment and outreach to CVI organizations nationally; however, the terminations forced us to abruptly cease all communications with stakeholders. Also, in March 2025, the program hosted a forum in Milwaukee to address the mental health consequences of

violence and trauma. Frontline workers served as subject matter experts along with HRiA staff. The team worked with a professional videography company to create an educational video as part of a national toolkit for the field. With the termination of funding, the program cannot complete this project. The time and resources invested were wasted. The harm ripples to others: Frontline workers will not receive the benefits of the grant program in terms of workforce development opportunities, learning, and compensation for their subject matter expertise. Half of the grant was allocated toward direct compensation for frontline workers as subject matter experts and collaborators on the project. Terminating the scope of work with the videography company means that they lost the work and income that they were expecting from HRiA.

Award 2: OVC FY24 Advancing Hospital-based Victim Services Technical Assistance Project

31. HRiA received a $2,050,000 grant, beginning October 1, 2024, through September 30, 2026, to provide tailored and comprehensive technical assistance (TA) and training to grantee sites that advance hospital-based victim services. Hospitals rely on Violence Prevention Professionals (VPPs) and HVIPs to manage safety onsite at the hospitals. VPPs serve as trusted individuals in hospitals who, respond to victims of violence, and reduce and mitigate the risks of retailiation and further violence. VPPs also address the needs of loved ones of the injured person, and coordinate with law enforcement.

32. The TA provider would facilitate peer learning communities across the sites and provide training to VPPs to increase their skills and capacity to respond to the complex needs of victims, and to supervisors of VPPs to promote the professional development and advancement of frontline staff. Hospital-based victims services would also receive expert consultation to develop sustainability plans. The aim of this initiative ultimately included: generating model policies, recommendations, and guidance documents; disseminating information about best practices; and

fostering cross-sector collaboration and sharing innovative learning from this project to bolster and expand the field of victim services.

33. This specialized partnership with hospital providers is an invaluable and irreplaceable resource that allows the medical staff to care for their patients while the HVIP staff manage the aftermath and safety risks. The project's technical assistance helps HVIPs understand their role in building bridges with community partners and systems including public health, law enforcement, basic needs services, and other community resources that help victims on their healing journey. The TA project aimed to enhance services to victims by strengthening the infrastructure and quality of hospital-based programs.

34. The termination of Award 2 halts this program's important work, which in turn, reduces the effectiveness of VPPs and HVIP staff to intervene and reduce violence in hospitals. As a result of the termination of the grant, hospitals will have diminished capacity to address the comprehensive needs of victims of crime, thereby leading to less coordinated, more fragmented victim services and increased risks at hospital emergency departments. As of April 22, 2025, programs were in the process of completing needs assessments and developing individualized technical assistance plans. In addition, the AHVS grant provided support to programs to standardize their operations to the Standards and Indicators for HVIPs framework and align to HVIP model fidelity. The sustainability of these programs is uncertain.

35. The termination of Award 2 also diminishes staff development for violence prevention professionals in HVIPs. The project's technical assistance elevates and professionalizes the role of the VPP in their hospitals by building their confidence and skills to engage with multidisciplinary teams to promote coordination that wraps services around victims seeking care. The programs lose an irreplaceable pipeline to promote and amplify the role and leadership of VPPs. This impacts their ability to respond to victims of violent crimes when they present to hospital and community settings.

Award 3: MA Community Violence Intervention Capacity Building Initiative (BoostCVI)

36. HRiA received this $4,000,000 award to build capacity among organizations in the Massachusetts CVI ecosystem. The grant was intended to support CBOs engaged in CVI work; small, grassroots organizations were strongly encouraged to apply. Often, grassroots CVI organizations led by leaders with the closest ties to community do effective work interrupting and preventing violence on the ground; yet these same organizations often lack the financial, administrative, and organizational capacity to apply for large federal grants.

37. Five sub-recipient organizations were selected for this award through a competitive RFP process and were awarded $250,000 over the course of 24 months to address capacity needs. Organizations were awarded funds to achieve specific capacity building goals with support from HRiA, examples of which include standing up a new CVI program in an underserved area of the state, expanding existing CVI work to a nearby community in need, and developing organizational infrastructure to serve new populations. HRiA also planned extensive training and technical assistance for a cohort of organizations, including financial capacity building, developing organizational leadership, and training in intervention and outreach best practices.

38. In addition to capacity building around each sub-recipient's specific objectives, the program aimed to develop each organization's capacity to apply for state and federal grants and thus strengthen the sustainability of the CVI ecosystem in Massachusetts.

39. HRiA relied on funding from this award to fund two new roles, created in 2024, and to hire two new staff to work full-time on this project.

40. HRiA was also in the process of completing capacity assessments for each of the BoostCVI sub-recipients and implementing technical assistance plans to meet their needs. In addition to individualized technical assistance, HRiA had five cohort-specific trainings scheduled between late April and early July covering supervision, financial planning, organizational culture and CVI best

practices, and development and diversifying funding streams. HRiA secured internal and external consultants to lead each of these trainings. In addition to sub-recipients not receiving the training they were promised, the abrupt cancellation of these trainings due to the withdrawal of funding means that these consultants also lost income and wasted time preparing to lead these trainings.

41. In addition to capacity building efforts, as part of this award, HRiA was in the process of developing a web-based resource compendium, highlighting local and national CVI resources, implementation guides, and research. This website was intended to serve as a resource for both BoostCVI sub-recipients and the field at-large. The website was close to launch when the award was terminated, with many hours of work by the web and program team already completed.

Harms to Sub-Recipients at the Community Level

42. The termination of BoostCVI (Award #3) has completely deprived certain Massachusetts communities of any CVI resources or CVI focused organizations. Because termination interrupted HRiA's capacity and infrastructure building, many of the subrecipients were forced to reduce or completely halt their community-based violence intervention and prevention work. The result has, and will continue to have, a devastating impact on the communities who relied on these organizations, particularly the youth and young adults that four out of the five subrecipients served. Several frontline workers funded through the grant have already been laid off. Halting programs and services damage the reputation of HRiA and the subrecipients and erodes years of trust built between these organizations and their communities.

BoostCVI Sub-Recipient 1: Reducing Gun Violence through Direct Intervention Strategies

43. Through the BoostCVI award, HRiA awarded $250,000, beginning October 1, 2024 to September 30, 2026, to a CBO serving a violence-impacted population primarily consisting of Latino/a/x individuals aged 14-35 in a Massachusetts city where many residents face socioeconomic challenges (e.g., limited access to education, healthcare, and stable employment) and reside in

neighborhoods where community resources are insufficient. The organization collaborates with a coalition of community organizations to assist at-risk individuals in navigating the maze of available resources and participate in juvenile justice reform efforts to ensure appropriate placement for youth based on their needs. Though this community faces a higher rate of gun violence than Massachusetts as a whole, they do not yet have a community violence intervention and prevention outreach program.

44. The BoostCVI award aimed to stand up a CVI program run by this organization within the city to deepen engagement with proven-risk priority populations and reduce gun violence through direct intervention strategies. To achieve the goals of this award, this organization hired a program manager tasked with starting their new violence intervention program. The organization made a promise to the community to start developing CVI programming and outreach efforts and hired this program manager based on his extensive history of doing this type of work within the community and accompanying ties to individuals involved in community violence.

45. After a program manager was hired and started his role, the HRiA team immediately conducted a technical assistance session on site and had several more planned, including a multi-day, individualized shadowing session at a partner program. This program manager immediately began forging relationships with law enforcement and the new police chief in the city, drawing on his existing connections to develop strong working relationships to further CVI efforts. The organization was also in the process of bringing on three peer mediators – individuals in the community who would be trained by the program manager to conduct outreach and prevent violence. The program manager additionally brought on teachers, coaches, and other school-based staff to assist with school violence prevention efforts.

46. Unfortunately, because of the Award 3 termination, the organization had to lay off the program manager and halt all of it CVI efforts. Without a program manager, the team has lost both the financial resources and direct subject matter expertise to create a CVI program. And because there

are no other organizations doing CVI work in this city, violence intervention and prevention efforts simply do not exist there as a consequence of the grant termination. Though HRiA was poised to provide this organization with additional training and support, it can no longer deliver that assistance. Consequently, this community—which agreed that violence was impacting individuals at all levels within the city, from directly involved individuals to children and the elderly who faced fear of exposure to violence when out in the community—will certainly face more violence as a result.

BoostCVI Sub-Recipient 2: Strengthening Organizational Infrastructure to Interrupt Community Violence

47. Through the BoostCVI award, HRiA awarded $250,000, beginning October 1, 2024 to September 30, 2026, to an organization that focuses on young adult men who have experienced community violence involvement or incarceration. This organization aimed to build infrastructure to address emerging needs more effectively, improve organizational efficiency, and increase impact within the community via innovative programs. This sub-recipient specifically hoped to hire new and reorganize existing staff to build capacity. They were also in the process of hiring a development consultant to assist with fundraising to sustain their efforts.

48. The termination of this grant has caused a massive ecosystem disruption to the organization's services, and resultingly, to the city's CVI efforts. A core part of this sub-recipient's approach was to build partnerships across the CVI ecosystem and to work toward a comprehensive, integrated model for CVI, including building a strong relationship with their local police department. However, the loss of funding exacerbates tension between CBOs and police departments and communicates to the larger community that CVI work and law enforcement priorities are incompatible. This undermines the holistic and collaborative approach that both parties are working toward and will ultimately have the effect of reducing violence intervention in their community.

49. Further, without grant funding, the organization no longer has access to training and capacity building on youth development, restorative justice, community building, and other topics through this grant from HRiA and their training partners. The organization could not hire a development consultant, was forced to cancel an existing contract with an operations consultant, and ended their evaluation plans for future improvement and expansion.

BoostCVI Sub-Recipient 3: Empowering High- and Proven-risk Youth to Reach a Positive Purpose

50. BoostCVI's third $250,000 grant went to an organization that aims to empower and motivate youth through outreach, community involvement, life skills programs, and technical assistance in navigating the juvenile court system, beginning October 1, 2024 to September 30, 2026. This organization prioritizes youth ages 12-24 who are at highest risk or proven risk of being presently involved in community violence, drug addiction, and/or court involvement. This awardee hired Outreach Advocates to conduct outreach throughout their city and via court referrals, and upon request by a District Attorney's office, planned to expand the work to another neighboring city.

51. With the termination in funding, the organization had to immediately reduce serving young people in that city, and they have already had to furlough one staff member tasked with leading this work. This staff member had strong relationships with young people at highest risk, and the immediate withdrawal of her support has impacted their trust in programs. The organization describes a sense of uncertainty among the young people as to whether they will be able to continue receiving services. The organization describes that post-termination, there is great stress and a strong sense of uncertainty as to whether work in this city can continue at all.

52. Further, termination has impacted their relationship with other programs and entities (including their relationship with correctional facilities and the Department of Youth Services) because the organization has been forced to turn young people away from their services or refer them to other

youth-serving organizations who may not have the specialized skills that they do. Similar to the other sub-recipients, this organization was in the process of receiving training from HRiA on a variety of topics and made great strides in financial and organizational infrastructure improvements (e.g., moving from paper forms to an online system for data entry, developing strong financial systems, etc.). However, now they are experiencing a lack of support while these changes are still in process, which puts them in a precarious position. This grant is the largest they have received in their history; while it was a huge milestone for them to receive these funds to be able to take on the aforementioned efforts and further their mission, the loss of this funding has devastated their work and the individuals they serve.

BoostCVI Sub-Recipient 4: Breaking the Cycle of Violence and Recidivism for Justice-Involved Youth and Young Adults

53. Under the BoostCVI award, HRiA granted $250,000, beginning October 1, 2024 to September 30, 2026, to a sub-recipient located in cities across the state of Massachusetts. The subrecipient employs a variety of holistic and coordinated CVI interventions attending to the multiple needs of individuals at high risk of gang and gun violence. Recognizing that the profile for those who are at the highest risk for violence and recidivism varies, this CBO's intervention strategies address substance use, lack of education or employment, housing instability, and deficient coping behaviors to address the accumulation of risk factors that increase the risk for violence. Before termination, funds were being planned for new programming and expansion, as well as for piloting a Credible Messenger Mentoring program where staff were being trained to mitigate violence as it is happening or prior to violence breaking out. All of these efforts have now come to a halt due to the termination.

54. At the time of termination, this sub-recipient was building connections in a Massachusetts city that is badly in need of robust violence interruption services. Prior to this funding, the organization did not operate in this city. This funding allowed them to have a designated staff

person in this city to devote time to this work. Young people who were at high risk have had very positive results from engaging with the dedicated staff member, including reduced recidivism and adherence to program requirements. Unfortunately, the loss of dedicated funding forced the sub-recipient to reassign staff, interrupting the progress made and hard-won trust built with young people and the broader community. When communities see growth that is abruptly halted, the impact is significant because young people rely on that trust and consistency.

55. As with all other sub-recipients, this organization was receiving training and TA on a variety of prioritized and customized topics from HRiA to further develop their project. While their team has strong professional and lived experience, the sudden loss of supervision resources, professional development, and access to trainings interrupts their staff's ability to do high quality work. HRiA was also providing access to data collection and case management software, and though that access helped them to get positive traction around clean data reporting, the halt in this funding means that access will end abruptly instead of continuing until Fall 2026 as promised. In addition, they were in the process of acquiring physical space to better serve young people. However, without funding, staff supported by this initiative are unable to do their work and lack the TA support to reach their capacity building and programmatic goals. They are unlikely to be able to acquire the physical space that they were exploring.

56. Finally, the termination of this funding impacts cohesion between the organization and other partners. In addition to the formal learning they participated in together, frequently convening with other sub-recipients and benefitting from access to each other's networks were very impactful for this organization, and loss of access has hindered their ability to effectively and seamlessly partner.

BoostCVI Sub-Recipient 5: Building Organizational Capacity to Work with Court Involved, Incarcerated, and Returning Citizens

57. Finally, HRiA granted $250,000, beginning October 1, 2024 through September 2026, to a sub-recipient that serves youth and adults who have been inordinately impacted by violence and are currently incarcerated or formerly incarcerated and returning to the community. The need for their services keeps increasing, so for this grant, they aimed to focus on organizational capacity building to keep up with the demand for this work and support additional work inside jails and prisons. This organization's capacity building goals under the grant aimed to focus on program evaluation and data collection, organizational development and strategic planning, and fundraising.

58. The termination of this grant halts the training and technical assistance from HRiA and other external consultants that would strengthen organizational capacity to meet the demand for their services. The organization had committed a significant amount of funding towards consultants to assist with general strategic planning, organizational development, and financial planning, and are scrambling to find replacement funding to meet these commitments. HRiA was working closely with them on financial planning and abruptly had to cease support. Without this funding and support from HRiA, it is unlikely that this organization can reach its goal and meet the increasing needs across the state.

59. The consequences of this funding termination has rippled far beyond the direct impact: the organization shares that their fiscal sponsor has become very cautious based on funding uncertainties, and the organization has had to cut the budget by 25 percent. While they were poised to hire seven additional staff this year through both HRiA funding and other funding sources, they are now only able to hire one, due to both funding impacts and the sense of fear within the field and increased competitiveness around any available funding. As a smaller organization, they are concerned that they will not be competitive for other funding sources, especially without HRiA support.

60. Organizational leadership for this sub-recipient includes individuals with positive and impactful relationships with leadership in jails and prisons across Massachusetts, as well as staff with

expertise serving "youthful offenders," which is especially needed given the new Massachusetts law allowing individuals who were sent to prison as juveniles to be eligible for parole. Unfortunately, the termination of this grant directly imperils staff from the very communities the organization seeks to serve. The organization anticipates hundreds of young people, who have never spent a day outside of prison as adults, coming home within the next two years and needing to re-integrate into the community. This time is critical, because people are almost always at the highest risk of recidivism and harm when they return home from prison. This organization currently serves 100 young people and was poised to double their reach to 200 within the next year; however, this is no longer possible with the funding termination.

61. The organization was also poised to grow their partnership with the Department of Youth Services (DYS) to serve more justice-involved young people. DYS was eager to further engage this organization due to the impact they have already seen previously. This organization is an important part of the ecosystem and is well-prepared to engage with these individuals to prevent future violence and crime; however, without this funding, they are no longer positioned to do so.

Date: May 21, 2025



Steven Ridini
President and CEO of HRiA
Suffolk County, Massachusetts

EXHIBIT 1

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	HEALTH RESOURCES IN ACTION, INC. 2 BOYLSTON STREET 4TH FLOOR
City, State and Zip:	BOSTON, MA 02116
Recipient UEI:	FPD3JRJ61WJ2

Project Title: The HAVI: Building Trauma informed Practices and Workforce Development for the CVI field	**Award Number:** 15PBJA-24-GK-04067-CVIP

Solicitation Title: BJA FY24 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative Training and Technical Assistance Program

Federal Award Amount: $2,500,000.00	**Federal Award Date:** 9/26/24

Awarding Agency:	Office of Justice Programs Bureau of Justice Assistance
Funding Instrument Type:	CA

Opportunity Category: D
Assistance Listing:
16.045 - Community-Based Violence Intervention and Prevention Initiative

Project Period Start Date: 10/1/24	**Project Period End Date:** 9/30/27
Budget Period Start Date: 10/1/24	**Budget Period End Date**: 9/30/27

Project Description:
The Health Alliance for Violence Intervention (HAVI) proposes to implement the HAVI Trauma Informed and Workforce Development training and technical assistance (TTA) project to advance and grow the essential workforce of Community Violence Intervention (CVI) workers. This project will expand professional and educational opportunities for CVI workers and transform their environments just as they do for the individuals and communities that they support. The project will involve experienced and trusted CVI workers employed as consultants and subject matter experts in the creation of competencies and resources for developing the workforce, addressing vicarious trauma, and instituting organizational practices that promote well-being. CVI workers and HAVI staff will be part of the project team and co-create messaging and resource materials that will influence and operationalize trauma-informed organizational frameworks. The HAVI will provide: (1) Tailored TTA (assessment, guidance, consultation, strategic planning, program development, and coaching) to individual Community Violence Intervention and Prevention Initiative (CVIPI)-funded organizations and other interested sites; (2) Cohort-based, peer-to-peer learning in communities of practice on topics including equitable staff development, vicarious trauma and trauma-informed practices (3) Trainings, conferences and convenings that will provide opportunities for CVI workers to grow their skills and knowledge; (4) Development and dissemination of training materials and knowledge products; and (5) Continuous evaluation, self-assessment and quality improvement. The expected project outcomes are the creation and dissemination of a robust set of trauma-informed and vicarious trauma resources and workforce development strategies tailored to CVI organizations and workers, CVI workers' skill development through participation in the project, conferences, convenings, trainings and technical assistance, and movement in the field toward organizational practices and infrastructures that both address vicarious trauma and promote career advancement for CVI workers.

Award Letter

September 26, 2024

Dear Amber Ross,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by HEALTH RESOURCES IN ACTION, INC. for an award under the funding opportunity entitled 2024 BJA FY24 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative Training and Technical Assistance Program. The approved award amount is $2,500,000. Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Brent J. Cohen
Acting Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) enforces federal civil rights laws and other provisions that prohibit discrimination by recipients of federal financial assistance from OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW).

Several civil rights laws, including Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance (recipients) to give assurances that they will comply with those laws. Taken together, these and other civil rights laws prohibit recipients from discriminating in the provision of services and employment because of race, color, national origin, religion, disability, and sex or from discriminating in the provision of services on the bases of age.

Some recipients of DOJ financial assistance have additional obligations to comply with other applicable nondiscrimination provisions like the Omnibus Crime Control and Safe Streets Act of 1968, which prohibits discrimination on the basis of religion in addition to race, color, national origin, and sex. Recipients may also have related requirements regarding the development and implementation of equal employment opportunity programs.

OCR provides technical assistance, training, and other resources to help recipients comply with civil rights obligations. Further, OCR administratively enforces civil rights laws and nondiscrimination provisions by investigating DOJ recipients that are the subject of discrimination complaints. In addition, OCR conducts compliance reviews of DOJ recipients based on regulatory criteria. These investigations and compliance reviews permit OCR to evaluate whether DOJ recipients are providing services to the public and engaging in employment practices in a nondiscriminatory manner.

For more information about OCR, your civil rights and nondiscrimination responsibilities, how to notify your employees or beneficiaries of their civil rights protections and responsibilities and how to file a complaint, as well as technical assistance, training, and other resources, please visit www.ojp.gov/program/civil-rights-office/outreach. If you would like OCR to assist you in fulfilling your civil rights or nondiscrimination responsibilities, please contact us at askOCR@ojp.usdoj.gov or www.ojp.gov/program/civil-rights-office/about#ocr-contacts.

Memorandum Regarding NEPA

NEPA Letter Type

OJP - Categorical Exclusion

NEPA Letter

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third party action:

(1) New construction

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species

(3) A renovation that will change the basic prior use of a facility or significantly change its size

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment

(5) Implementation of a program involving the use of chemicals (including the

identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or Orbin Terry, Environmental Coordinator for the Bureau of Justice Assistance.

NEPA Coordinator

First Name	Middle Name	Last Name
Orbin		Terry

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
HEALTH RESOURCES IN ACTION, INC.

UEI
FPD3JRJ61WJ2

Street 1
2 BOYLSTON STREET 4TH FLOOR

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BOSTON

State/U.S. Territory
Massachusetts

Zip/Postal Code
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Country
United States

County/Parish

Province

Award Details

Federal Award Date
9/26/24

Award Type
Initial

Award Number
15PBJA-24-GK-04067-CVIP

Supplement Number
00

Federal Award Amount
$2,500,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.045	Community-Based Violence Intervention and Prevention Initiative

Statutory Authority
Bipartisan Safer Communities Supplemental Appropriations Act, 2022 (Pub. L. No. 117-159, 136 Stat. 1313, 1339); 28 U.S.C. 530C
Department of Justice Appropriations Act, 2024 (Pub. L. No. 118-42, 138 Stat. 25, 149)

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title

2024 BJA FY24 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative Training and Technical Assistance Program

Awarding Agency

OJP

Program Office

BJA

Application Number

GRANT14220959

Grant Manager Name

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Project Title

The HAVI: Building Trauma informed Practices and Workforce Development for the CVI field

Performance Period Start Date

10/01/2024

Performance Period End Date

09/30/2027

Budget Period Start Date

10/01/2024

Budget Period End Date

09/30/2027

Project Description

The Health Alliance for Violence Intervention (HAVI) proposes to implement the HAVI Trauma Informed and Workforce Development training and technical assistance (TTA) project to advance and grow the essential workforce of Community Violence Intervention (CVI) workers. This project will expand professional and educational opportunities for CVI workers and transform their environments just as they do for the individuals and communities that they support. The project will involve experienced and trusted CVI workers employed as consultants and subject matter experts in the creation of competencies and resources for developing the workforce, addressing vicarious trauma, and instituting organizational practices that promote well-being. CVI workers and HAVI staff will be part of the project team and co-create messaging and resource materials that will influence and operationalize trauma-informed organizational frameworks. The HAVI will provide: (1) Tailored TTA (assessment, guidance, consultation, strategic planning, program development, and coaching) to individual Community Violence Intervention and Prevention Initiative (CVIPI)-funded organizations and other interested sites; (2) Cohort-based, peer-to-peer learning in communities of practice on topics including equitable staff development, vicarious trauma and trauma-informed practices (3) Trainings, conferences and convenings that will provide opportunities for CVI workers to grow their skills and knowledge; (4) Development and dissemination of training materials and knowledge products; and (5) Continuous evaluation, self-assessment and quality improvement. The expected project outcomes are the creation and dissemination of a robust set of trauma-informed and vicarious trauma resources and workforce development strategies tailored to CVI organizations and workers, CVI workers' skill development through participation in the project, conferences, convenings, trainings and technical assistance, and movement in the field toward organizational practices and infrastructures that both address vicarious trauma and promote career advancement for CVI workers.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

1

Meaningful access requirement for individuals with limited English proficiency

The recipient, and any subrecipient at any tier, must take reasonable steps to ensure that individuals with limited English proficiency (LEP) have meaningful access to their programs and activities to comply with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of national origin, including discrimination against individuals with LEP. Such steps may require providing language assistance services, such as interpretation or translation services. The Department of Justice guidance on compliance with this requirement may be found at "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (67 Fed. Reg. 41455-41472) (https://www.federalregister.gov/d/02-15207) and is incorporated by reference here.

2

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2024)
The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions that may be set out in applicable appropriations acts are indicated at https://ojp.gov/funding/Explore/FY24AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

3

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

4

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted

and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this award from OJP.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

5

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

6

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38.

Among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38 also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

Recipients and subrecipients that provide social services under this award must give written notice to beneficiaries and prospective beneficiaries prior to the provision of services (if practicable) which shall include language substantially similar to the language in 28 CFR Part 38, Appendix C, sections (1) through (4). A sample written notice may be found at https://www.ojp.gov/program/civil-rights-office/partnerships-faith-based-and-other-neighborhood-organizations.

In certain instances, a faith-based or religious organization may be able to take religion into account when making hiring decisions, provided it satisfies certain requirements. For more information, please see https://www.ojp.gov/funding/explore/legaloverview2024/civilrightsrequirements.

7

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

8

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

9

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

10

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

11

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

Among other items, 28 C.F.R. § 42.106(d), 28 C.F.R. § 42.405(c), and 28 C.F.R. § 42.505(f) contain notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

12

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

13

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

14

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

15

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

16

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

17

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the

nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

18

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

19

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

20

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

21

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

22

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

23

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

24

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

25

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

26

Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety,” OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient (“subgrantee”) at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the “controlled equipment” list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition: Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

27

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

28

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

29

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

Among other items, 28 C.F.R. § 54.140 contains notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

30

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

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Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period

of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

32

Any Web site that is funded in whole or in part under this award must include the following statement on the home page, on all major entry pages (i.e., pages (exclusive of documents) whose primary purpose is to navigate the user to interior content), and on any pages from which a visitor may access or use a Web-based service, including any pages that provide results or outputs from the service: "This Web site is funded in whole or in part through a grant from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)." The full text of the foregoing statement must be clearly visible on the home page. On other pages, the statement may be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

33

Confidentiality of data

The recipient (and any subrecipient at any tier) must comply with all confidentiality requirements of 34 U.S.C. 10231 and 28 C.F.R. Part 22 that are applicable to collection, use, and revelation of data or information. The recipient further agrees, as a condition of award approval, to submit a Privacy Certificate that is in accord with requirements of 28 C.F.R. Part 22 and, in particular, 28 C.F.R. 22.23.

34

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

35

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

36

Protection of human research subjects

The recipient (and any subrecipient at any tier) must comply with the requirements of 28 C.F.R. Part 46 and all OJP policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.

37

Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

38

Recipient understands and agrees not to engage in activities constituting organizational conflicts of interest, such as bidding on specifications it guided as part of the provision of training and technical assistance under this award. Actions that may give rise to organizational conflicts of interest under awards are described in the Procurement Standards in 2 C.F.R. Part 200 (the Part 200 Uniform Requirements) and the DOJ Grants Financial Guide. Prior approval from the grant manager is required for any work with an organization or entity that would receive training or technical assistance under this award.

39

Required attendance at BJA-sponsored events

The recipient (and its subrecipients at any tier) must participate in BJA-sponsored training events, technical assistance events, or conferences held by BJA or its designees, upon BJA's request.

40

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the BJA has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and BJA's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and BJA will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, BJA, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with BJA. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and BJA. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

41

The Project Director and/or any other key program personnel designated in the application shall be replaced only for compelling reasons. Successors to key personnel must be approved by OJP, and such approval is contingent upon submission of appropriate information, including, but not limited to, a resume. Changes in program personnel, other than key personnel, require only notification to OJP and submission of resumes, unless otherwise designated in the award document.

42

The recipient's budget (and budget narrative) is pending clearance by OJP.

Prior to budget clearance (and unless there is a more restrictive condition on this award, in which case the terms of that more restrictive condition apply): The recipient may not drawdown more than 10% of the award. Pre-clearance obligations, expenditures, and drawdowns may be disallowed if not in compliance with program requirements.

The recipient should be judicious in using award funds prior to budget clearance. Generally, OJP expects that recipients (depending on the specific project scope) may need to advertise for award-funded positions, pay personnel and fringe benefits for positions budgeted under the award, plan for project activities, attend training and pay training-related travel needed to begin the project, and engage in other limited activities conducted by recipient staff (i.e., generally not requiring a subaward or procurement contract under an award).

OJP will issue an Award Condition Modification upon budget clearance.

43

The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

44

The recipient agrees that no funds under this grant award (including via subcontract or subaward, at any tier) may be used for unmanned aircraft systems (UAS), which includes unmanned aircraft vehicles (UAV), or for any accompanying accessories to support UAS.

45

The recipient agrees to budget funds for one staff representative to attend BJA's Annual Training and Technical Assistance Providers' Meeting once a year for two to three (2-3) days in Washington, D.C. In addition, the recipient agrees to participate in BJA training events, technical assistance events, or conferences held by BJA or its designees, upon request.

46

The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJA's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).

47

The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.

48

The recipient agrees to submit to BJA for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award at least thirty (30) working days prior to the targeted dissemination date. The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities. Any products developed under this award, (with the exception of press releases, web sites, and mobile applications), shall contain the following statements: “This project was supported by Grant No. <Award_Number> awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." (Note: A separate disclaimer has been developed and is required for web sites and mobile applications. No disclaimer is required for press releases.)

49

The recipient agrees to track and report to BJA on its training and technical assistance activities and deliverables progress using the guidance and format provided by BJA.

50

The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

51

The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

52

Verification and updating of recipient contact information

The recipient must verify its Grant Award Administrator, Financial Manager, and Authorized Representative contact information in JustGrants, including telephone number and e-mail address. If any information is incorrect or has changed, the award recipient’s Entity Administrator must make changes to contact information through DIAMD. Instructions on how to update contact information in JustGrants can be found at https://justicegrants.usdoj.gov/training/training-entity-management.

53

Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration

and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Acting Assistant Attorney General	Brent J. Cohen	9/24/24 5:49 PM

Authorized Representative

Declaration and Certification

Entity Acceptance

Title of Authorized Entity Official
Contracts Administrator

Name of Authorized Entity Official
Amber Ross

Signed Date And Time
9/27/2024 4:48 PM

EXHIBIT 2

Subject: Notice of Award Termination

Office of Justice Programs <OJP_COMMS@public.govdelivery.com> Tue, Apr 22, 5:31 PM
to Amber Ross

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 22, 2025

Subject: Termination of Award

Based on a careful review, the award listed immediately below is hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number: 15PBJA-24-GK-04067-CVIP

As provided, respectively, in the award itself, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800, apply to this award. Specifically, the award document provides notice of the applicability of the termination provisions in § 200.340.

This award is being terminated because it "no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice, other than pursuant to closeout responsibilities.

Effective date: April 22, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 calendar days of the date of this notice. Unless the Assistant Attorney General for the Office of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

(End of Notice)

You received this email because you are a current or previous Department of Justice grant applicant or award recipient. GovDelivery is providing this service on behalf of the Department of Justice and may not use your subscription information for any other purposes. For more information, review the Department of Justice Privacy Policy and the GovDelivery Privacy Policy.

This email was sent to aross@hria.org using GovDelivery Communications Cloud on behalf of Department of Justice · Washington, DC

GOVDELIVERY

EXHIBIT 3

Department of Justice (DOJ)

Office of Justice Programs

Office for Victims of Crime

Washington, D.C. 20531

Name and Address of Recipient:	HEALTH RESOURCES IN ACTION, INC. 2 BOYLSTON STREET 4TH FLOOR
City, State and Zip:	BOSTON, MA 02116
Recipient UEI:	FPD3JRJ61WJ2
Project Title: Health Alliance for Violence Intervention Comprehensive Training and Technical Assistance for Advancing Hospital-Based Victim Services	**Award Number:** 15POVC-22-GK-00557-NONF
Solicitation Title: OVC FY 2022 Invited to Apply - Advancing Hospital-Based Victim Services Technical Assistance Project	
Federal Award Amount: $500,000.00	**Federal Award Date:** 8/18/22
Awarding Agency: **Award Type:** **Suppliment Number:** **Funding Instrument Type:**	Office of Justice Programs Office for Victims of Crime Initial 00 CA
Opportunity Category: D **Assistance Listing:** 16.582 - Crime Victim Assistance/Discretionary Grants	
Project Period Start Date: 10/1/22	**Project Period End Date:** 9/30/24
Budget Period Start Date: 10/1/22	**Budget Period End Date**: 9/30/24

Project Description:

The Health Alliance for Violence Intervention (HAVI) will advance the short- and long-term sustainability of hospital-based victim services by providing tailored and comprehensive technical assistance and training to the AHVS grantee sites. This Technical Assistance Project will enhance services to victims by strengthening the infrastructure and quality of hospital-based programs. The HAVI will provide an array of technical assistance resources with an emphasis on programmatic capacity-building, detailed evaluation plans, data-driven outcomes, trauma-informed and healing-centered care, cultural responsiveness, racial equity and strategic partnerships. The HAVI will facilitate peer learning communities across the sites, OVC, and its expansive US network of hospital-based violence intervention programs, focusing on key content areas including: workforce development; mental health; research and evaluation; policy; law enforcement; and empowering the frontline of Violence Prevention Professionals (VPPs). Leadership development for VPPs and narrative change about violent victimization will benefit victims and lead to systems transformation. The HAVI will provide training to VPPs to increase their skills and capacity to respond to the complex needs of victims, and to supervisors of VPPs to promote the professional development and advancement of frontline staff. Hospital-based victims services will receive expert consultation to develop robust sustainability plans. The HAVI will generate model policies and guidance documents, disseminate information about best practices, foster cross-sector collaboration and share the innovative learning from this project to bolster and expand the field of victim services.

Award Letter

August 18, 2022

Dear Oliver Souyavong,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by HEALTH RESOURCES IN ACTION, INC. for an award under the funding opportunity entitled 2022 OVC FY 2022 Invited to Apply - Advancing Hospital-Based Victim Services Technical Assistance Project. The approved award amount is $500,000.
Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Maureen Henneberg
Deputy Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see https://ojp.gov/funding/Explore/LegalOverview/CivilRightsRequirements.htm.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria. These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department

are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOPs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEOP requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type
OJP - Categorical Exclusion

NEPA Letter
This award supports OVC's Advancing Hospital-Based Victim Services Technical Assistance Project efforts run by the Health Alliance for Violence Interventio (HAVI). The HAVI will use this funding to continue to strengthen the infrastructure and quality of hospital-based programs to enhance services for victims, improve victim outcomes and prevent further victimization.

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third-party action:

(1) New construction

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species

(3) A renovation that will change the basic prior use of a facility or significantly change its size

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment

(5) Implementation of a program involving the use of chemicals (including the identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or the NEPA Coordinator for OVC.

NEPA Coordinator

First Name	Middle Name	Last Name
Zoe	E	French

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
HEALTH RESOURCES IN ACTION, INC.

UEI
FPD3JRJ61WJ2

Street 1
2 BOYLSTON STREET 4TH FLOOR

Street 2

City
BOSTON

State/U.S. Territory
Massachusetts

Zip/Postal Code
02116

Country
United States

County/Parish

Province

Award Details

Federal Award Date
8/18/22

Award Type
Initial

Award Number
15POVC-22-GK-00557-NONF

Supplement Number
00

Federal Award Amount
$500,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.582	Crime Victim Assistance/Discretionary Grants

Statutory Authority
34 U.S.C. 20103(c)(1)(A)

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title

2022 OVC FY 2022 Invited to Apply - Advancing Hospital-Based Victim Services Technical Assistance Project

Awarding Agency
OJP

Program Office
OVC

Application Number
GRANT13660294

Grant Manager Name
Sharron Fletcher
Phone Number
202-305-2358
E-mail Address
Sharron.Fletcher@usdoj.gov

Project Title
Health Alliance for Violence Intervention Comprehensive Training and Technical Assistance for Advancing Hospital-Based Victim Services

Performance Period Start Date
10/01/2022

Performance Period End Date
09/30/2024

Budget Period Start Date
10/01/2022

Budget Period End Date
09/30/2024

Project Description
The Health Alliance for Violence Intervention (HAVI) will advance the short- and long-term sustainability of hospital-based victim services by providing tailored and comprehensive technical assistance and training to the AHVS grantee sites. This Technical Assistance Project will enhance services to victims by strengthening the infrastructure and quality of hospital-based programs. The HAVI will provide an array of technical assistance resources with an emphasis on programmatic capacity-building, detailed evaluation plans, data-driven outcomes, trauma-informed and healing-centered care, cultural responsiveness, racial equity and strategic partnerships. The HAVI will facilitate peer learning communities across the sites, OVC, and its expansive US network of hospital-based violence intervention programs, focusing on key content areas including: workforce development; mental health; research and evaluation; policy; law enforcement; and empowering the frontline of Violence Prevention Professionals (VPPs). Leadership development for VPPs and narrative change about violent victimization will benefit victims and lead to systems transformation. The HAVI will provide training to VPPs to increase their skills and capacity to respond to the complex needs of victims, and to supervisors of VPPs to promote the professional development and advancement of frontline staff. Hospital-based victims services will receive expert consultation to develop robust sustainability plans. The HAVI will generate model policies and guidance documents, disseminate information about best practices, foster cross-sector collaboration and share the innovative learning from this project to bolster and expand the field of victim services.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

1

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2022)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2022, are set out at https://ojp.gov/funding/Explore/FY22AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

2

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2022 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2022 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2022 award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

3

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

4

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

5

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after January 1, 2020, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://www.ojp.gov/training/fmts.htm. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

6

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

7

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices:

Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

8

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

Currently, among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38, currently, also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at https://www.ecfr.gov/cgi-bin/ECFR?page=browse), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

9

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

10

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

11

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

12

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

13

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

14

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

15

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

16

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

17

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

18

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

19

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

20

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain

records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

21

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

22

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

23

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

24

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

25

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

26

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

27

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including

requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

28

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

29

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

30

The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

31

The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

32

The recipient agrees to submit a final report at the end of this award documenting all relevant project activities during the entire period of support under this award. This report will include detailed information about the project(s) funded, including, but not limited to, information about how the funds were actually used for each purpose area, data to support statements of progress, and data concerning individual results and outcomes of funded projects reflecting project successes and impacts. The final report is due no later than 120 days following the close of this award period or the expiration of any extension periods. This report will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov/

33

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

34

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

35

The Victims of Crime Act (VOCA) of 1984 states that VOCA funds are available during the federal fiscal year in which the award was actually made, plus the following three fiscal years. At the end of this period, VOCA funds will be deobligated. (E.g., VOCA funds awarded in FY 2022, are available until the end of FY 2025). Extensions beyond the statutory period may be granted at the discretion of DOJ, and may be requested in accordance with OJP processes, but are not assured.

36

The recipient will coordinate its efforts with other similar OVC-funded programs within the relevant jurisdiction in order to enhance the project and avoid duplication of efforts.

37

Justification of consultant rate

Approval of this award does not indicate approval of any consultant rate in excess of $650 per day. A detailed justification must be submitted to and approved by the OJP program office prior to obligation or expenditure of such funds.

38

TTA Awards: Tracking and Reporting Data

The recipient understands and agrees to track and report data on all training and technical assistance activities and deliverables using the guidance, format, or tool provided by the Program Office or OJP.

39

Recipient understands and agrees not to engage in activities constituting organizational conflicts of interest, such as bidding on specifications it guided as part of the provision of training and technical assistance under this award. Actions that may give rise to organizational conflicts of interest under awards are described in the Procurement Standards in 2 C.F.R. Part 200 (the Part 200 Uniform Requirements) and the DOJ Grants Financial Guide. Prior

approval from the grant manager is required for any work with an organization or entity that would receive training or technical assistance under this award.

40

The recipient agrees to submit to OJP for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award, 60 days before its intended publication. The recipient agrees to correct a product in response to comments generated through the OJP peer review process, the internal Department of Justice review process, or as otherwise requested by OJP. Any products developed under this award shall contain the following statement: ?This _____ was produced by _____ under [add grant number], awarded by the [add Awarding Program Office, e.g., Office for Victims of Crime], Office of Justice Programs, U.S. Department of Justice. The opinions, findings, and conclusions or recommendations expressed in this _____ are those of the contributors and do not necessarily represent the official position or policies of the U.S. Department of Justice.? The OJP grant manager will determine whether minor deliverables, such as webinars, one-page flyers and discrete web pages, require review or prior approval by OJP.

41

The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.

42

The recipient may not obligate, expend, or draw down any award funds for indirect costs, unless and until either -- (1) the recipient submits to OJP a current, federally-approved indirect cost rate agreement, or (2) the recipient determines that it is eligible under the Part 200 Uniform Requirements to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and advises OJP in writing of both its eligibility and its election.

The financial review of the budget for this award is pending. If the OJP Office of the Chief Financial Officer (OCFO) determines as part of its financial review that the recipient already has submitted the documentation concerning indirect costs described above, this condition will be released through a Grant Award Condition Modification (ACM) upon completion of the OCFO final budget review.

If the OJP OCFO instead determines as part of its financial review that the recipient has not yet submitted the required documentation concerning indirect costs, this condition will not be released until OJP (including its OCFO) receives and reviews a satisfactory submission.

43

The recipient's budget is pending review and clearance by OJP. Prior to budget clearance, unless prohibited by another condition of this award, the recipient may obligate, expend, and draw down funds for budgeted recipient personnel, fringe benefit, and related operational costs and OVC-mandated travel costs, only, up to 10 percent of the award amount to participate in OJP-required trainings, advertise for new positions, maintain current staffing, plan activities with project staff, and provide victim services. All obligations, expenditures, and drawdowns incurred prior to budget clearance are incurred at the sole risk of the recipient, and must be in compliance with applicable 2 C.F.R. part 200 cost principles and DOJ Financial Guide provisions. The recipient may not draw down additional funds until OCFO has approved the budget and budget narrative, and an Award Condition Modification has been issued removing this award condition. If any other condition on this award prohibits obligation, expenditure, or drawdown of funds to a greater extent than this condition, then that other condition controls.

44

Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

45

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the OVC has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and OVC's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and OVC will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, OVC, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with OVC. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and OVC. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

46

The Project Director and/or any other key program personnel designated in the application shall be replaced only for compelling reasons. Successors to key personnel must be approved by OJP, and such approval is contingent upon submission of appropriate information, including, but not limited to, a resume. Changes in program personnel, other than key personnel, require only notification to OJP and submission of resumes, unless otherwise designated in the award document.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Deputy Assistant Attorney General	Maureen Henneberg	8/15/22 1:58 PM

Authorized Representative

Declaration and Certification

Entity Acceptance

Title of Authorized Entity Official
Contracts Administrator

Name of Authorized Entity Official
Amber Ross

Signed Date And Time
8/23/2022 9:54 AM

Supplement 02

Supplement Award Status : Resolved-SupplementAwardAccepted

Award Letter

September 27, 2023

Dear Amber Ross,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by HEALTH RESOURCES IN ACTION, INC. for an award under the funding opportunity entitled . The approved award amount is $750,000.
Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Amy Solomon
Assistant Attorney General
Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see https://ojp.gov/funding/

Explore/LegalOverview/CivilRightsRequirements.htm.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria. These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOPs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEOP requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type

NEPA Letter

NEPA Coordinator

First Name	Middle Name	Last Name

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
HEALTH RESOURCES IN ACTION, INC.

UEI
FPD3JRJ61WJ2

Street 1
2 BOYLSTON STREET 4TH FLOOR

Street 2

City
BOSTON

State/U.S. Territory
Massachusetts

Zip/Postal Code
02116

Country
United States

County/Parish

Province

Award Details

Federal Award Date
9/27/23

Award Type
Continuation

Award Number
15POVC-22-GK-00557-NONF

Supplement Number
02

Federal Award Amount
$750,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.582	Crime Victim Assistance/Discretionary Grants

Statutory Authority
34 U.S.C. 20103(c)(1)(A)

[ ]
I have read and understand the information presented in this section of the Federal Award Instrument.

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title
OVC FY 2023 Invited to Apply - Advancing Hospital-Based Victim Services Technical Assistance Project

Awarding Agency
OJP

Program Office
OVC

Application Number
GRANT13890151

Grant Manager Name
Sharron Fletcher

Phone Number
202-305-2358

E-mail Address
Sharron.Fletcher@usdoj.gov

Project Title
OVC 2023 Advancing Hospital-based Victim Services

Performance Period Start Date
10/01/2023

Performance Period End Date
09/30/2025

Budget Period Start Date	Budget Period End Date
10/01/2023	09/30/2025

Project Description

The Health Alliance for Violence Intervention (HAVI) will advance the short- and long-term sustainability of hospital-based victim services by providing tailored and comprehensive technical assistance and training to the AHVS grantee sites. This Technical Assistance Project will enhance services to victims by strengthening the infrastructure and quality of hospital-based programs. The HAVI will provide an array of technical assistance resources with an emphasis on programmatic capacity-building, detailed evaluation plans, data-driven outcomes, trauma-informed and healing-centered care, cultural responsiveness, racial equity and strategic partnerships. The HAVI will facilitate peer learning communities across the sites, OVC, and its expansive US network of hospital-based violence intervention programs, focusing on key content areas including workforce development; mental health; research and evaluation; policy; law enforcement; and empowering the frontline of Violence Prevention Professionals (VPPs). Leadership development for VPPs and narrative change about violent victimization will benefit victims and lead to systems transformation. The HAVI will provide training to VPPs to increase their skills and capacity to respond to the complex needs of victims, and to supervisors of VPPs to promote the professional development and advancement of frontline staff. Hospital-based victims services will receive expert consultation to develop robust sustainability plans. The HAVI will generate model policies and guidance documents, disseminate information about best practices, foster cross-sector collaboration and share the innovative learning from this project to bolster and expand the field of victim services.

[ ]
I have read and understand the information presented in this section of the Federal Award Instrument.

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

A financial analysis of budgeted costs has been completed. Costs under this award appear reasonable, allowable, and consistent with existing guidelines. Exceptions / Adjustments are noted below.

Budget Category	Previous Budget	Supplemental Budget	Cumulative Totals
Personnel	$238,143.00	$306,059.00	$544,202.00
Fringe Benefits	$64,857.00	$84,259.00	$149,116.00
Travel	$108,802.00	$209,160.00	$317,962.00
Equipment	$0.00	$0.00	$0.00
Supplies	$3,905.00	$0.00	$3,905.00
Construction	$0.00	$0.00	$0.00
Subawards (subgrants)	$5,000.00	$32,391.00	$37,391.00
Procurement Contracts	$0.00	$0.00	$0.00

Other Costs	$14,147.00	$37,772.00	$51,919.00
Total Direct Costs	$434,854.00	$669,641.00	$1,104,495.00
Indirect Costs	$65,146.00	$80,359.00	$145,505.00
Total Project Costs	$500,000.00	$750,000.00	$1,250,000.00
	$500,000.00	$750,000.00	$1,250,000.00

Project Costs Breakdown

Federal Funds	$500,000.00	$750,000.00	$1,250,000.00
Match Amount			$0.00
Program Income Amount			$0.00

Project Costs Summary

Amount	Percentage
Total Project Costs	
$1,250,000.00	100.00%
Total Federal Funds	
$1,250,000.00	100.00%
Total Match Amount	
$0.00	0.00%
Total Program Income Amount	
$0.00	0.00%

[ ]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Terms And Conditions

1

Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety,” OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient (“subgrantee”) at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the “controlled equipment” list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition: Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

2

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

3

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

4

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2022 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2022 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2022 award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at

any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

5

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

6

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

7

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

8

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2022)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2022, are set out at https://www.ojp.gov/funding/Explore/FY22AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

9

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

Currently, among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious

practice. Part 38, currently, also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at https://www.ecfr.gov/cgi-bin/ECFR?page=browse), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

10

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

11

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

12

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an

equal employment opportunity program.

13

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

14

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm

employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

15

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

16

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

17

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

18

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator

enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

19

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

20

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

21

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

22

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

23

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

24

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

25

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

26

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

27

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

28

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

29

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

30

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

31

The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

32

The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

33

The recipient agrees to submit a final report at the end of this award documenting all relevant project activities during the entire period of support under this award. This report will include detailed information about the project(s) funded, including, but not limited to, information about how the funds were actually used for each purpose area, data to support statements of progress, and data concerning individual results and outcomes of funded projects reflecting project successes and impacts. The final report is due no later than 120 days following the close of this award period or the expiration of any extension periods. This report will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov/

34

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

35

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

36

The Victims of Crime Act (VOCA) of 1984 states that VOCA funds are available during the federal fiscal year in which the award was actually made, plus the following three fiscal years. At the end of this period, VOCA funds will be deobligated. (E.g., VOCA funds awarded in FY 2023, are available until the end of FY 2026). Extensions beyond the statutory period may be granted at the discretion of DOJ, and may be requested in accordance with OJP processes, but are not assured.

37

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the OVC has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and OVC's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and OVC will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, OVC, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with OVC. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and OVC. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

38

The recipient will coordinate its efforts with other similar OVC-funded programs within the relevant jurisdiction in order to enhance the project and avoid duplication of efforts.

39

Justification of consultant rate

Approval of this award does not indicate approval of any consultant rate in excess of $650 per day. A detailed justification must be submitted to and approved by the OJP program office prior to obligation or expenditure of such funds.

40

TTA Awards: Tracking and Reporting Data

The recipient understands and agrees to track and report data on all training and technical assistance activities and deliverables using the guidance, format, or tool provided by the Program Office or OJP.

41

Recipient understands and agrees not to engage in activities constituting organizational conflicts of interest, such as bidding on specifications it guided as part of the provision of training and technical assistance under this award. Actions that may give rise to organizational conflicts of interest under awards are described in the Procurement Standards in 2 C.F.R. Part 200 (the Part 200 Uniform Requirements) and the DOJ Grants Financial Guide. Prior approval from the grant manager is required for any work with an organization or entity that would receive training or technical assistance under this award.

42

The recipient (and any "subrecipient" at any tier) must have written policies and procedures in place that address how it will maintain the confidentiality of victims' names, addresses, telephone numbers, or any other identifying information, including how this information will be protected when there is information sharing between partners. In addition, the recipient must submit a signed, written certification that data privacy and sharing protocols comport with the confidentiality and privacy rights and obligations of federal law or the grantee jurisdiction's laws, court rules, or rules of professional conduct applicable to the work performed by the recipient. The recipient agrees to provide to OJP all documentation as required for grant monitoring purposes.

43

Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

44

Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

[ ]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted

(including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Assistant Attorney General	Amy Solomon	9/21/23 1:25 PM

Authorized Representative

Entity Acceptance

Title of Authorized Entity Official
Contracts Administrator

Signed Date And Time

Supplement 02

EXHIBIT 4

Subject: Notice of Award Termination

Office of Justice Programs <OJP_COMMS@public.govdelivery.com> Tue, Apr 22, 5:31PM
to Amber Ross

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 22, 2025

Subject: Termination of Award

Based on a careful review, the award listed immediately below is hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number: 15POVC-22-GK-00557-NONF

As provided, respectively, in the award itself, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800, apply to this award. Specifically, the award document provides notice of the applicability of the termination provisions in § 200.340.

This award is being terminated because it "no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice, other than pursuant to closeout responsibilities.

Effective date: April 22, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 calendar days of the date of this notice. Unless the Assistant Attorney General for the Office of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

(End of Notice)

You received this email because you are a current or previous Department of Justice grant applicant or award recipient. GovDelivery is providing this service on behalf of the Department of Justice and may not use your subscription information for any other purposes. For more information, review the Department of Justice Privacy Policy and the GovDelivery Privacy Policy.

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GOVDELIVERY

EXHIBIT 5

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	HEALTH RESOURCES IN ACTION, INC. 2 BOYLSTON STREET 4TH FLOOR
City, State and Zip:	BOSTON, MA 02116
Recipient UEI:	FPD3JRJ61WJ2

Project Title: Massachusetts Community Violence Intervention Capacity Building Initiative (MCVI-CBI)	**Award Number:** 15PBJA-23-GK-05187-CVIP

Solicitation Title: BJA FY 23 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative

Federal Award Amount: $4,000,000.00	**Federal Award Date:** 9/28/23

Awarding Agency:	Office of Justice Programs Bureau of Justice Assistance
Funding Instrument Type:	CA

Opportunity Category: D
Assistance Listing:
16.045 - Community-Based Violence Intervention and Prevention Initiative

Project Period Start Date: 10/1/23	**Project Period End Date:** 9/30/26
Budget Period Start Date: 10/1/23	**Budget Period End Date**: 9/30/26

Project Description:

Based in Boston, Health Resources in Action (HRiA) is a national public health organization with more than 65 years of prevention, health promotion, policy, and research experience and extensive technical and practical expertise in CVI strategies. HRiA will develop and implement the Massachusetts Community Violence Intervention Capacity Building Initiative (MCVI-CBI). Aligning with the goals of the BJA, the MCVI-CBI fulfills the requirements of Category 4, Capacity Building for CBOs via Intermediary Organizations. To achieve BJA's and HRiA's shared goal of preventing and reducing violent crime in communities, the MCVI-CBI has four primary objectives: Award and administer five subawards to Massachusetts -based CBOs implementing CVI strategies, provide TTA to support CVI strategy implementation among selected grantees, build the capacity of funded CBOs to strengthen and financially sustain CVI strategies, and establish and maintain an online resource to allow funded CBOs and other interested partners to search and access knowledge products to support the diffusion of innovation and the replication of evidence-based CVI practices. HRiA's scope of work is divided into two capacity-building action steps. Action Step 1, Formative Evaluation and Subaward Administration, includes the following activities: Conduct gap assessment, develop request for proposals process, and conduct CBO selection process. Action Step 2, Provision of CVI Strategy Support Services, includes the following activities: create a project management and communication plan, complete grantee capacity needs assessments, develop a TTA/capacity building program, and measure the impact of TA/capacity building. Aligning with national best practices, HRiA prioritizes CVI solutions that bolster participant motivation and understanding of how systems change must engage those community members most disenfranchised from systems-level decision-making and, therefore, impacted by community violence. HRiA has a national reputation for excellence and extensive experience providing oversight of request for proposal (RFP) processes, applicant outreach, and technical assistance, convening and facilitating review panels, processing grant awards, administering grant funds, and overseeing and reviewing post-award reporting.

Award Letter

September 28, 2023

Dear Amber Ross,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by HEALTH RESOURCES IN ACTION, INC. for an award under the funding opportunity entitled 2023 BJA FY 23 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative. The approved award amount is $4,000,000.
Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Amy Solomon
Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see https://ojp.gov/funding/Explore/LegalOverview/CivilRightsRequirements.htm.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria.

These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOPs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEOP requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type

OJP - Categorical Exclusion

NEPA Letter

OJP’s Community Based Violence Intervention and Prevention Initiative (CVIPI) seeks to prevent and reduce violent crime in communities by supporting comprehensive, evidence-based violence intervention and prevention programs, including efforts to address gang and gun violence, based on partnerships among community residents, local government agencies, victim service providers, community-based organizations (CBOs), law enforcement, hospitals, researchers, and other community stakeholders.

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third-party action:

(1) New construction.

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species.

(3) A renovation that will change the basic prior use of a facility or significantly change its size.

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment.

(5) Implementation of a program involving the use of chemicals.

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

NEPA Coordinator

First Name	Middle Name	Last Name
Orbin		Terry

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
HEALTH RESOURCES IN ACTION, INC.

UEI
FPD3JRJ61WJ2

Street 1
2 BOYLSTON STREET 4TH FLOOR

Street 2

City
BOSTON

State/U.S. Territory
Massachusetts

Zip/Postal Code
02116

Country
United States

County/Parish

Province

Award Details

Federal Award Date
9/28/23

Award Type
Initial

Award Number
15PBJA-23-GK-05187-CVIP

Supplement Number
00

Federal Award Amount
$4,000,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.045	Community-Based Violence Intervention and Prevention Initiative

Statutory Authority

Department of Justice Appropriations Act, 2023 (Pub. L. No. 117-328; 136 Stat. 4459, 4537); Bipartisan Safer Communities Supplemental Appropriations Act, 2022 (Pub. L. No. 117-159, 136 Stat. 1313, 1339); 28 U.S.C. 530C

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title

2023 BJA FY 23 Office of Justice Programs Community Based Violence Intervention and Prevention Initiative

Awarding Agency

OJP

Program Office

BJA

Application Number

GRANT13871434

Grant Manager Name

Linda Hill-Franklin

Phone Number

202-514-0712

E-mail Address

Linda.Hill-Franklin@usdoj.gov

Project Title

Massachusetts Community Violence Intervention Capacity Building Initiative (MCVI-CBI)

Performance Period Start Date

10/01/2023

Performance Period End Date

09/30/2026

Budget Period Start Date

10/01/2023

Budget Period End Date

09/30/2026

Project Description

Based in Boston, Health Resources in Action (HRiA) is a national public health organization with more than 65 years of prevention, health promotion, policy, and research experience and extensive technical and practical expertise in CVI strategies. HRiA will develop and implement the Massachusetts Community Violence Intervention Capacity Building Initiative (MCVI-CBI). Aligning with the goals of the BJA, the MCVI-CBI fulfills the requirements of Category 4, Capacity Building for CBOs via Intermediary Organizations. To achieve BJA's and HRiA's shared goal of preventing and reducing violent crime in communities, the MCVI-CBI has four primary objectives: Award and administer five subawards to Massachusetts -based CBOs implementing CVI strategies, provide TTA to support CVI strategy implementation among selected grantees, build the capacity of funded CBOs to strengthen and financially sustain CVI strategies, and establish and maintain an online resource to allow funded CBOs and other interested partners to search and access knowledge products to support the diffusion of innovation and the replication of evidence-based CVI practices. HRiA's scope of work is divided into two capacity-building action steps. Action Step 1, Formative Evaluation and Subaward Administration, includes the following activities: Conduct gap assessment, develop request

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[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

1

Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety,” OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient (“subgrantee”) at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the “controlled equipment” list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition: Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

2

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

3

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a

gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

4

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2022 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2022 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2022 award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

5

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

6

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

7

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

8

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2022)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2022, are set out at https://www.ojp.gov/funding/Explore/FY22AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

9

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

Currently, among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38, currently, also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at https://www.ecfr.gov/cgi-bin/ECFR?page=browse), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

10

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

11

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

12

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

13

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

14

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

15

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

16

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal

statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

17

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

18

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

19

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

20

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

21

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

22

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high

risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

23

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

24

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

25

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

26

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

27

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

28

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

29

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

30

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

31

The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

32

The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJA's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).

33

The recipient agrees that no funds under this grant award (including via subcontract or subaward, at any tier) may be used for unmanned aircraft systems (UAS), which includes unmanned aircraft vehicles (UAV), or for any accompanying accessories to support UAS.

34

Verification and updating of recipient contact information

The recipient must verify its Grant Award Administrator, Financial Manager, and Authorized Representative contact information in JustGrants, including telephone number and e-mail address. If any information is incorrect or has changed, the award recipient’s Entity Administrator must make changes to contact information through DIAMD. Instructions on how to update contact information in JustGrants can be found at https://justicegrants.usdoj.gov/training/training-entity-management.

35

The recipient agrees to submit to BJA for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award at least thirty (30) working days prior to the targeted dissemination date. The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities. Any products developed under this award, (with the exception of press releases, web sites, and mobile applications), shall contain the following statements: “This project was supported by Grant No. <Award_Number> awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." (Note: A separate disclaimer has been developed and is required for web sites and mobile applications. No disclaimer is required for press releases.)

36

Any Web site that is funded in whole or in part under this award must include the following statement on the home

page, on all major entry pages (i.e., pages (exclusive of documents) whose primary purpose is to navigate the user to interior content), and on any pages from which a visitor may access or use a Web-based service, including any pages that provide results or outputs from the service: "This Web site is funded in whole or in part through a grant from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)." The full text of the foregoing statement must be clearly visible on the home page. On other pages, the statement may be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

37

Applicants must ensure that Limited English Proficiency persons have meaningful access to the services under this program(s). National origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI and the Safe Streets Act, recipients are required to take reasonable steps to ensure that LEP persons have meaningful access to their programs. Meaningful access may entail providing language assistance services, including oral and written translation when necessary. The U.S. Department of Justice has issued guidance for grantees to help them comply with Title VI requirements. The guidance document can be accessed on the Internet at www.lep.gov.

38

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

39

Confidentiality of data

The recipient (and any subrecipient at any tier) must comply with all confidentiality requirements of 34 U.S.C. 10231 and 28 C.F.R. Part 22 that are applicable to collection, use, and revelation of data or information. The recipient further agrees, as a condition of award approval, to submit a Privacy Certificate that is in accord with requirements of 28 C.F.R. Part 22 and, in particular, 28 C.F.R. 22.23.

40

The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.

41

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

42

Protection of human research subjects

The recipient (and any subrecipient at any tier) must comply with the requirements of 28 C.F.R. Part 46 and all OJP policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.

43

Required attendance at BJA-sponsored events

The recipient (and its subrecipients at any tier) must participate in BJA-sponsored training events, technical assistance events, or conferences held by BJA or its designees, upon BJA's request.

44

Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

45

Recipient understands and agrees to report on the use and status of real property acquired, constructed, or improved under this award, throughout the useful life of the property or until the federal interest in the property ceases, whichever is shorter. Recipient further agrees to provide the required use and status reports on federal Standard Form 429 and accompanying addenda, as directed by OJP, in conformance with 2 C.F.R. 200.330. Recipient must submit its initial report not later than 90 days after completion of the project or of grant close-out, whichever is earlier, and submit status reports annually, as directed. Additional information about this requirement may be found online at https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/realpropertyfaq.pdf.

46

The recipient may not obligate, expend, or draw down any award funds for indirect costs, unless and until either -- (1) the recipient submits to OJP a current, federally-approved indirect cost rate agreement, or (2) the recipient determines that it is eligible under the Part 200 Uniform Requirements to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and advises OJP in writing of both its eligibility and its election.

The financial review of the budget for this award is pending. If the OJP Office of the Chief Financial Officer (OCFO) determines as part of its financial review that the recipient already has submitted the documentation concerning indirect costs described above, this condition will be released through a Grant Award Condition Modification (ACM) upon completion of the OCFO final budget review.

If the OJP OCFO instead determines as part of its financial review that the recipient has not yet submitted the required documentation concerning indirect costs, this condition will not be released until OJP (including its OCFO) receives and reviews a satisfactory submission.

47

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the BJA has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and BJA's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and BJA will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, BJA, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with BJA. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and BJA. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

48

The recipient agrees to track and report to BJA on its training and technical assistance activities and deliverables progress using the guidance and format provided by BJA.

49

Recipient understands and agrees not to engage in activities constituting organizational conflicts of interest, such as bidding on specifications it guided as part of the provision of training and technical assistance under this award. Actions that may give rise to organizational conflicts of interest under awards are described in the Procurement Standards in 2 C.F.R. Part 200 (the Part 200 Uniform Requirements) and the DOJ Grants Financial Guide. Prior approval from the grant manager is required for any work with an organization or entity that would receive training or technical assistance under this award.

50

Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

51

The recipient's budget (and budget narrative) is pending clearance by OJP.

Prior to budget clearance (and unless there is a more restrictive condition on this award, in which case the terms of that more restrictive condition apply): The recipient may not drawdown more than 10% of the award. Pre-clearance obligations, expenditures, and drawdowns may be disallowed if not in compliance with program requirements.

The recipient should be judicious in using award funds prior to budget clearance. Generally, OJP expects that recipients (depending on the specific project scope) may need to advertise for award-funded positions, pay personnel and fringe benefits for positions budgeted under the award, plan for project activities, attend training and pay training-related travel needed to begin the project, and engage in other limited activities conducted by recipient staff (i.e., generally not requiring a subaward or procurement contract under an award).

OJP will issue an Award Condition Modification upon budget clearance.

52

The Project Director and/or any other key program personnel designated in the application shall be replaced only for compelling reasons. Successors to key personnel must be approved by OJP, and such approval is contingent upon submission of appropriate information, including, but not limited to, a resume. Changes in program personnel, other than key personnel, require only notification to OJP and submission of resumes, unless otherwise designated in the award document.

53

Recipient may not obligate, expend, or drawdown funds until the Bureau of Justice Assistance, Office of Justice Programs has reviewed and approved the Budget Narrative portion of the application and has issued an Award Condition Modification (ACM) informing the recipient of the approval.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Assistant Attorney General	Amy Solomon	9/26/23 9:11 PM

Authorized Representative

Declaration and Certification

Entity Acceptance

Title of Authorized Entity Official
Contracts Administrator

Name of Authorized Entity Official
Amber Ross

Signed Date And Time
10/2/2023 8:42 PM

EXHIBIT 6

Subject: Notice of Award Termination

Office of Justice Programs <OJP_COMMS@public.govdelivery.com> Tue, Apr 22, 5:30 PM
to Amber Ross

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 22, 2025

Subject: Termination of Award

Based on a careful review, the award listed immediately below is hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number: 15PBJA-23-GK-05187-CVIP

As provided, respectively, in the award itself, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800, apply to this award. Specifically, the award document provides notice of the applicability of the termination provisions in § 200.340.

This award is being terminated because it "no longer effectuates the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. This award demonstrates that it no longer effectuates Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice, other than pursuant to closeout responsibilities.

Effective date: April 22, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 calendar days of the date of this notice. Unless the Assistant Attorney General for the Office of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

(End of Notice)

You received this email because you are a current or previous Department of Justice grant applicant or award recipient. GovDelivery is providing this service on behalf of the Department of Justice and may not use your subscription information for any other purposes. For more information, review the Department of Justice Privacy Policy and the GovDelivery Privacy Policy.

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GOVDELIVERY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,

Plaintiffs, on behalf of themselves and all others similarly situated,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

PAMELA J. BONDI, in her official capacity as United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official capacity as Acting Head of the Office of Justice Programs,

Defendants.

Case No. _____

DECLARATION OF NICHOLAS TURNER

I, Nicholas Turner, declare as follows:

1. My name is Nicholas Turner. I am a resident of Kings County in the state of New York. I am over the age of eighteen. This declaration is based upon my personal knowledge and the knowledge I have acquired in the course of my duties. If called as a witness, I could and would testify competently to the matters set forth below. I provide this declaration in support of the motion for preliminary injunction.

2. I am the President and Director of the Vera Institute of Justice. In this role, I am Vera's chief executive. I started in this role in August of 2013 and have served in the position for over eleven years. In my role as President and Director, I oversee all the programs funded by the terminated awards, and the initiatives affected by the terminations.

3. Prior to this position, I served as a Managing Director at the Rockefeller Foundation. I also previously served in other roles at Vera from 1998 to 2007, leading the expansion of Vera's national programs and rising to the position of Vice President, Chief Program Officer. I also previously practiced law at Paul, Weiss, Rifkind, Wharton & Garrison and clerked for the late Honorable Jack B. Weinstein of the Eastern District of New York.

Vera's Mission and Impacted Programs

4. Vera Institute of Justice, founded in 1961, is the oldest and one of the largest organizations in the country working to advance safety and justice. For over sixty years, Vera has worked in partnership with community and government leaders—including in law enforcement and corrections—to address some of the most intractable problems in the criminal justice system. Our mission is to pilot, test, and scale innovations that prevent crime and address its drivers, increase accountability, and rely less on incarceration and more on the programs and services that help individuals, families, and communities to thrive.

5. As part of this work, Vera oversees three initiatives directly impacted by the terminations: Redefining Public Safety, Restoring Promise, and Reshaping Prosecution. Vera also remains responsible for two additional programs affected by terminated awards. Vera initially commenced these programs, and they are being completed by our spinoff organization, Activating Change. Vera is a member of Activating Change, and I sit on Activating Change's board of directors.

6. Vera has been an active participant in the development of this lawsuit and has remained in regular communication with Plaintiffs' counsel about this case. Vera is willing and able to take an active role in this litigation and to protect the interests of all members of the Class.

Vera's Grant Process, in general

7. Vera's budget reflects a mix of philanthropic, individual, and government grant and cooperative agreement funding. Vera regularly responds to Requests for Proposals (RFPs) issued by

the Department of Justice (DOJ) Office of Justice Programs (OJP), including its subsidiary agencies, the Bureau of Justice Assistance (BJA), National Institute of Justice (NIJ), Office of Juvenile Justice Delinquency and Prevention (OJJDP), and Office for Victims of Crime (OVC), as well as DOJ agencies Office of Community Oriented Policing Services (COPS) and the Office on Violence against Women (OVW). As part of an application for a grant or a cooperative agreement, Vera proposes a scope of work addressing the RFP's programmatic goals, along with a cost-recovery budget and supporting documentation that demonstrates organizational preparedness to perform the work (e.g., resumes of key personnel for a project; letters of support from potential collaborators, subrecipients, or others whose cooperation will be necessary or helpful in performing the proposed work; required organizational policies; etc.). Applications are generally due in the spring, and awards are typically announced in September, as the federal fiscal year draws to a close. Over our history, Vera has been awarded and successfully fulfilled cooperative agreements or grants with each of these DOJ agencies, in both Democratic and Republican administrations.

Termination of Cooperative Agreement Funding Without Notice

8. On April 4, 2025, at 3:12 p.m., Vera received an email from the Office of Justice Programs purporting to immediately terminate five of Vera's cooperative agreements: 15POVC-21-GK-01096-NONF (Vera Award 1), attached as Exhibit 1; 15PBJA-24-GK-02981-JAGP (Vera Award 2), attached as Exhibit 2; 15PBJA-23-GK-05353-MUMU (Vera Award 3), attached as Exhibit 3; and 15PBJA-23-GK-05375-SCAX (Vera Award 4), attached as Exhibit 4; 15POVC-21-GK-03261-HT (Vera Award 5), attached as Exhibit 5.

9. The termination email stated that the awards were being terminated because they "no longer effectuate agency priorities." The termination email went on to state that "the Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting

American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. These awards demonstrate that they no longer effectuate Department priorities." No other basis or explanation for the termination was provided. The termination email did not claim Vera failed to comply with the terms or conditions of the awards and did not otherwise explain why the awards no longer effectuated Department priorities. These awards total $7.25 million dollars, with approximately $5.4 million dollars of funding outstanding. A true and correct copy of the termination email is attached as Exhibit 6.

10. The termination email advised that Vera could "appeal this termination in writing within 30 business days."

11. The termination email also required Vera to commence "closeout and other obligations in 2 C.F.R. § 200.340(d)," including an obligation that Vera "promptly refund any unobligated funds," that have been paid out, and retain award records for at least three years. The letter threatened that failure to meet these closeout obligations could include "appropriate enforcement actions," and "affect eligibility for future grants."

12. The closeout obligations include preparing and submitting the required reports; terminating agreements with vendors, consultants, and partners; and submitting Vera's remaining reimbursement requests for project and closeout expenses.

13. Vera was locked out of the federal grants payment system a few days before receiving the termination notice. As a result, Vera has incurred approximately $381,476 of expenses in performing the awards that have not yet been reimbursed.

14. It was Vera's understanding that the funds awarded through these cooperative agreements would be available throughout the agreement periods and that DOJ could terminate the agreements only if Vera failed to comply with the terms and conditions of the awards. It was not

Vera's understanding that DOJ could terminate these awards based on that agency's assertion that the awards no longer effectuate agency priorities.

Termination of Awards Creates Real Harm

15. The termination of Vera's awards created an immediate harm and impact to not only Vera's ability to maintain business and programmatic operations prescribed by the awards but also denied funds to be paid to partners and contractors, impacting their ability to have the financial resources to sustain their organizational work. As a result of the termination of Vera's awards:

a. hard-of-hearing and Deaf victims of crimes cannot use interpretive services provided by Vera's National Sign Language Interpreter Bank for Victim Services to communicate with law enforcement and victim services;

b. the cities of Richmond, California and Albuquerque, New Mexico, have lost subaward funding that would have supported modernizing each city's 911 call systems and training civilian specialists to respond to mental and behavioral health crises;

c. prosecutors in Arizona, Colorado, Massachusetts, North Carolina, and Virginia will have greater difficulty in launching or expanding diversion programs, designed to help prosecutors address the underlying drivers of criminal conduct in their communities;

d. state departments of correction facilities have withdrawn from Vera's project to support data collection, policy development, training, and monitoring for correctional facilities to increase safety in prisons, and Vera was forced to dissolve a 15-person advisory board already assembled to support the program;

e. the needs of human trafficking survivors with disabilities will go unmet as at least 50 law enforcement officers and dozens of law enforcement agencies around the nation are deprived of training opportunities to help law enforcement develop resources; and

f. Vera staff members working full or part time on programs funded by Vera's awards are now severely limited in their ability to carry out the violence intervention, research, technical assistance, and program development work and face the real possibility of unemployment in the near future.

16. Vera relied and acted upon its expectation and understanding that DOJ would fulfill its commitment to provide award funding. Vera relied on this by recruiting partners from local government, corrections and law enforcement agencies to launch or expand programs across the country, including in Oklahoma, New Mexico, California, and Colorado; dedicating more than 10 staff members to work full or part-time on these programs; and incurring costs related to program assistance, training, travel, research, and data analysis.

17. DOJ's termination of these awards with no notice will force Vera to make cuts in its budget to offset the loss of funding, including by cutting the budgets of programs tasked with carrying out the awards, cutting subawards that assist Vera in carrying out its mission, cutting funding for other programs, and making cuts to staff.

18. DOJ's termination of these awards has created immense uncertainty for Vera and has required Vera employees, as well as partners in government and at other organizations, to spend significant amounts of time working on responding to that chaos. I, along with many other leaders within Vera, have spent an enormous number of hours over the last few weeks attempting to quantify and mitigate the effects of these award terminations—time that could have been spent advancing our mission to make communities safer and to deliver more justice to people impacted by the criminal justice system—both victims and defendants.

Award 1: Sign Language Services for Deaf Victims of Crime

19. On September 21, 2021, Defendants awarded Vera $1 million in funding, beginning October 1, 2021 and ending June 30, 2025 for the Advancing the Use of Technology to Assist Victims

of Crime: National Sign Language Interpreter Bank for Victim Services cooperative agreement to Vera. The award provides $1 million in funding from October 1, 2021, to June 30, 2025. *See* Exhibit 1.

20. This award was intended to assist crime victims who are hard of hearing or Deaf and specifically awarded Vera $1 million to provide free sign language interpretation services to Deaf crime victims. These services were offered entirely remotely, by specially trained victim services providers, to facilitate effective communication between Deaf victims of crimes and law enforcement. These interpretation services included specially trained, trauma-informed interpreters, allowing victim services providers to interact directly and effectively with Deaf survivors in their community and to provide Deaf survivors with both short and long-term assistance.

21. This award was terminated with less than three months and $161,003 of undisbursed funds remaining.

22. Prior to termination, this program (which used technology developed with the award funding) had connected with 4,209 victim services providers and others. But the program was halted in its tracks: after this award was terminated, Vera was forced to turn away Deaf victims of crime who were seeking interpretive services to help them communicate with law enforcement and victims' services. And Vera has no ability to further support the 872 victim services participants who completed language access training, and 119 people who received one-on-one technical assistance on how to provide language access in their organizations for Deaf victims of crime.

23. Additionally, this award funded a dedicated staff to fulfill the program's mission. DOJ's termination of the agreement three months early and with no notice made the wind down chaotic, painful, and potentially costly. Because the award was due to end on June 30, a conscientious wind-down, including severance for staff whose positions would be eliminated, was being planned. But instead of being able to provide a comprehensive accounting within the

agreement period, management is now burdened with a more complicated, post-hoc wind-down, increasing the difficulty of adhering to the allowability and allocability cost principles set forth in 2 C.F.R. Part 200.

Award 2: Supporting Local Government to Build a Comprehensive Public Safety Ecosystem

24. On October 1, 2024, Defendants awarded the BJA FY24 Reimagining Justice: Testing a New Model of Community Safety: Municipal Safety Hubs cooperative agreement to Vera. The award provides $2 million in funding from October 1, 2024, to September 30, 2027. *See* Exhibit 2.

25. This award supported local government partners to build the infrastructure needed for a more comprehensive approach to public safety to prevent crime, respond to crisis, and stop violence. Specifically, the agreement awarded Vera $2 million to provide technical assistance to public safety agencies in the Community Service Departments in Albuquerque, New Mexico, and Richmond, California through subawards. The pass-through amounts contemplated across fiscal years totaled $700,000: $62,500 by end of Vera's 2025 fiscal year (June 30, 2025), $313,000 in our FY26, $225,000 in our FY27, and $100,000 in our FY27. Through subawards, Vera facilitated these cities' efforts to create and sustain an innovative and scalable approach for advancing community safety without solely or overly relying on traditional law enforcement responses.

26. In communities across the country, police have long been the only first responders available to provide timely responses to behavioral health–related 911 calls. Research shows that approximately one out of five calls to 911 are for a mental health or substance use-related crisis that can be more effectively handled by a civilian trained responder. In Albuquerque and Richmond, Vera partnered with government leaders from several departments across each city to conduct the research, budget the resources, and launch or expand programs that deploy trained civilian specialists to respond to mental health and other behavioral health crises, and to prevent and intervene in violent crime, especially gun-related homicides and shootings. These are situations in which a civilian-based

approach takes the burden off traditional law enforcement to be the only response to a crisis and, importantly, provides local governments with a comprehensive range of options to address disorder, crime, and violence in cases where police are unable, unwilling, or lack the training to intercede.

27. The award termination resulted in Vera abruptly stopping the subaward process with Richmond and Albuquerque. The sudden halt in funding harmed Vera and the cities who were relying on the award. Each city had already dedicated significant staff time toward execution and expected the subaward to cover the costs of the new or expanded programs and the technology required to update their 911 and data collection systems for this more comprehensive approach. Specifically, each city was planning to use the subaward to analyze their 911 data to identify which cases could benefit from a civilian response and where law enforcement resources could be better managed or deployed. Each city planned to modernize their 911 call systems to allow, for example, a trained mental health expert or other specialized response, to be selected in appropriate and necessary circumstances. As a result of the termination, these two cities must find another way to fund these initiatives, or they will not be able to build out this necessary infrastructure to address pressing problems of disorder, crime, and violence—all of which undermine community safety.

28. The award termination also impacted funding for nine program, policy, and research staff dedicated to the project. To fill the gap due to the loss of funding, Vera has had to draw down funding from other sources, limit the staff capacity on this important project, and greatly curb the amount of assistance, especially in-person, that can be provided to the partner agencies and leaders in both Richmond and Albuquerque. Without the opportunity to meaningfully build relationships with key government staff tasked with building or expanding these interventions, the overall success of this program is likely to be negatively impacted.

29. Another loss as a result of the award termination is the opportunity for peer learning among the public safety leaders in Richmond and Albuquerque. Peer learning is an integral tool for

government officials to spur innovation, troubleshoot challenges, and workshop with others who are similarly situated. Losing that aspect of this program is an intangible but significant loss for the local government leaders who benefit from peer support, encouragement, and knowledge exchange.

30. This award was terminated with 30 months remaining and $1,977,389 of undisbursed funds remaining.

Award 3: Advancing Safety through Prosecutor-Led Diversion

31. On October 1, 2023, Defendants awarded the BJA FY 23 Field Initiated: Encouraging Innovation cooperative agreement to Vera for the project Motion for Justice: Partnering with Prosecutors and Impacted Communities to Remove Barriers and Expand Access to Community-Led Diversion Programming. The award provides $1 million in funding from October 1, 2023, to September 30, 2026. *See* Exhibit 3.

32. This award was designed to assist prosecutors in their efforts to ensure the safety of the American public by using all the tools within their discretion, including community-based programming, to reduce crime and prevent recidivism. These programs are conventionally known as "diversion." Specifically, the award granted Vera $1 million to assist prosecutors and community-based organizations in six jurisdictions in Arizona, Colorado, Massachusetts, North Carolina, and Virginia to develop effective policies, practices, and programs to safely expand diversion programs in their jurisdictions. The award was designed to reduce recidivism and advance public safety, as well as build trust in the legal system among local community members by demonstrating that community-based programs are a legitimate and viable alternative to incarceration in some cases.

33. Vera planned to build a cohort that supported the six jurisdictions in launching and expanding diversion programs. Through the six-jurisdiction cohort, the intention was to create a blueprint for building and expanding community-based diversion programs and, importantly, addressing the racial disparities that result in more severe outcomes for Black and brown individuals

charged with an offense compared to their white counterparts. These disparities are not only unjust but also undermine trust in law enforcement and the legal system. By launching and expanding community-based diversion, local prosecutor's offices could direct attention away from low-level and relatively minor offenses and deploy those limited resources toward the most serious and violent cases. This program would have also conducted much-needed research for the criminal justice and public safety field into whether community-based diversion is in fact successful in reducing recidivism and promoting community safety. Ultimately, Vera intended to disseminate these research findings to help officials across the country build more effective diversion programs.

34. Because of the termination and the reduction in assistance it compels, dozens of individuals in six jurisdictions will not benefit from local, community-based services that would address the underlying drivers of criminal conduct, like substance abuse, a lack of employment and housing, and unmet mental health needs. Due to the loss of funding, employees staffed on this award have been forced to reduce the level of assistance to the cohort of six jurisdictions, including less travel to sites and abandoning plans to bring the cohort together for ongoing training, peer learning, and ideas exchange. The reduction in site visits has an especially negative impact, as being on-site allowed us to convene local stakeholders for critical conversations, review data analysis and policies, observe success and challenges with setting up or expanding the diversion programs, and otherwise troubleshooting and overcoming any obstacles that arise.

35. Additionally, the award termination will negatively impact the local community-based organizations in each of the six jurisdictions. Vera had intended to use other funding to provide grants to each community-based organization to support planning and staff time for launching or expanding the diversion program. The termination of this OJP award has instead required Vera to repurpose money from other sources for this work and, to compensate, reduce the subaward amount to the community-based organizations partnering with us in the six jurisdictions.

36. This award was terminated with eighteen months remaining and $677,948 of funds remaining.

Award 4: Making Prisons Safer for Staff and Incarcerated People

37. On October 1, 2023, Defendants awarded the BJA FY 23 Transforming Prison Cultures, Climates, and Spaces: Designed for Dignity cooperative agreement to Vera. The award provides $1.5 million in funding from October 1, 2023 to September 30, 2026, followed on October 1, 2024 by a supplemental award of an additional $1.25 million in funding from October 1, 2024 to September 30, 2027 (for a total of $2.75 million). *See* Exhibit 4.

38. This award was designed to improve safety in prisons for both correctional staff and people incarcerated. Specifically, Vera was granted $1.5 million to help three state departments of corrections make units within their prison system safer by implementing new restorative justice policies with respect to prison operations and culture, implementing trainings on restorative practices for staff, making physical improvements to the built environment and unit design, and winning buy-in for a new approach to prison safety from correctional leadership to line staff. BJA's enthusiasm for the potential impact of this program was so evident that OJP approved a supplemental award with an additional $1.25 million (for a total of $2.75 million), well before the first award was fully performed or spent down.

39. Three partner departments of corrections were carefully vetted and selected in early 2025 and plans were already underway with each agency to dedicate correctional staff to the project, schedule trainings and times for site visits, gather data and other needed information to assist Vera in launching the project, and socialize the partnership across both correctional leadership and line corrections staff. The three departments of corrections had, based on reliance that the project was moving forward, dedicated hours of leadership and staff time to preparing for the partnership. This program was built on the results of a DOJ National Institute of Justice-funded randomized-control

study that found that implementing restorative practices reduces violence in prisons, improves the morale and well-being of corrections staff, and incentivizes better behavior and engagement from incarcerated people.

40. Under this award, twelve Vera staff members were tasked with providing training and technical assistance to support three state departments of corrections with data collection; policy development; and to facilitate training and monitoring for correctional facilities to increase safety in prisons. These staff would also provide implementation monitoring and sustainability planning to ensure that changes in policies and practices will last beyond the time of the engagement, thus extending the effect of the federal grant money.

41. Eight days prior to the award termination, one department of corrections heralded the partnership and shared a video with its staff announcing the work and explaining how Vera would partner with corrections staff and incarcerated people.

42. As a result of termination of this award, two of the three state departments of corrections withdrew from the project and Vera was forced to dissolve the recently-assembled advisory board of 15 experts from across the corrections and criminal justice fields who could provide the project with the most current knowledge about prison conditions. The termination of funding and withdrawal of two departments of corrections from this program will make these prisons less safe for both staff and incarcerated people who will not benefit from the changes in operations, culture, training, and oversight in these facilities.

43. Additionally, after the award was terminated, a DOJ Bureau of Prisons employee reached out to Vera, expressing interest in working with Vera under the award, specifically because it supported the Bureau's role "as an agency dedicated to the progress and advancement of safe, healthy and secure environment[s]." The Bureau of Prisons is known to be an especially challenging correctional environment, facing overcrowding, longstanding problems with violence behind bars,

and staffing reductions. However, because this award was terminated Vera will not be able to pursue this work with the Bureau of Prisons and increase safety within the federal correctional environment.

44. This award was terminated with 30 months remaining and $2,458,945 of funds remaining.

Award 5: Assistance for Victims of Human Trafficking with Disabilities

45. On October 1, 2021, Defendants awarded the 2021 OVC FY 2021 Field-Generated Human Trafficking Training and Technical Assistance for Law Enforcement: Responding to Human Trafficking of People with Disabilities cooperative agreement to Vera. The award provides $500,000 in funding from October 1, 2021, to June 30, 2025. *See* Exhibit 5.

46. This award, titled "Training and Technical Assistance for Law Enforcement for Responding to Human Trafficking of People with Disabilities," helps police agencies across the country more effectively identify victims of sex and labor trafficking and provide the necessary services to address the unique needs of this population. Specifically, research in the field suggests that people with disabilities are victims of sex and labor trafficking at disproportionately higher rates than others, but law enforcement often lacks the training necessary to identify these victims, build trust with them, and investigate their cases. This award provided $500,000 in funding to Vera and the International Organization of Adolescents to design a comprehensive online training program to better educate and equip law enforcement to handle the unique challenges facing human trafficking victims with disabilities.

47. DOJ terminated this award with less than three months and more than $167,274 of undisbursed funds remaining.

48. The termination deprives dozens of law enforcement agencies around the country of the training and skills to better serve human trafficking survivors with disabilities. Before the award termination, Vera had been regularly training law enforcement officers and helping agencies to develop

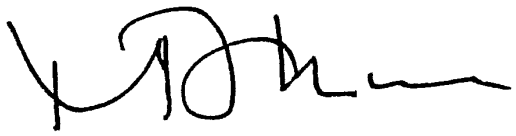
resources, such as counseling, language access, referrals, and policy directives, to meet the needs of this vulnerable population. For example: an event that is now canceled because of the award termination was a scheduled, national webinar on how to effectively respond to and investigate human trafficking cases involving survivors with disabilities. Approximately 486 people registered for the webinar, half of whom were law enforcement. Additionally, Vera had plans to host two more learning cohorts of up to 25 law enforcement officers in the final months of the agreement period. The additional cohorts were intended to help sustain impact of Vera's work beyond the end of the funding period by building a network of trained law enforcement officers who could in turn train and assist other law enforcement personnel investigating cases of human trafficking involving disabilities. The loss of funding resulted in the abrupt termination of those cohorts and ultimately a loss of resources to law enforcement and their ability to serve as a force multiplier for other officers in the future.

49. In the final months of the award, Vera planned to complete an online training series targeted to better educate and equip law enforcement to handle the unique challenges facing human trafficking victims with disabilities. As a result of the termination, Vera halted all work on the training series. Now the law enforcement audience will no longer benefit from the final four courses of the training as well as the aforementioned webinar.

50. Not only will these abruptly canceled online trainings and webinars prevent law enforcement from benefiting from the information and insights provided, but it wastes the federal dollars invested in the development of the trainings to date if the officers do not complete the full series.

Signature on following page.

Date: May 21, 2025



Nicholas Turner
President and Director of Vera Institute of Justice
Kings County, New York

EXHIBIT 1

Award Letter

September 21, 2021

Dear Adair Iacono,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by VERA INSTITUTE OF JUSTICE, INC. for an award under the funding opportunity entitled 2021 OVC FY 2021 Advancing the Use of Technology to Assist Victims of Crime. The approved award amount is $1,000,000.

Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

Congratulations, and we look forward to working with you.

Amy Solomon
Acting Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice

(DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see https://ojp.gov/funding/Explore/LegalOverview/CivilRightsRequirements.htm.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria. These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOPs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEOP requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type

OJP - Categorical Exclusion

NEPA Letter

The Vera Institute of Justice (Vera) will increase access to victim services to Deaf victims by providing free sign language interpretation services through virtual technology. Through this project, Vera will address this critical and enduring gap in access to victim services for Deaf victims of crime through the use of technology. Interpretation services will be provided remotely using safe and secure technology by specially-trained, trauma-informed interpreters, allowing victim service providers to interact directly and effectively with Deaf survivors in their community and to provide Deaf survivors with both short and long-term assistance.

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third party action:

(1) New construction

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species

(3) A renovation that will change the basic prior use of a facility or significantly change its size

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment

(5) Implementation of a program involving the use of chemicals (including the

identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager Environmental NEPA Coordinator

First Name	Middle Name	Last Name
Zoe	— —	French

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name

DUNS Number
073299836

Street 1
34 35TH ST STE 4-2A

Street 2
——

City
BROOKLYN

State/U.S. Territory
New York

Zip/Postal Code
11232

Country
United States

County/Parish
——

Province
——

Award Details

Federal Award Date
9/21/21

Award Type
Initial

Award Number
15POVC-21-GK-01096-NONF

Supplement Number
00

Federal Award Amount
$1,000,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.582	Crime Victim Assistance/Discretionary Grants

Statutory Authority

34 U.S.C. § 20103(c)(1)(A)

I have read and understand the information presented in this section of the Federal Award Instrument.

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title
2021 OVC FY 2021 Advancing the Use of Technology to Assist Victims of Crime

Application Number
GRANT13373667

Awarding Agency
OJP

Program Office
OVC

Grant Manager Name **Phone Number**
202-307-0932
— —

E-mail Address
Ivette.Estrada@usdoj.gov

Project Title
National Sign Language Interpreter Bank for Victim Services

Performance Period Start Date	Performance Period End Date
10/01/2021	09/30/2024

Budget Period Start Date	Budget Period End Date
10/01/2021	09/30/2024

Project Description
The Problem: While research has shown that Deaf children and adults experience harm at rates higher than their hearing counterparts, due to a variety of cultural and communication barriers, they are less likely to receive services and other support that increases survivors' safety, healing and justice. One of the most significant and enduring barriers Deaf survivors face when

reaching out for help is a lack of qualified sign language interpretation. Highly qualified trauma-informed American Sign Language interpreters are critical for Deaf survivors to effectively access advocacy services, shelter-based services, support groups, and medical and legal services. Inexperienced or improperly assigned interpreters can cause significant barriers and harm. Yet, there is a dearth of qualified sign language interpreters in victim services for a number of reasons. In some areas of the country, there simply aren't any sign language interpreters available, or if there are, interpreters aren't qualified. Some victim service providers simply don't have the resources to pay for interpreters, or, if they do, they do not know how to find and secure qualified interpreters.

The Solution: The Vera Institute of Justice (Vera) is requesting $1 million to increase access to victim services to Deaf victims by providing *free* sign language interpretation services through virtual technology. Through this project, Vera will address this critical and enduring gap in access to victim services for Deaf victims of crime through the use of technology. Interpretation services will be provided remotely using safe and secure technology by specially-trained, trauma-informed interpreters, allowing victim service providers to interact directly and effectively with Deaf survivors in their community and to provide Deaf survivors with both short and long-term assistance. Vera will provide remote interpretation services Monday through Friday, from 9 a.m. to 11 p.m. Eastern time (6 a.m. to 8 p.m. Pacific time) and weekends, as requested. Non-profit victim service providers in the United States will be eligible to receive sign language interpretation services through this project. The project will prioritize organizations in rural and remote communities; those in communities with no sign language interpreters or interpreters qualified to work in victim services; and those who lack financial resources to pay for interpretation. In addition to providing qualified, trauma-informed virtual interpreting services, Vera will work to increase the capacity of victim service providers to effectively secure and work with sign language interpreters.

This project addresses three United States Department of Justice priority areas: 1.) the promotion of civil rights; 2.) access to justice, and 3.) support to crime victims.

☐ *I have read and understand the information presented in this section of the Federal Award Instrument.*

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

☐

I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

1

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2021 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2021 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2021 award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.333.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

2

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

3

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after January 1, 2019, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after January 1, 2019, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://www.ojp.gov/training/fmts.htm. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

4

Safe policing and law enforcement subrecipients

If this award is a discretionary award, the recipient agrees that it will not make any subawards to State, local, college, or university law enforcement agencies unless such agencies have been certified by an approved independent credentialing body or have started the certification process. To become certified, law enforcement agencies must meet two mandatory conditions: (1) the agency's use of force policies adhere to all applicable federal, state, and local laws; and (2) the agency's use of force policies prohibit chokeholds except in situations where use of

deadly force is allowed by law. For detailed information on this certification requirement, see https://cops.usdoj.gov/SafePolicingEO.

5

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

6

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

7

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

Currently, among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38, currently, also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at https://www.ecfr.gov/cgi-bin/ECFR?page=browse), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

8

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

9

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

10

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

11

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

12

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

13

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

14

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

15

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

16

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

17

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

18

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2021)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2021, are set out at https://ojp.gov/funding/Explore/FY21AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a

subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

19

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

20

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

21

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

22

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

23

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://ojp.gov/funding/Implement/TrainingPrinciplesForGrantees-Subgrantees.htm.

24

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

25

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

26

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

27

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

28

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

29

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient

promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

30

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

31

The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

32

The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

33

The recipient agrees to submit a final report at the end of this award documenting all relevant project activities during the entire period of support under this award. This report will include detailed information about the project(s) funded, including, but not limited to, information about how the funds were actually used for each purpose area, data to support statements of progress, and data concerning individual results and outcomes of funded projects reflecting project successes and impacts. The final report is due no later than 120 days following the close of this award period or the expiration of any extension periods. This report will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov/

34

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

35

Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

36

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

37

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the OVC has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and OVC's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and OVC will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, OVC, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with OVC. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and OVC. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.



Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

39

Justification of consultant rate

Approval of this award does not indicate approval of any consultant rate in excess of $650 per day. A detailed justification must be submitted to and approved by the OJP program office prior to obligation or expenditure of such funds.

40

The recipient agrees to submit to OJP for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award, 60 days before its intended publication. The recipient agrees to correct a product in response to comments generated through the OJP peer review process, the internal Department of Justice review process, or as otherwise requested by OJP. Any products developed under this award shall contain the following statement: "This _____ was produced by _____ under [add grant number], awarded by the [add Awarding Program Office, e.g., Office for Victims of Crime], Office of Justice Programs, U.S. Department of Justice. The opinions, findings, and conclusions or recommendations expressed in this _____ are those of the contributors and do not necessarily represent the official position or policies of the U.S. Department of Justice." The OJP grant manager will determine whether minor deliverables, such as webinars, one-page flyers and discrete web pages, require review or prior approval by OJP.

41

The recipient (and any "subrecipient" at any tier) must have written policies and procedures in place that address how it will maintain the confidentiality of victims' names, addresses, telephone numbers, or any other identifying information, including how this information will be protected when there is information sharing between partners. In addition, the recipient must submit a signed, written certification that data privacy and sharing protocols comport with the confidentiality and privacy rights and obligations of federal law or the grantee jurisdiction's laws, court rules, or rules of professional conduct applicable to the work performed by the

recipient. The recipient agrees to provide to OJP all documentation as required for grant monitoring purposes.

42

Applicants must certify that Limited English Proficiency persons have meaningful access to the services under this program(s). National origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI and the Safe Streets Act, recipients are required to take reasonable steps to ensure that LEP persons have meaningful access to their programs. Meaningful access may entail providing language assistance services, including oral and written translation when necessary. The U.S. Department of Justice has issued guidance for grantees to help them comply with Title VI requirements. The guidance document can be accessed on the Internet at www.lep.gov.

43

Copyright; Data rights

The recipient acknowledges that OJP reserves a royalty-free, non-exclusive, and irrevocable license to reproduce, publish, or otherwise use, and authorize others to use (in whole or in part, including in connection with derivative works), for Federal purposes: (1) any work subject to copyright developed under an award or subaward (at any tier); and (2) any rights of copyright to which a recipient or subrecipient (at any tier) purchases ownership with Federal support.

The recipient acknowledges that OJP has the right to (1) obtain, reproduce, publish, or otherwise use the data first produced under any such award or subaward; and (2) authorize others to receive, reproduce, publish, or otherwise use such data for Federal purposes. "Data" includes data as defined in Federal Acquisition Regulation (FAR) provision 52.227-14 (Rights in Data - General).

It is the responsibility of the recipient (and of each subrecipient (at any tier), if applicable) to ensure that the provisions of this condition are included in any subaward (at any tier) under this award.

The recipient has the responsibility to obtain from subrecipients, contractors, and subcontractors (if any) all rights and data necessary to fulfill the recipient's obligations to the Government under this award. If a proposed subrecipient, contractor, or subcontractor refuses to accept terms affording the Government such rights, the recipient shall promptly bring such refusal to the attention of the OJP program manager for the award and not proceed with the agreement in question without further authorization from the OJP program office.

44

The recipient's budget is pending review and clearance by OJP. Prior to budget clearance, unless prohibited by another condition of this award, the recipient may obligate and expend funds for budgeted recipient personnel, fringe benefit, and related operational costs and OVC-mandated travel costs, only, up to $25,000 to participate in OJP-required trainings, advertise for new positions, maintain current staffing, plan activities with project staff, and provide victim services. All obligations and expenditures incurred prior to budget clearance are incurred at the sole risk of the recipient, and must be in compliance with applicable 2 C.F.R. part 200 cost principles and DOJ Financial Guide provisions. The recipient may not obligate or expend additional funds, or draw down funds, except pursuant to an approved Award Condition Modification, or until OCFO has approved the budget and budget narrative, and has issued an Award Condition Modification removing this award condition. If any other condition on this

award prohibits obligation, expenditure, or drawdown of funds to a greater extent than this condition, then that other condition controls.

45

The recipient agrees to coordinate, through its Office of Justice Programs program manager, with the OJP Office of the Chief Information Officer (OCIO) on any information technology related products, including web-based systems or mobile applications, that will be developed in whole or in part with OJP grant funding.

46

Any Web site or mobile application that is funded in whole or in part under this award must include the following statement where most practicable: "This Web site [or application] is funded [insert "in part," if applicable] through a grant from the [insert name of OJP component], Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site [or application] (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)."

The full text of the foregoing statement must be clearly visible. The statement may also be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

47

Interoperable and Portable Software and Data:
Any software, data, or other intangible property (as defined at 2 C.F.R. 200.59) designed, developed, acquired, or produced under this award (hereinafter "software")"(1) must be provided, upon request, to OJP in an electronic format that is not dependent upon the recipient's internal or external computing systems, cloud computing services, servers, or other technology architecture (hereinafter "technology architecture") while retaining equivalent functionality; and (2) may be ported, migrated, or otherwise transferred to OJP or another entity designated by OJP while retaining equivalent functionality. (For the purposes of this condition, a requirement to use proprietary application programming interfaces, -protocols, -services, -data formats, or other -aspects of the recipient's technology architecture is not equivalent functionality.) When designing, developing, acquiring, or producing such software, the recipient may not comingle the software with other software, including privately-funded software, such that OJP may not reasonably exercise its license rights, including under 2 C.F.R. 200.315.

This requirement shall not be construed as requiring an award recipient to provide, disclose or otherwise furnish confidential data, including Personally Identifiable Information, in violation of federal or state law.

The provisions of this condition are among those included in any subaward (at any tier).

48

Patents and Inventions.

The clauses at 37 C.F.R. section 401.14 (together, the "Patents Rights Clause") are incorporated by reference, with the following modifications.

(1) Where italicized, the terms "contract," "contractor," and "contracting officer" are replaced, respectively, by the terms "award," "award recipient," and "OJP program manager";

(2) Patent Rights Clause paragraph (f) is modified by adding the following at the end:

"(5) The award recipient agrees to provide a report prior to the close out of the award listing all subject inventions or stating that there were none.

(6) The award recipient agrees to provide, upon request, the filing date, patent application number and title; a copy of the patent application; and patent number and issue date for any subject invention in any country in which the award recipient has applied for a patent.";

(3) Patent Rights Clause paragraph (g) is modified to read as follows:

"(g) Subawards and Subcontracts

"The award recipient will include this Patent Rights Clause, suitably modified to identify the parties, in all subawards and subcontracts, regardless of tier, for experimental, developmental, or research work. The subaward recipient or subcontractor will retain all rights provided for the award recipient in this clause, and the award recipient will not, as a part of the consideration for awarding the subaward or subcontract, obtain rights in the subaward recipient's or subcontractor's subject inventions."; and

(4) Patent Rights Clause paragraph (l) is modified to read as follows:

"(l) Communications

"Communications on matters relating to this Patent Rights Clause should be directed to the General Counsel, Office of Justice Programs, United States Department of Justice.".

With respect to any subject invention in which the award recipient, or a subaward recipient or subcontractor, retains title, the Federal government shall have a nonexclusive, nontransferable, irrevocable, paid-up license to practice or have practiced for or on behalf of the United States the subject invention throughout the world.

49

The Victims of Crime Act (VOCA) of 1984 states that VOCA funds are available during the federal fiscal year in which the award was actually made, plus the following three fiscal years. At the end of this period, VOCA funds will be deobligated. (E.g., VOCA funds awarded in FY 2021, are available until the end of FY 2024). Extensions beyond the statutory period may be granted at the discretion of DOJ, and may be requested in accordance with OJP processes, but are not assured.

50

The Project Director and/or any other key program personnel designated in the application shall be replaced only for compelling reasons. Successors to key personnel must be approved by OJP, and such approval is contingent upon submission of appropriate information, including, but not limited to, a resume. Changes in program personnel, other than key personnel, require only notification to OJP and submission of resumes, unless otherwise designated in the award document.

Load More

☐ *I have read and understand the information presented in this section of the Federal Award Instrument.*

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Acting Assistant Attorney	Amy Solomon	9/15/21 4:39 PM

Authorized Representative

Entity Acceptance

Title of Authorized Entity Official

General Counsel and Secretary

Signed Date And Time

— —

EXHIBIT 2

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	VERA INSTITUTE OF JUSTICE, INC. 34 35TH ST STE 4-2A
City, State and Zip:	BROOKLYN, NY 11232
Recipient UEI:	EKBPFWMJ11Z5

Project Title: Municipal Safety Hubs: A New Model of Community-Centered Safety Infrastructure in Local Government	**Award Number:** 15PBJA-24-GK-02981-JAGP
Solicitation Title: BJA FY24 Reimagining Justice: Testing a New Model of Community Safety	
Federal Award Amount: $2,000,000.00	**Federal Award Date:** 9/25/24
Awarding Agency:	Office of Justice Programs Bureau of Justice Assistance
Funding Instrument Type:	CA
Opportunity Category: D **Assistance Listing:** 16.738 - Edward Byrne Memorial Justice Assistance Grant Program	
Project Period Start Date: 10/1/24	**Project Period End Date:** 9/30/27
Budget Period Start Date: 10/1/24	**Budget Period End Date**: 9/30/27

Project Description:

The Vera Institute of Justice (Vera) will utilize this funding to implement Municipal Safety Hubs, a new model of community-centered safety infrastructure in local government. Vera will provide technical assistance and subawards to the Albuquerque (New Mexico) Community Safety Department and The City of Richmond (California) Community Services Department, Office of Neighborhood Safety to create and sustain civilian-led safety hubs. These safety hubs will utilize a data-informed, community-centered, needs-based public health approach to address public safety and social needs, without relying solely on traditional law enforcement responses. The project focuses on refining a civilian-led public safety plan, expanding capacity for collecting and analyzing public safety data, and fostering engagement and accountability to system impacted community stakeholders. This project will focus on high-need areas, addressing incidents related to mental and behavioral health issues, disturbances, and survival behaviors that too often become criminalized when the only available response is law enforcement (e.g. behavioral health crises, public disturbances, loitering, unwanted persons, public intoxication, and trespassing). Also, Vera will engage a diverse cross-section of system-impacted residents, civilian government agencies, community-based organizations, and local stakeholders to develop strategies, mechanisms, and measures of success for greater coordination, integration, and accountability to system-impacted communities in advancing a shared vision of public safety.

Award Letter

September 25, 2024

Dear Adair Iacono,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by VERA INSTITUTE OF JUSTICE, INC. for an award under the funding opportunity entitled 2024 BJA FY24 Reimagining Justice: Testing a New Model of Community Safety. The approved award amount is $2,000,000.
Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Brent J. Cohen
Acting Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) enforces federal civil rights laws and other provisions that prohibit discrimination by recipients of federal financial assistance from OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW).

Several civil rights laws, including Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance (recipients) to give assurances that they will comply with those laws. Taken together, these and other civil rights laws prohibit recipients from discriminating in the provision of services and employment because of race, color, national origin, religion, disability, and sex or from discriminating in the provision of services on the bases of age.

Some recipients of DOJ financial assistance have additional obligations to comply with other applicable nondiscrimination provisions like the Omnibus Crime Control and Safe Streets Act of 1968, which prohibits discrimination on the basis of religion in addition to race, color, national origin, and sex. Recipients may also have related requirements regarding the development and implementation of equal employment opportunity programs.

OCR provides technical assistance, training, and other resources to help recipients comply with civil rights obligations. Further, OCR administratively enforces civil rights laws and nondiscrimination provisions by investigating DOJ recipients that are the subject of discrimination complaints. In addition, OCR conducts compliance reviews of DOJ recipients based on regulatory criteria. These investigations and compliance reviews permit OCR to evaluate whether DOJ recipients are providing services to the public and engaging in employment practices in a nondiscriminatory manner.

For more information about OCR, your civil rights and nondiscrimination responsibilities, how to notify your employees or beneficiaries of their civil rights protections and responsibilities and how to file a complaint, as well as technical assistance, training, and other resources, please visit www.ojp.gov/program/civil-rights-office/outreach. If you would like OCR to assist you in fulfilling your civil rights or nondiscrimination responsibilities, please contact us at askOCR@ojp.usdoj.gov or www.ojp.gov/program/civil-rights-office/about#ocr-contacts.

Memorandum Regarding NEPA

NEPA Letter Type
OJP - Categorical Exclusion

NEPA Letter

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third party action:

(1) New construction

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species

(3) A renovation that will change the basic prior use of a facility or significantly change its size

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment

(5) Implementation of a program involving the use of chemicals (including the identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or Orbin Terry, Environmental Coordinator for the Bureau of Justice Assistance.

NEPA Coordinator

First Name	Middle Name	Last Name
Orbin		Terry

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
VERA INSTITUTE OF JUSTICE, INC.

UEI
EKBPFWMJ11Z5

Street 1
34 35TH ST

Street 2
STE 4-2A

City
BROOKLYN

State/U.S. Territory
New York

Zip/Postal Code
11232

Country
United States

County/Parish
no value

Province
no value

Award Details

Federal Award Date
9/25/24

Award Type
Initial

Award Number
15PBJA-24-GK-02981-JAGP

Supplement Number
00

Federal Award Amount
$2,000,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.738	Edward Byrne Memorial Justice Assistance Grant Program

Statutory Authority

Pub. L. No. 90-351, Title I, Sec. 506(b) (codified at 34 U.S.C. 10157(b)). The Edward Byrne Memorial Justice Assistance Grant (JAG) Program authorization provides that up to 5 percent of the funds available to carry out subpart 1 of Title I, Part E of the Omnibus Crime Control and Safe Streets Act of 1968 may be granted, among other reasons, for one or more of the purposes specified in 34 U.S.C. § 10152 upon a determination that it is necessary "to combat, address, or otherwise respond to precipitous or extraordinary increases in crime, or in a type or types of crime." 34 U.S.C. § 10157(b)(1).

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title

2024 BJA FY24 Reimagining Justice: Testing a New

Model of Community Safety

Program Office
BJA

Application Number
GRANT14193220

Grant Manager	Phone Number	E-mail Address
Cynthia Tims	202-735-7638	Cynthia.Tims@usdoj.gov

Project Title
Municipal Safety Hubs: A New Model of Community-Centered Safety Infrastructure in Local Government

Performance Period Start Date	Performance Period End Date
10/01/2024	09/30/2027

Budget Period Start Date	Budget Period End Date
10/01/2024	09/30/2027

Project Description
The Vera Institute of Justice (Vera) will utilize this funding to implement Municipal Safety Hubs, a new model of community-centered safety infrastructure in local government. Vera will provide technical assistance and subawards to the Albuquerque (New Mexico) Community Safety Department and The City of Richmond (California) Community Services Department, Office of Neighborhood Safety to create and sustain civilian-led safety hubs. These safety hubs will utilize a data-informed, community-centered, needs-based public health approach to address public safety and social needs, without relying solely on traditional law enforcement responses. The project focuses on refining a civilian-led public safety plan, expanding capacity for collecting and analyzing public safety data, and fostering engagement and accountability to system impacted community stakeholders. This project will focus on high-need areas, addressing incidents related to mental and behavioral health issues, disturbances, and survival behaviors that too often become criminalized when the only available response is law enforcement (e.g. behavioral health crises, public disturbances, loitering, unwanted persons, public intoxication, and trespassing). Also, Vera will engage a diverse cross-section of system-impacted residents, civilian government agencies, community-based organizations, and local stakeholders to develop strategies, mechanisms, and measures of success for greater coordination, integration, and accountability to system-impacted communities in advancing a shared vision of public safety.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Condition 1
Meaningful access requirement for individuals with limited English proficiency

The recipient, and any subrecipient at any tier, must take reasonable steps to ensure that individuals with limited English proficiency (LEP) have meaningful access to their programs and activities to comply with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of national origin, including discrimination against individuals with LEP. Such steps may require providing language assistance services, such as interpretation or translation services. The Department of Justice guidance on compliance with this requirement may be found at "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (67 Fed. Reg. 41455-41472) (https://www.federalregister.gov/d/02-15207) and is incorporated by reference here.

Condition 2
Compliance with general appropriations-law restrictions on the use of federal funds (FY 2024)
The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions that may be set out in applicable appropriations acts are indicated at https://ojp.gov/funding/Explore/FY24AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

Condition 3
Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

Condition 4
Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

Condition 5
Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this award from OJP.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

Condition 6
Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

Condition 7
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38.

Among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38 also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

Recipients and subrecipients that provide social services under this award must give written notice to beneficiaries and prospective beneficiaries prior to the provision of services (if practicable) which shall include language substantially similar to the language in 28 CFR Part 38, Appendix C, sections (1) through (4). A sample written notice may be found at https://www.ojp.gov/program/civil-rights-office/partnerships-faith-based-and-other-neighborhood-organizations.

In certain instances, a faith-based or religious organization may be able to take religion into account when making hiring decisions, provided it satisfies certain requirements. For more information, please see https://www.ojp.gov/funding/explore/legaloverview2024/civilrightsrequirements.

Condition 8
Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

Condition 9
Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

Condition 10
Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

Condition 11
Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

Condition 12
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

Among other items, 28 C.F.R. § 42.106(d), 28 C.F.R. § 42.405(c), and 28 C.F.R. § 42.505(f) contain notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

Condition 13
Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

Condition 14
Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

Condition 15
Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for

the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

Condition 16
Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

Condition 17
Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

Condition 18
Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

Condition 19
OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

Condition 20
Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of

federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

Condition 21
Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

Condition 22
Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after January 1, 2021, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

Condition 23
Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

Condition 24
Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and

OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

Condition 25
Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

Condition 26
Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

Condition 27
Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

Condition 28
Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety,” OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient (“subgrantee”) at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the “controlled equipment” list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition:

Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

Condition 29
Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

Condition 30
All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

Condition 31
Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

Among other items, 28 C.F.R. § 54.140 contains notice requirements that covered recipients must follow regarding the dissemination of information regarding federal nondiscrimination requirements.

Condition 32
The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

Condition 33
The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the

recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJA's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).

Condition 34
The recipient agrees that no funds under this grant award (including via subcontract or subaward, at any tier) may be used for unmanned aircraft systems (UAS), which includes unmanned aircraft vehicles (UAV), or for any accompanying accessories to support UAS.

Condition 35
Verification and updating of recipient contact information

The recipient must verify its Grant Award Administrator, Financial Manager, and Authorized Representative contact information in JustGrants, including telephone number and e-mail address. If any information is incorrect or has changed, the award recipient's Entity Administrator must make changes to contact information through DIAMD. Instructions on how to update contact information in JustGrants can be found at https://justicegrants.usdoj.gov/training/training-entity-management.

Condition 36
The recipient agrees to submit to BJA for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award at least thirty (30) working days prior to the targeted dissemination date. The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities. Any products developed under this award, (with the exception of press releases, web sites, and mobile applications), shall contain the following statements: "This project was supported by Grant No. <Award_Number> awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." (Note: A separate disclaimer has been developed and is required for web sites and mobile applications. No disclaimer is required for press releases.)

Condition 37
Any Web site that is funded in whole or in part under this award must include the following statement on the home page, on all major entry pages (i.e., pages (exclusive of documents) whose primary purpose is to navigate the user to interior content), and on any pages from which a visitor may access or use a Web-based service, including any pages that provide results or outputs from the service: "This Web site is funded in whole or in part through a grant from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)." The full text of the foregoing statement must be clearly visible on the home page. On other pages, the statement may be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

Condition 38
FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

Condition 39
Confidentiality of data

The recipient (and any subrecipient at any tier) must comply with all confidentiality requirements of 34 U.S.C. 10231 and 28 C.F.R. Part 22 that are applicable to collection, use, and revelation of data or information. The recipient further agrees, as a condition of award approval, to submit a Privacy Certificate that is in accord with requirements of 28 C.F.R. Part 22 and, in particular, 28 C.F.R. 22.23.

Condition 40
The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.

Condition 41
Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

Condition 42
Protection of human research subjects

The recipient (and any subrecipient at any tier) must comply with the requirements of 28 C.F.R. Part 46 and all OJP policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.

Condition 43
Required attendance at BJA-sponsored events

The recipient (and its subrecipients at any tier) must participate in BJA-sponsored training events, technical assistance events, or conferences held by BJA or its designees, upon BJA's request.

Condition 44
Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

Condition 45

The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

Condition 46
The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

Condition 47
Justice Information Sharing

Information sharing projects funded under this award must comply with DOJ's Global Justice Information Sharing Initiative (Global) guidelines. The recipient (and any subrecipient at any tier) must conform to the Global Standards Package (GSP) and all constituent elements, where applicable, as described at: https:/ / it.ojp.gov/ gsp_grantcondition. The recipient (and any subrecipient at any tier) must document planned approaches to information sharing and describe compliance with the GSP and appropriate privacy policy that protects shared information, or provide detailed justification for why an alternative approach is recommended.

Condition 48
Compliance with 28 C.F.R. Part 23

With respect to any information technology system funded or supported by funds under this award, the recipient (and any subrecipient at any tier) must comply with 28 C.F.R. Part 23, Criminal Intelligence Systems Operating Policies, if OJP determines this regulation to be applicable. Should OJP determine 28 C.F.R. Part 23 to be applicable, OJP may, at its discretion, perform audits of the system, as per the regulation. Should any violation of 28 C.F.R. Part 23 occur, the recipient may be fined as per 34 U.S.C. 10231(c)-(d). The recipient may not satisfy such a fine with federal funds.

Condition 49
The Project Director and/or any other key program personnel designated in the application shall be replaced only for compelling reasons. Successors to key personnel must be approved by OJP, and such approval is contingent upon submission of appropriate information, including, but not limited to, a resume. Changes in program personnel, other than key personnel, require only notification to OJP and submission of resumes, unless otherwise designated in the award document.

Condition 50
Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

Condition 51
The recipient agrees to budget funds for one staff representative to attend BJA's Annual Training and Technical Assistance Providers' Meeting once a year for two to three (2-3) days in Washington, D.C. In addition, the recipient agrees to participate in BJA training events, technical assistance events, or conferences held by BJA or its designees, upon request.

Condition 52
Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the BJA has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and BJA's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and BJA will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, BJA, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with BJA. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and BJA. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

Condition 53
The recipient agrees to track and report to BJA on its training and technical assistance activities and deliverables progress using the guidance and format provided by BJA.

Condition 54
Recipient understands and agrees not to engage in activities constituting organizational conflicts of interest, such as

bidding on specifications it guided as part of the provision of training and technical assistance under this award. Actions that may give rise to organizational conflicts of interest under awards are described in the Procurement Standards in 2 C.F.R. Part 200 (the Part 200 Uniform Requirements) and the DOJ Grants Financial Guide. Prior approval from the grant manager is required for any work with an organization or entity that would receive training or technical assistance under this award.

Condition 55
The recipient's budget (and budget narrative) is pending clearance by OJP.

Prior to budget clearance (and unless there is a more restrictive condition on this award, in which case the terms of that more restrictive condition apply): The recipient may not drawdown more than 10% of the award. Pre-clearance obligations, expenditures, and drawdowns may be disallowed if not in compliance with program requirements.

The recipient should be judicious in using award funds prior to budget clearance. Generally, OJP expects that recipients (depending on the specific project scope) may need to advertise for award-funded positions, pay personnel and fringe benefits for positions budgeted under the award, plan for project activities, attend training and pay training-related travel needed to begin the project, and engage in other limited activities conducted by recipient staff (i.e., generally not requiring a subaward or procurement contract under an award).

OJP will issue an Award Condition Modification upon budget clearance.

[X] *I have read and understand the information presented in this section of the Federal Award Instrument.*

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Acting Assistant Attorney General	Brent J. Cohen	9/22/24 1:36 PM

Authorized Representative

[X]

Entity Acceptance

Title of Authorized Entity Official
Chief Legal and Information Officer, Secretary

Name of Authorized Entity Official
Adair Iacono

Signed Date And Time
10/28/2024 12:14 PM

EXHIBIT 3

Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient:	VERA INSTITUTE OF JUSTICE, INC. 34 35TH ST STE 4-2A
City, State and Zip:	BROOKLYN, NY 11232
Recipient UEI:	EKBPFWMJ11Z5

Project Title: Motion for Justice: Partnering with Prosecutors and Impacted Communities to Remove Barriers and Expand Access to Community-Led Diversion Programming	**Award Number:** 15PBJA-23-GK-05353-MUMU
Solicitation Title: BJA FY 23 Field Initiated: Encouraging Innovation	
Federal Award Amount: $1,000,000.00	**Federal Award Date:** 9/28/23
Awarding Agency:	Office of Justice Programs Bureau of Justice Assistance
Funding Instrument Type:	CA

Opportunity Category: D
Assistance Listing:
16.738 - Edward Byrne Memorial Justice Assistance Grant Program

16.812 - Second Chance Act Reentry Initiative

Project Period Start Date: 10/1/23	**Project Period End Date:** 9/30/26
Budget Period Start Date: 10/1/23	**Budget Period End Date**: 9/30/26

Project Description:
The Vera Institute of Justice's (Vera) Reshaping Prosecution initiative seeks funding to address inequities in access to diversion programs for justice-involved communities. Vera will partner with prosecutors and community-based organizations that serve justice-involved communities to build or expand a diversion program that addresses a health and safety need in the local community and includes the following features: (1) has no automatic exclusions based on criminal history, (2) has no mandatory fines or fees, (3) adopts a needs-based public health approach (as opposed to an offense-based approach), (4) provides programming and case management through a community-based organization, and (5) consults justice-involved communities to create metrics to evaluate the diversion program. Each partnership will include three main components: collaboration with a community partner to implement and support their diversion program through research support and other resources, collaboration with the prosecutor's office to implement racially equitable processes for diversion referrals, and quantitative and qualitative research to collect data for process and outcome evaluations of diversion programs. Vera will also provide subgrants to the community partners to support increasing diversion capacity.

Expected products include implementation and evaluation tools such as guides and fact sheets for building and evaluating the success of the previously described diversion programs; a report to share lessons learned and qualitative and quantitative research collected from the partnerships, including around recidivism and metrics chosen by the local community; and a Vera-led learning community of past partners to support sustainability and help spread similar diversion programs across the field.

Award Letter

September 28, 2023

Dear Jim Parsons,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by VERA INSTITUTE OF JUSTICE, INC. for an award under the funding opportunity entitled 2023 BJA FY 23 Field Initiated: Encouraging Innovation. The approved award amount is $1,000,000.
Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Amy Solomon
Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see https://ojp.gov/funding/Explore/LegalOverview/CivilRightsRequirements.htm.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria.

These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOPs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEOP requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type

OJP - Categorical Exclusion

NEPA Letter

Project funded under the Field Initiated: Encouraging Innovation Solicitation will develop and implement new and innovative strategies that better enable criminal justice systems to prevent and respond to emerging and chronic crime problems that affect multiple agencies within the justice system and many communities in the United States. None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third party action:

(1) New construction.

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species.

(3) A renovation which will change the basic prior use of a facility or significantly change its size.

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment.

(5) Implementation of a program involving the use of chemicals.

Additionally, the proposed action is neither a phase nor a segment of a project which when reviewed in its entirety would not meet the criteria for a categorical exclusion. Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or Environmental Coordinator for the Bureau of Justice Assistance.

NEPA Coordinator

First Name	Middle Name	Last Name
Orbin		Terry

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
VERA INSTITUTE OF JUSTICE, INC.

UEI
EKBPFWMJ11Z5

Street 1
34 35TH ST STE 4-2A

Street 2

City
BROOKLYN

State/U.S. Territory
New York

Zip/Postal Code
11232

Country
United States

County/Parish

Province

Award Details

Federal Award Date
9/28/23

Award Type
Initial

Award Number
15PBJA-23-GK-05353-MUMU

Supplement Number
00

Federal Award Amount
$1,000,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.738	Edward Byrne Memorial Justice Assistance Grant Program
16.812	Second Chance Act Reentry Initiative

Statutory Authority

Any awards under this solicitation would be made under statutory authority provided by one or more of the following: Pub. L. No. 90-351, Title I, Sec. 506(b) (codified at 34 U.S.C. 10157(b)); Department of Justice Appropriations Act, 2023, (Pub. L. No. 117-328; 136 Stat. 4459, 4536 - 4537); Pub. L. No. 111-84, Div. E, Sec. 4704 (codified at 34 U.S.C. 30503); Pub. L. No. 90-351, Title I, Part EE (codified at 34 U.S.C. 10611 - 10619); Pub. L. No. 110-199, Sec. 115 (codified at 34 U.S.C. 60511) and Sec. 201 (codified at 34 U.S.C. 60521). The Edward Byrne Memorial Justice Assistance Grant (JAG) Program authorization provides that up to 5 percent of the funds available to carry out subpart 1 of Title I, Part E of the Omnibus Crime Control and Safe Streets Act of 1968 may be granted, among other reasons, for one or more of the purposes specified in 34 U.S.C. § 10152 upon a determination that it is necessary “to combat, address, or otherwise respond to precipitous or extraordinary increases in crime, or in a type or types of crime.” 34 U.S.C. § 10157(b)(1).

Pub. L. No. 110-115, Sec. 115 (codified at 34 U.S.C. 60511); Department of Justice Appropriations Act, 2023 (Pub. L. No. 117-328; 136 Stat. 4459, 4536)

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title
2023 BJA FY 23 Field Initiated: Encouraging Innovation

Awarding Agency
OJP

Program Office
BJA

Application Number
GRANT13896841

Grant Manager Name
Michael Austin

Phone Number
202-598-5292

E-mail Address
Michael.Austin3@usdoj.gov

Project Title
Motion for Justice: Partnering with Prosecutors and Impacted Communities to Remove Barriers and Expand Access to Community-Led Diversion Programming

Performance Period Start Date
10/01/2023

Performance Period End Date
09/30/2026

Budget Period Start Date
10/01/2023

Budget Period End Date
09/30/2026

Project Description
The Vera Institute of Justice's (Vera) Reshaping Prosecution initiative seeks funding to address inequities in access to diversion programs for justice-involved communities. Vera will partner with prosecutors and community-based organizations that serve justice-involved communities to build or expand a diversion program that addresses a health and safety need in the local community and includes the following features: (1) has no automatic exclusions based on criminal history, (2) has no mandatory fines or fees, (3) adopts a needs-based public health approach (as opposed to an offense-based approach), (4) provides programming and case management through a community-based organization, and (5) consults justice-involved communities to create metrics to evaluate the diversion program. Each partnership will include three main components: collaboration with a community partner to implement and support their diversion program through research support and other resources, collaboration with the prosecutor's office to implement racially equitable processes for diversion referrals, and quantitative and qualitative research to collect data for process and outcome evaluations of diversion programs. Vera will also provide subgrants to the community partners to support increasing diversion capacity.

Expected products include implementation and evaluation tools such as guides and fact sheets for building and evaluating the success of the previously described diversion programs; a report to share lessons learned and qualitative and quantitative research collected from the partnerships, including around recidivism and metrics chosen by the local community; and a Vera-led learning community of past partners to support sustainability and help spread similar diversion programs across the field.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

1

Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety,” OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient (“subgrantee”) at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the “controlled equipment” list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition: Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

2

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

3

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

4

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2022 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2022 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2022 award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

5

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

6

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

7

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

8

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2022)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2022, are set out at https://www.ojp.gov/funding/Explore/FY22AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

9

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

Currently, among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38, currently, also sets out rules and requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at https://www.ecfr.gov/cgi-bin/ECFR?page=browse), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

10

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

11

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may

result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

12

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

13

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

14

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

15

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

16

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with

participating minors), and are incorporated by reference here.

17

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

18

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

19

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or

both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

20

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

21

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

22

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

23

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

24

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

25

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

26

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

27

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any

inappropriate duplication of funding.

28

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

29

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

30

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

31

The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

32

Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

33

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

34

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

35

The recipient agrees that no funds under this grant award (including via subcontract or subaward, at any tier) may be used for unmanned aircraft systems (UAS), which includes unmanned aircraft vehicles (UAV), or for any accompanying accessories to support UAS.

36

Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

37

The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJA's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ

awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).

38

The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.

39

Use of program income

Program income (as defined in the Part 200 Uniform Requirements) must be used in accordance with the provisions of the Part 200 Uniform Requirements. Program income earnings and expenditures both must be reported on the quarterly Federal Financial Report, SF 425.

40

Protection of human research subjects

The recipient (and any subrecipient at any tier) must comply with the requirements of 28 C.F.R. Part 46 and all OJP policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.

41

Applicants must ensure that Limited English Proficiency persons have meaningful access to the services under this program(s). National origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI and the Safe Streets Act, recipients are required to take reasonable steps to ensure that LEP persons have meaningful access to their programs. Meaningful access may entail providing language assistance services, including oral and written translation when necessary. The U.S. Department of Justice has issued guidance for grantees to help them comply with Title VI requirements. The guidance document can be accessed on the Internet at www.lep.gov.

42

Copyright; Data rights

The recipient acknowledges that OJP reserves a royalty-free, non-exclusive, and irrevocable license to reproduce, publish, or otherwise use, and authorize others to use (in whole or in part, including in connection with derivative works), for Federal purposes: (1) any work subject to copyright developed under an award or subaward (at any tier); and (2) any rights of copyright to which a recipient or subrecipient (at any tier) purchases ownership with Federal support.

The recipient acknowledges that OJP has the right to (1) obtain, reproduce, publish, or otherwise use the data first produced under any such award or subaward; and (2) authorize others to receive, reproduce, publish, or otherwise use such data for Federal purposes. "Data" includes data as defined in Federal Acquisition Regulation (FAR) provision 52.227-14 (Rights in Data - General).

It is the responsibility of the recipient (and of each subrecipient (at any tier), if applicable) to ensure that the provisions of this condition are included in any subaward (at any tier) under this award.

The recipient has the responsibility to obtain from subrecipients, contractors, and subcontractors (if any) all rights and data necessary to fulfill the recipient's obligations to the Government under this award. If a proposed subrecipient, contractor, or subcontractor refuses to accept terms affording the Government such rights, the recipient shall promptly bring such refusal to the attention of the OJP program manager for the award and not proceed with the agreement in question without further authorization from the OJP program office.

43

Justification of consultant rate

Approval of this award does not indicate approval of any consultant rate in excess of $650 per day. A detailed justification must be submitted to and approved by the OJP program office prior to obligation or expenditure of such funds.

44

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the BJA has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and BJA's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and BJA will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, BJA, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with BJA. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and BJA. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

45

The recipient agrees to submit to BJA for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award at least thirty (30) working days prior to the targeted dissemination date. The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities. Any products developed under this award, (with the exception of press releases, web sites, and mobile applications), shall contain the following statements: “This project was supported by Grant No. <Award_Number> awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." (Note: A separate disclaimer has been developed and is required for web sites and mobile applications. No disclaimer is required for press releases.)

46

Any Web site that is funded in whole or in part under this award must include the following statement on the home page, on all major entry pages (i.e., pages (exclusive of documents) whose primary purpose is to navigate the user to interior content), and on any pages from which a visitor may access or use a Web-based service, including any pages that provide results or outputs from the service: "This Web site is funded in whole or in part through a grant from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)." The full text of the foregoing statement must be clearly visible on the home page. On other pages, the statement may be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

47

Required monitoring of subawards

The recipient must monitor subawards under this award in accordance with all applicable statutes, regulations, award conditions, and the DOJ Grants Financial Guide, and must include the applicable conditions of this award in any subaward. Among other things, the recipient is responsible for oversight of subrecipient spending and monitoring of specific outcomes and benefits attributable to use of award funds by subrecipients. The recipient agrees to submit, upon request, documentation of its policies and procedures for monitoring of subawards under this award.

48

Verification and updating of recipient contact information

The recipient must verify its Grant Award Administrator, Financial Manager, and Authorized Representative contact information in JustGrants, including telephone number and e-mail address. If any information is incorrect or has changed, the award recipient's Entity Administrator must make changes to contact information through DIAMD. Instructions on how to update contact information in JustGrants can be found at https://justicegrants.usdoj.gov/training/training-entity-management.

49

The research partner must conduct an evaluation of all grant-funded activities. The recipient agrees to upload into JustGrants as an award Deliverable, an interim update from the research partner on evaluation activities to date no later than 18 months after the performance period begins.

50

The recipient must deliver to BJA, by the termination of the award period, an electronic copy of the Final Analysis and Report by the research partner of all grant-funded activities. The final Analysis and Report by the research partner must be submitted as a Deliverable via upload into the JustGrants System.

51

The recipient understands and agrees that no more than 20 percent of the total amount of this award may be used by the recipient for research or evaluation services.

52

In collaboration with the identified researcher, the recipient must develop and submit an action plan for review no later than 180 days after receiving final approval of the project's budget from OCFO, unless an extension for good cause shown has been granted by BJA. Failure to submit the action plan within 180 days of final budget approval may result in the freezing of grant funds.

53

The recipient's budget (and budget narrative) is pending clearance by OJP.

Prior to budget clearance (and unless there is a more restrictive condition on this award, in which case the terms of that more restrictive condition apply): The recipient may not drawdown more than 10% of the award. Pre-clearance obligations, expenditures, and drawdowns may be disallowed if not in compliance with program requirements.

The recipient should be judicious in using award funds prior to budget clearance. Generally, OJP expects that recipients (depending on the specific project scope) may need to advertise for award-funded positions, pay personnel and fringe benefits for positions budgeted under the award, plan for project activities, attend training and pay training-related travel needed to begin the project, and engage in other limited activities conducted by recipient staff (i.e., generally not requiring a subaward or procurement contract under an award).

OJP will issue an Award Condition Modification upon budget clearance.

[X]
I have read and understand the information presented in this section of the Federal Award Instrument.

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this

declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Assistant Attorney General	Amy Solomon	9/26/23 8:02 PM

Authorized Representative

Declaration and Certification

Entity Acceptance

Title of Authorized Entity Official
General Counsel and Secretary

Name of Authorized Entity Official
Adair Iacono

Signed Date And Time
10/27/2023 12:38 PM

EXHIBIT 4

Award Letter

September 27, 2023

Dear Jim Parsons,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by VERA INSTITUTE OF JUSTICE, INC. for an award under the funding opportunity entitled 2023 BJA FY 23 Transforming Prison Cultures, Climates, and Spaces. The approved award amount is $1,500,000.

Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

Prior to accepting the award, your Entity Administrator must assign a Financial Manager, Grant Award Administrator, and Authorized Representative(s) in the Justice Grants System (JustGrants). The Entity Administrator will need to ensure the assigned Authorized Representative(s) is current and has the legal authority to accept awards and bind the entity to the award terms and conditions. To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

To access your funds, you will need to enroll in the Automated Standard Application for Payments (ASAP) system, if you haven't already completed the enrollment process in ASAP. The Entity Administrator should have already received an email from ASAP to initiate this process.

Congratulations, and we look forward to working with you.

Amy Solomon
Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the

Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see https://ojp.gov/funding/Explore/LegalOverview/CivilRightsRequirements.htm.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria. These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOPs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEOP requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type

OJP - Categorical Exclusion

NEPA Letter

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third-party action:

(1) New construction

(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property

(a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species

(3) A renovation that will change the basic prior use of a facility or significantly change its size

(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment

(5) Implementation of a program involving the use of chemicals (including the

identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion. Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or Orbin Terry, Environmental Coordinator for the Bureau of Justice Assistance.

NEPA Coordinator

First Name	Middle Name	Last Name
Orbin		Terry

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
VERA INSTITUTE OF JUSTICE, INC.

UEI
EKBPFWMJ11Z5

Street 1
34 35TH ST STE 4-2A

Street 2

City
BROOKLYN

State/U.S. Territory
New York

Zip/Postal Code
11232

Country
United States

County/Parish

Province

Award Details

Federal Award Date
9/27/23

Award Type
Initial

Award Number
15PBJA-23-GK-05375-SCAX

Supplement Number
00

Federal Award Amount
$1,500,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.606	State Criminal Alien Assistance Program

Statutory Authority

Pub. L. No. 90-351, Title I, Sec. 2976 (codified at 34 U.S.C. 10631); Department of Justice Appropriations Act, 2023 (Pub. L. No. 117-328; 136 Stat. 4459, 4536)

☑

I have read and understand the information presented in this section of the Federal Award Instrument.

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title
2023 BJA FY 23 Transforming Prison Cultures, Climates, and Spaces

Awarding Agency
OJP

Program Office
BJA

Application Number
GRANT13936964

Grant Manager Name	Phone Number
Kimberly Williams	202-532-3796

E-mail Address
Kimberly.P.Williams@usdoj.gov

Project Title
Designed for Dignity: Transforming Prison Culture, Climates, and Spaces

Performance Period Start Date	Performance Period End Date
10/01/2023	09/30/2026

Budget Period Start Date	Budget Period End Date
10/01/2023	09/30/2026

Project Description

Corrections agencies are grappling with how to create safe and humane environments for people who work, visit, and are incarcerated in prison; to

recruit and retain staff; and to sustain efforts that promote incarcerated people's successful reentry to the community. Transforming the cultures, climates, and spaces in prisons is essential to enhance safety, improve the dynamics between staff and incarcerated people, create community and a sense of purpose beyond custody and control, and shape a culture that centers the dignity of both staff and incarcerated people. To address the critical problem of transforming prison cultures, climates, and spaces, the Vera Institute of Justice (Vera) is expanding its groundbreaking work of Restoring Promise through a new project, Designed for Dignity.

Vera will inspire and broadly support the corrections field to transform its cultures, climates, and spaces by selecting eight diverse agencies to use the Designed for Dignity framework—to assess and transform their policies, training, and resource allocations so they are better aligned with dignity and to achieve their mission-critical goals.

The transformation process will be successful by leveraging the leadership of trained corrections professionals and incarcerated people and proceeding in three stages: learning and strategy design, change management, and sustainability. Beyond the eight agencies selected to get support with the Designed for Dignity framework, Vera will provide support to the field by developing and disseminating resources and responding to ad hoc requests. Vera will proactively build field knowledge and capacity throughout the course of the project—maintaining an up-to-date review of the literature, best practices in corrections, and innovations in corrections cultures, climates, and spaces.

By combining the expertise of corrections professionals and incarcerated people with Vera's experience in on the ground, evidence-based prison transformation work, Designed for Dignity will bring about meaningful and sustainable changes in the participating correctional agencies and build field knowledge and capacity for transforming prison cultures, climates, and spaces. Designed for Dignity will result in greater safety for all, successful re-entry for incarcerated people, and staff who are well and have purpose.



I have read and understand the information presented in this section of the Federal Award Instrument.

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

☑

I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

1

Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards

Consistent with Executive Order 14074, “Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety,” OJP has prohibited the use of federal funds under this award for purchases or transfers of specified equipment by law enforcement agencies. In addition, OJP requires the recipient, and any subrecipient (“subgrantee”) at any tier, to put in place specified controls prior to using federal funds under this award to acquire or transfer any property identified on the “controlled equipment” list. The details of the requirement are posted on the OJP web site at https://www.ojp.gov/funding/explore/prohibited-and-controlled-equipment (Award condition: Compliance with restrictions on the use of federal funds--prohibited and controlled equipment under OJP awards), and are incorporated by reference here.

2

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

3

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

4

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2022 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2022 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2022 award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.334.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

5

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined

by DOJ), including the provision of food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

6

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

7

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

8

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2022)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2022, are set out at https://www.ojp.gov/funding/Explore/FY22AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

9

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

Currently, among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38, currently, also sets out rules and requirements that pertain to recipient and

subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at https://www.ecfr.gov/cgi-bin/ECFR?page=browse), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

10

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

11

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

12

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

13

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

14

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

15

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://www.ojp.gov/funding/implement/training-guiding-principles-grantees-and-subgrantees.

16

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

17

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

18

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://onlinegfmt.training.ojp.gov/. All trainings that satisfy this condition include a

session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

19

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or

otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

20

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

21

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

22

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

23

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

24

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

25

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

26

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at

https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

27

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

28

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

29

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at

https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

30

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

31

The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

32

Any Web site that is funded in whole or in part under this award must include the following statement on the home page, on all major entry pages (i.e., pages (exclusive of documents) whose primary purpose is to navigate the user to interior content), and on any pages from which a visitor may access or use a Web-based service, including any pages that provide results or outputs from the service: "This Web site is funded in whole or in part through a grant from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Neither the U.S. Department of Justice nor any of its components operate, control, are responsible for, or necessarily endorse, this Web site (including, without limitation, its content, technical infrastructure, and policies, and any services or tools provided)." The full text of the foregoing statement must be clearly visible on the home page. On other pages, the statement may be included through a link, entitled "Notice of Federal Funding and Federal Disclaimer," to the full text of the statement.

33

TTA Awards: Tracking and Reporting Data

The recipient understands and agrees to track and report data on all training and technical assistance activities and deliverables using the guidance, format, or tool provided by the Program Office or OJP.

34

Recipient understands and agrees not to engage in activities constituting organizational conflicts of interest, such as bidding on specifications it guided as part of the provision of training and technical assistance under this award. Actions that may give rise to organizational conflicts of interest under awards are described in the Procurement Standards in 2 C.F.R. Part 200 (the Part 200 Uniform Requirements) and the DOJ Grants Financial Guide. Prior approval from the grant manager is required for any work with an organization or entity that would receive training or technical assistance under this award.

35

Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

36

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the BJA has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and BJA's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and BJA will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, BJA, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with BJA. In addition to its programmatic reporting requirements, the recipient agrees to provide necessary information as requested by OJP and BJA. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

37

The recipient agrees that no funds under this grant award (including via subcontract or subaward, at any tier) may be used for unmanned aircraft systems (UAS), which includes unmanned aircraft vehicles (UAV), or for any accompanying accessories to support UAS.

38

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than $30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

39

The recipient agrees to comply with OJP grant monitoring guidelines, protocols, and procedures, and to cooperate with BJA and OCFO on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits. The recipient agrees to provide to BJA and OCFO all documentation necessary to complete monitoring tasks, including documentation related to any subawards made under this award. Further, the recipient agrees to abide by reasonable deadlines set by BJA and OCFO for providing the requested documents. Failure to cooperate with BJA's/OCFO's grant monitoring activities may result in sanctions affecting the recipient's DOJ awards, including, but not limited to: withholdings and/or other restrictions on the recipient's access to grant funds; referral to the Office of the Inspector General for audit review; designation of the recipient as a DOJ High Risk grantee; or termination of an award(s).

40

The recipient agrees to submit to BJA for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award at least thirty (30) working days prior to the targeted dissemination date. The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities. Any products developed under this award, (with the exception of press releases, web sites, and mobile applications), shall contain the following statements: “This project was supported by Grant No. <Award_Number> awarded by the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." (Note: A separate disclaimer has been developed and is required for web sites and mobile applications. No disclaimer is required for press releases.)

41

Recipient may not obligate, expend, or drawdown funds until the Bureau of Justice Assistance, Office of Justice Programs has reviewed and approved the Budget Narrative portion of the application and has issued an Award Condition Modification (ACM) informing the recipient of the approval.

42

Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

43

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

44

The recipient's budget (and budget narrative) is pending clearance by OJP.

Prior to budget clearance (and unless there is a more restrictive condition on this award, in which case the terms of that more restrictive condition apply): The recipient may not drawdown more than 10% of the award. Pre-clearance obligations, expenditures, and drawdowns may be disallowed if not in compliance with program requirements.

The recipient should be judicious in using award funds prior to budget clearance. Generally, OJP expects that recipients (depending on the specific project scope) may need to advertise for award-funded positions, pay personnel and fringe benefits for positions budgeted under the award, plan for project activities, attend training and pay training-related travel needed to begin the project, and engage in other limited activities conducted by recipient staff (i.e., generally not requiring a subaward or procurement contract under an award).

OJP will issue an Award Condition Modification upon budget clearance.

45

Within 90 days of this award, the recipient shall submit to the Office of Justice Programs a finalized Memorandum of Understanding (MOU) that reflects the goals and objectives of the project and lists the identities, roles, and contributions of the

participating agencies. The MOU must be signed by the Chief Executive Officer of each collaborating agency. The grantee also agrees to notify the Bureau of Justice Assistance of any change in the status or duties of the collaborating agency partners or individuals.

☑

I have read and understand the information presented in this section of the Federal Award Instrument.

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Assistant Attorney General	Amy Solomon	9/26/23 10:02 AM

Authorized Representative

☑ Declaration and Certification

Entity Acceptance

Title of Authorized Entity Official

General Counsel and Secretary

Name of Authorized Entity Official

Adair Iacono

Signed Date And Time

10/27/2023 12:35 PM

EXHIBIT 5

Award Letter

November 4, 2021

Dear Adair Iacono,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by VERA INSTITUTE OF JUSTICE, INC. for an award under the funding opportunity entitled 2021 OVC FY 2021 Field-Generated Human Trafficking Training and Technical Assistance for Law Enforcement. The approved award amount is $500,000.

Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance.

Please note that award requirements include not only the conditions and limitations set forth in the Award Offer, but also compliance with assurances and certifications that relate to conduct during the period of performance for the award. These requirements encompass financial, administrative, and programmatic matters, as well as other important matters (e.g., specific restrictions on use of funds). Therefore, all key staff should receive the award conditions, the assurances and certifications, and the application as approved by OJP, so that they understand the award requirements. Information on all pertinent award requirements also must be provided to any subrecipient of the award.

Should you accept the award and then fail to comply with an award requirement, DOJ will pursue appropriate remedies for non-compliance, which may include termination of the award and/or a requirement to repay award funds.

To accept the award, the Authorized Representative(s) must accept all parts of the Award Offer in the Justice Grants System (JustGrants), including by executing the required declaration and certification, within 45 days from the award date.

Congratulations, and we look forward to working with you.

Amy Solomon
Acting Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice

(DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see https://ojp.gov/funding/Explore/LegalOverview/CivilRightsRequirements.htm.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria. These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOPs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEOP requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type

OJP - Categorical Exclusion

NEPA Letter

OVC seeks to assist state, local, and tribal jurisdictions in more effectively responding to and combatting all forms of human trafficking, as defined by 22 USC 7102, by collaborating with the field to identify, develop, and build a set of innovative training and technical assistance (TTA) resources that can be used to address gaps in knowledge and training, strengthen programming, build capacity, solve problems, and model new approaches.

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third party action:

(1) New construction
(2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species
(3) A renovation that will change the basic prior use of a facility or significantly change its size
(4) Research and technology whose anticipated and future application could be expected to have an effect on the environment
(5) Implementation of a program involving the use of chemicals (including the identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

Questions about this determination may be directed to your grant manager or Environmental Coordinator for OVC.

NEPA Coordinator

First Name	Middle Name	Last Name
Zoe	— —	French

Award Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Recipient Information

Recipient Name
VERA INSTITUTE OF JUSTICE, INC.

DUNS Number
073299836

Street 1	Street 2
34 35TH ST STE 4-2A	— —

City
BROOKLYN

State/U.S. Territory
New York

Zip/Postal Code
11232

Country
United States

County/Parish
——

Province
——

Award Details

Federal Award Date
11/4/21

Award Type
Initial

Award Number
15POVC-21-GK-03261-HT

Supplement Number
00

Federal Award Amount
$500,000.00

Funding Instrument Type
CA

Assistance Listing Number	Assistance Listings Program Title
16.320	Services for Trafficking Victims

Statutory Authority
34 U.S. Code § 20705

☐ *I have read and understand the information presented in this section of the Federal Award Instrument.*

Project Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

Solicitation Title
2021 OVC FY 2021 Field-Generated Human Trafficking Training and Technical Assistance for Law Enforcement

Awarding Agency
OJP

Program Office
OVC

Application Number
GRANT13302819

Grant Manager Name **Phone Number**
Alissa Huntoon 202-305-1661

E-mail Address
Alissa.Huntoon@ojp.usdoj.gov

Project Title
Training and Technical Assistance for Law Enforcement for Responding to Human Trafficking of People with Disabilities

Performance Period Start Date	Performance Period End Date
10/01/2021	09/30/2024

Budget Period Start Date	Budget Period End Date
10/01/2021	09/30/2024

Project Description

The U.S. Department of State's Trafficking in Persons Report from 2012 states that "[P]ersons with disabilities remain one of the groups most at risk of being trafficked," which the limited research on human trafficking of people with disabilities confirms. Victims with disabilities experience both sex and labor trafficking, with many cases including an element that is unique to people with disabilities: traffickers stealing their government benefits, such as Supplemental Security Income or Social Security Disability Insurance. Victims with disabilities experience

unique risk factors to human trafficking and barriers to accessing safety and justice, including that law enforcement officers lack knowledge on working with victims of trafficking with disabilities, making it more difficult for them to identify human trafficking when perpetrated against people with disabilities, build trust with victims with disabilities, and investigating cases involving victims with disabilities. The Vera Institute of Justice (Vera), in partnership with the International Organization for Adolescents (IOFA),will design a comprehensive, self-paced online training and resources to build law enforcement's knowledge, skill, and comfort working with human trafficking victims with disabilities. The online training program will include a number of courses and topics to be determined by a curriculum development team. The courses will include a combination of short videos, written content, and interactive exercises, in line with adult learning principles. In addition, Vera and IOFA will invite a select group of law enforcement officers with baseline knowledge about human trafficking to participate in two learning cohorts, whom will receive technical assistance to help the officers apply what they have learned from the courses.

☐ *I have read and understand the information presented in this section of the Federal Award Instrument.*

Financial Information

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

The recipient budget is currently under review.

I have read and understand the information presented in this section of the Federal Award Instrument.

Award Conditions

This award is offered subject to the conditions or limitations set forth in the Award Information, Project Information, Financial Information, and Award Conditions.

1

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2021 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2021 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2021 award.

For more information and resources on the Part 200 Uniform Requirements as they relate to OJP awards and subawards ("subgrants"), see the OJP website at https://ojp.gov/funding/Part200UniformRequirements.htm.

Record retention and access: Records pertinent to the award that the recipient (and any subrecipient ("subgrantee") at any tier) must retain -- typically for a period of 3 years from the date of submission of the final expenditure report (SF 425), unless a different retention period applies -- and to which the recipient (and any subrecipient ("subgrantee") at any tier) must provide access, include performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. 200.333.

In the event that an award-related question arises from documents or other materials prepared or distributed by OJP that may appear to conflict with, or differ in some way from, the provisions of the Part 200 Uniform Requirements, the recipient is to contact OJP promptly for clarification.

2

Requirement to report actual or imminent breach of personally identifiable information (PII)

The recipient (and any "subrecipient" at any tier) must have written procedures in place to respond in the event of an actual or imminent "breach" (OMB M-17-12) if it (or a subrecipient) -- (1) creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes

of "Personally Identifiable Information (PII)" (2 CFR 200.1) within the scope of an OJP grant-funded program or activity, or (2) uses or operates a "Federal information system" (OMB Circular A-130). The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to an OJP Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

3

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after January 1, 2019, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after January 1, 2019, will satisfy this condition.

A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at https://www.ojp.gov/training/fmts.htm. All trainings that satisfy this condition include a session on grant fraud prevention and detection.

The recipient should anticipate that OJP will immediately withhold ("freeze") award funds if the recipient fails to comply with this condition. The recipient's failure to comply also may lead OJP to impose additional appropriate conditions on this award.

4

Safe policing and law enforcement subrecipients

If this award is a discretionary award, the recipient agrees that it will not make any subawards to State, local, college, or university law enforcement agencies unless such agencies have been certified by an approved independent credentialing body or have started the certification process. To become certified, law enforcement agencies must meet two mandatory conditions: (1) the agency's use of force policies adhere to all applicable federal, state, and local laws; and (2) the agency's use of force policies prohibit chokeholds except in situations where use of deadly force is allowed by law. For detailed information on this certification requirement, see https://cops.usdoj.gov/SafePolicingEO.

5

Effect of failure to address audit issues

The recipient understands and agrees that the DOJ awarding agency (OJP or OVW, as appropriate) may withhold award funds, or may impose other related requirements, if (as determined by the DOJ awarding agency) the recipient does not satisfactorily and promptly address outstanding issues from audits required by the Part 200 Uniform Requirements (or by the terms of this award), or other outstanding issues that arise in connection with audits, investigations, or reviews of DOJ awards.

6

Requirements of the award; remedies for non-compliance or for materially false statements

The conditions of this award are material requirements of the award. Compliance with any assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.

Limited Exceptions. In certain special circumstances, the U.S. Department of Justice ("DOJ") may determine that it will not enforce, or enforce only in part, one or more requirements otherwise applicable to the award. Any such exceptions regarding enforcement, including any such exceptions made during the period of performance, are (or will be during the period of performance) set out through the Office of Justice Programs ("OJP") webpage entitled "Legal Notices: Special circumstances as to particular award conditions" (ojp.gov/funding/Explore/LegalNotices-AwardReqts.htm), and incorporated by reference into the award.

By signing and accepting this award on behalf of the recipient, the authorized recipient official accepts all material requirements of the award, and specifically adopts, as if personally executed by the authorized recipient official, all assurances or certifications submitted by or on behalf of the recipient that relate to conduct during the period of performance.

Failure to comply with one or more award requirements -- whether a condition set out in full below, a condition incorporated by reference below, or an assurance or certification related to conduct during the award period -- may result in OJP taking appropriate action with respect to the recipient and the award. Among other things, the OJP may withhold award funds, disallow costs, or suspend or terminate the award. DOJ, including OJP, also may take other legal action as appropriate.

Any materially false, fictitious, or fraudulent statement to the federal government related to this award (or concealment or omission of a material fact) may be the subject of criminal prosecution (including under 18 U.S.C. 1001 and/or 1621, and/or 34 U.S.C. 10271-10273), and also may lead to imposition of civil penalties and administrative remedies for false claims or otherwise (including under 31 U.S.C. 3729-3730 and 3801-3812).

Should any provision of a requirement of this award be held to be invalid or unenforceable by its terms, that provision shall first be applied with a limited construction so as to give it the maximum effect permitted by law. Should it be held, instead, that the provision is utterly invalid or -unenforceable, such provision shall be deemed severable from this award.

7

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 38

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

Currently, among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38, currently, also sets out rules and

requirements that pertain to recipient and subrecipient ("subgrantee") organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to recipients and subrecipients that are faith-based or religious organizations.

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at https://www.ecfr.gov/cgi-bin/ECFR?page=browse), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

8

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.

9

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain "education programs."

10

Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

The recipient (and any subrecipient at any tier) must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.

The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.

Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.

11

Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, trainings, and other events

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable laws, regulations, policies, and official DOJ guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (as that term is defined by DOJ), including the provision of

food and/or beverages at such conferences, and costs of attendance at such conferences.

Information on the pertinent DOJ definition of conferences and the rules applicable to this award appears in the DOJ Grants Financial Guide (currently, as section 3.10 of "Postaward Requirements" in the "DOJ Grants Financial Guide").

12

Requirement for data on performance and effectiveness under the award

The recipient must collect and maintain data that measure the performance and effectiveness of work under this award. The data must be provided to OJP in the manner (including within the timeframes) specified by OJP in the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws.

13

Requirements related to "de minimis" indirect cost rate

A recipient that is eligible under the Part 200 Uniform Requirements and other applicable law to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and that elects to use the "de minimis" indirect cost rate, must advise OJP in writing of both its eligibility and its election, and must comply with all associated requirements in the Part 200 Uniform Requirements. The "de minimis" rate may be applied only to modified total direct costs (MTDC) as defined by the Part 200 Uniform Requirements.

14

Determination of suitability to interact with participating minors

SCOPE. This condition applies to this award if it is indicated -- in the application for the award (as approved by DOJ)(or in the application for any subaward, at any tier), the DOJ funding announcement (solicitation), or an associated federal statute -- that a purpose of some or all of the activities to be carried out under the award (whether by the recipient, or a subrecipient at any tier) is to benefit a set of individuals under 18 years of age.

The recipient, and any subrecipient at any tier, must make determinations of suitability before certain individuals may interact with participating minors. This requirement applies regardless of an individual's employment status.

The details of this requirement are posted on the OJP web site at https://ojp.gov/funding/Explore/Interact-Minors.htm (Award condition: Determination of suitability required, in advance, for certain individuals who may interact with participating minors), and are incorporated by reference here.

15

Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency outside of DOJ

If the recipient is designated "high risk" by a federal grant-making agency outside of DOJ, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to OJP by email at OJP.ComplianceReporting@ojp.usdoj.gov. For purposes of this disclosure, high risk includes

any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

16

Compliance with DOJ Grants Financial Guide

References to the DOJ Grants Financial Guide are to the DOJ Grants Financial Guide as posted on the OJP website (currently, the "DOJ Grants Financial Guide" available at https://ojp.gov/financialguide/DOJ/index.htm), including any updated version that may be posted during the period of performance. The recipient agrees to comply with the DOJ Grants Financial Guide.

17

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

18

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2021)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2021, are set out at https://ojp.gov/funding/Explore/FY21AppropriationsRestrictions.htm, and are incorporated by reference here.

Should a question arise as to whether a particular use of federal funds by a recipient (or a subrecipient) would or might fall within the scope of an appropriations-law restriction, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

19

Potential imposition of additional requirements

The recipient agrees to comply with any additional requirements that may be imposed by the DOJ awarding agency (OJP or OVW, as appropriate) during the period of performance for this award, if the recipient is designated as "high-risk" for purposes of the DOJ high-risk grantee list.

20

Employment eligibility verification for hiring under the award

1. The recipient (and any subrecipient at any tier) must--

A. Ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S.C. 1324a(a)(1).

B. Notify all persons associated with the recipient (or any subrecipient) who are or will be involved in activities under this award of both--

(1) this award requirement for verification of employment eligibility, and

(2) the associated provisions in 8 U.S.C. 1324a(a)(1) that, generally speaking, make it unlawful, in the United States, to hire (or recruit for employment) certain aliens.

C. Provide training (to the extent necessary) to those persons required by this condition to be notified of the award requirement for employment eligibility verification and of the associated provisions of 8 U.S.C. 1324a(a)(1).

D. As part of the recordkeeping for the award (including pursuant to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings.

2. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

For purposes of this condition, persons "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. Employment eligibility confirmation with E-Verify

For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify (www.e-verify.gov), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including

in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

C. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

D. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

E. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (https://www.e-verify.gov/) or email E-Verify at E-Verify@dhs.gov. E-Verify employer agents can email E-Verify at E-VerifyEmployerAgent@dhs.gov.

Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

21

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

The foregoing is not intended, and shall not be understood by the agency making this award, to contravene requirements applicable to Standard Form 312 (which relates to classified information), Form 4414 (which relates to sensitive compartmented information), or any other form issued by a federal department or agency governing the nondisclosure of classified information.

1. In accepting this award, the recipient--

a. represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

b. certifies that, if it learns or is notified that it is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

2. If the recipient does or is authorized under this award to make subawards ("subgrants"), procurement contracts, or both--

a. it represents that--

(1) it has determined that no other entity that the recipient's application proposes may or will receive award funds (whether through a subaward ("subgrant"), procurement contract, or subcontract under a procurement contract) either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise currently restrict (or purport to prohibit or restrict) employees or contractors from reporting waste, fraud, or abuse as described above; and

(2) it has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

b. it certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict (or purport to prohibit or restrict), reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume (or permit resumption of) such obligations only if expressly authorized to do so by that agency.

22

Reclassification of various statutory provisions to a new Title 34 of the United States Code

On September 1, 2017, various statutory provisions previously codified elsewhere in the U.S. Code were editorially reclassified (that is, moved and renumbered) to a new Title 34, entitled "Crime Control and Law Enforcement." The reclassification encompassed a number of statutory provisions pertinent to OJP awards (that is, OJP grants and cooperative agreements), including many provisions previously codified in Title 42 of the U.S. Code.

Effective as of September 1, 2017, any reference in this award document to a statutory provision that has been reclassified to the new Title 34 of the U.S. Code is to be read as a reference to that statutory provision as reclassified to Title 34. This rule of construction specifically includes references set out in award conditions, references set out in material incorporated by reference through award conditions, and references set out in other award requirements.

23

OJP Training Guiding Principles

Any training or training materials that the recipient -- or any subrecipient ("subgrantee") at any tier -- develops or delivers with OJP award funds must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at https://ojp.gov/funding/Implement/TrainingPrinciplesForGrantees-Subgrantees.htm.

24

All subawards ("subgrants") must have specific federal authorization

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements for authorization of any subaward. This condition applies to agreements that --

for purposes of federal grants administrative requirements -- OJP considers a "subaward" (and therefore does not consider a procurement "contract").

The details of the requirement for authorization of any subaward are posted on the OJP web site at https://ojp.gov/funding/Explore/SubawardAuthorization.htm (Award condition: All subawards ("subgrants") must have specific federal authorization), and are incorporated by reference here.

25

Requirements related to System for Award Management and Universal Identifier Requirements

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov/. This includes applicable requirements regarding registration with SAM, as well as maintaining the currency of information in SAM.

The recipient also must comply with applicable restrictions on subawards ("subgrants") to first-tier subrecipients (first-tier "subgrantees"), including restrictions on subawards to entities that do not acquire and provide (to the recipient) the unique entity identifier required for SAM registration.

The details of the recipient's obligations related to SAM and to unique entity identifiers are posted on the OJP web site at https://ojp.gov/funding/Explore/SAM.htm (Award condition: System for Award Management (SAM) and Universal Identifier Requirements), and are incorporated by reference here.

This condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

26

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") 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. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or 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. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

Should any question arise as to whether a particular use of federal funds by a recipient (or subrecipient) would or might fall within the scope of these prohibitions, the recipient is to contact OJP for guidance, and may not proceed without the express prior written approval of OJP.

27

Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed $250,000

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements to obtain specific advance approval to use a noncompetitive approach in any procurement contract that would exceed the Simplified Acquisition Threshold (currently, $250,000). This condition applies to agreements that -- for purposes of federal grants administrative requirements -- OJP considers a procurement "contract" (and therefore does not consider a subaward).

The details of the requirement for advance approval to use a noncompetitive approach in a procurement contract under an OJP award are posted on the OJP web site at https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm (Award condition: Specific post-award approval required to use a noncompetitive approach in a procurement contract (if contract would exceed $250,000)), and are incorporated by reference here.

28

Requirements pertaining to prohibited conduct related to trafficking in persons (including reporting requirements and OJP authority to terminate award)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

The details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

29

Requirement to report potentially duplicative funding

If the recipient currently has other active awards of federal funds, or if the recipient receives any other award of federal funds during the period of performance for this award, the recipient promptly must determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award. If so, the recipient must promptly notify the DOJ awarding agency (OJP or OVW, as appropriate) in writing of the potential duplication, and, if so requested by the DOJ awarding agency, must seek a budget-modification or change-of-project-scope Grant Award Modification (GAM) to eliminate any inappropriate duplication of funding.

30

Reporting potential fraud, waste, and abuse, and similar misconduct

The recipient, and any subrecipients ("subgrantees") at any tier, must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent,

subrecipient, contractor, subcontractor, or other person has, in connection with funds under this award-- (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by--(1) online submission accessible via the OIG webpage at https://oig.justice.gov/hotline/contact-grants.htm (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).

Additional information is available from the DOJ OIG website at https://oig.justice.gov/hotline.

31

The recipient agrees that it will submit quarterly financial status reports (the SF 425 Federal Financial Report) to OJP in JustGrants, no later than the deadlines set out in the DOJ Financial Guide and the JustGrants guidance (typically 30 days after the end of each calendar quarter). Delinquent reports may lead to funds being frozen and other remedies.

32

The recipient shall submit semiannual performance reports. Performance reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov

33

The recipient agrees to submit a final report at the end of this award documenting all relevant project activities during the entire period of support under this award. This report will include detailed information about the project(s) funded, including, but not limited to, information about how the funds were actually used for each purpose area, data to support statements of progress, and data concerning individual results and outcomes of funded projects reflecting project successes and impacts. The final report is due no later than 120 days following the close of this award period or the expiration of any extension periods. This report will be submitted to the Office of Justice Programs, on-line through the Internet at https://justgrants.usdoj.gov/

34

FFATA reporting: Subawards and executive compensation

The recipient must comply with applicable requirements to report first-tier subawards ("subgrants") of $30,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients (first-tier "subgrantees") of award funds. The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the OJP web site at https://ojp.gov/funding/Explore/FFATA.htm (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here.

This condition, including its reporting requirement, does not apply to-- (1) an award of less than

$30,000, or (2) an award made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).

35

Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. Under certain circumstances, recipients of OJP awards are required to report information about such proceedings, through the federal System for Award Management (known as "SAM"), to the designated federal integrity and performance system (currently, "FAPIIS").

The details of recipient obligations regarding the required reporting (and updating) of information on certain civil, criminal, and administrative proceedings to the federal designated integrity and performance system (currently, "FAPIIS") within SAM are posted on the OJP web site at https://ojp.gov/funding/FAPIIS.htm (Award condition: Recipient Integrity and Performance Matters, including Recipient Reporting to FAPIIS), and are incorporated by reference here.

36

Limit on use of grant funds for grantees' employees' salaries

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.

37

Statement of Federal Involvement

Due to the substantial Federal involvement contemplated in completion of this project, the OVC has elected to enter into a cooperative agreement rather than a grant. This decision is based on OJP and OVC's ongoing responsibility to assist and coordinate projects that relate to the funded activities. OJP and OVC will provide input and re-direction to the project, as needed, in consultation with the recipient, and will actively monitor the project by methods including, but not limited to, ongoing contact with the recipient. In meeting programmatic responsibilities, OJP, OVC, and the recipient will be guided by the following principles: responsibility for the day-to-day operations of this project rests with the recipient in implementation of the recipient's approved proposal, the recipient's approved budget, and the terms and conditions specified in this award. Responsibility for general oversight and redirection of the project, if necessary, rests with OVC. In addition to its programmatic reporting requirements, the recipient agrees to

provide necessary information as requested by OJP and OVC. Information requests may include, but are not limited to, specific submissions related to: performance, including measurement of project outputs/outcomes; meeting performance specifications; developmental decision points; changes in project scope or personnel; budget modifications; and/or coordination of related projects.

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Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds $20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

1) name of event;

2) event dates;

3) location of event;

4) number of federal attendees;

5) number of non-federal attendees;

6) costs of event space, including rooms for break-out sessions;

7) costs of audio visual services;

8) other equipment costs (e.g., computer fees, telephone fees);

9) costs of printing and distribution;

10) costs of meals provided during the event;

11) costs of refreshments provided during the event;

12) costs of event planner;

13) costs of event facilitators; and

14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

1) meals and incidental expenses (M&IE portion of per diem);

2) lodging;

3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,

4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that

portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the DOJ Financial Guide Conference Cost Chapter.

39

Justification of consultant rate

Approval of this award does not indicate approval of any consultant rate in excess of $650 per day. A detailed justification must be submitted to and approved by the OJP program office prior to obligation or expenditure of such funds.

40

TTA Awards: Tracking and Reporting Data

The recipient understands and agrees to track and report data on all training and technical assistance activities and deliverables using the guidance, format, or tool provided by the Program Office or OJP.

41

Recipient understands and agrees not to engage in activities constituting organizational conflicts of interest, such as bidding on specifications it guided as part of the provision of training and technical assistance under this award. Actions that may give rise to organizational conflicts of interest under awards are described in the Procurement Standards in 2 C.F.R. Part 200 (the Part 200 Uniform Requirements) and the DOJ Grants Financial Guide. Prior approval from the grant manager is required for any work with an organization or entity that would receive training or technical assistance under this award.

42

The recipient agrees to submit to OJP for review and approval any product (e.g., curricula, training materials, publications, reports, videos, or any other written, web-based, or audio-visual, or other materials) that will be developed and published under this award, 60 days before its intended publication. The recipient agrees to correct a product in response to comments generated through the OJP peer review process, the internal Department of Justice review process, or as otherwise requested by OJP. Any products developed under this award shall contain the following statement: "This _____ was produced by _____ under [add grant number], awarded by the [add Awarding Program Office, e.g., Office for Victims of Crime], Office of Justice Programs, U.S. Department of Justice. The opinions, findings, and conclusions or recommendations expressed in this _____ are those of the contributors and do not necessarily represent the official position or policies of the U.S. Department of Justice." The OJP grant manager will determine whether minor deliverables, such as webinars, one-page flyers and discrete web pages, require review or prior approval by OJP.

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A. Exceptions regarding Part 200 Uniform Requirements / For-Profit Organizations

Notwithstanding any provision to the contrary in the other terms and conditions of this award,

including in the initial condition regarding "Applicability of Part 200 Uniform Requirements" --

(1) The "Cost Principles" of the Part 200 Uniform Requirements set out in Subpart E of 2 C.F.R. Part 200 do not apply to this award, other than the policies set out in 2 C.F.R. 200.400(a)-(c); and

(2) the "Audit Requirements" of the Part 200 Uniform Requirements as set out in Subpart F of 2 C.F.R. Part 200 do not apply to this award, other than as set out in the conditions of this award entitled "Audits of recipient for-profit organization" and "Submission of audit reports and corrective action plans."

With respect to this award, the recipient for-profit organization instead must follow --

(1) the contract cost principles set out in subpart 31.2 of the Federal Acquisition Regulation (the "F.A.R."), and

(2) the audit requirements set out in the conditions of this award entitled "Audits of recipient for-profit organization" and "Submission of audit reports and corrective action plans."

B. Procurement Standards of the Part 200 Uniform Requirements apply

Notwithstanding any provision to the contrary that may appear in the other terms and conditions of this award (or in the DOJ Grants Financial Guide), the recipient for-profit organization must follow the "Procurement Standards" set out in Subpart D of the Part 200 Uniform Requirements with respect to any procurements under this award.

In the event that an award-related question arises regarding the scope or applicability of the provisions in the Procurement Standards of the Part 200 Uniform Requirements related to avoidance of any "conflict of interest," the recipient for-profit organization is to contact OJP promptly for clarification. Absent specific prior written approval from OJP, the recipient may not involve any individual or organization that may have a real or apparent conflict of interest in the selection, award, or administration of any procurement under this award.

C. No profit or management fee

The recipient agrees that no profit or management fee will be allowed or permitted under this award, including in the event that this award is terminated.

D. Restriction on competition for (or acceptance of) certain federal awards

Absent prior written approval from OJP, for one (1) calendar year after the end date of the period of performance for this award, the recipient may not compete for, or accept, any federal procurement award or any federal assistance award that may have resulted or been derived from this award. This limitation is not intended to bar the recipient from applying for, or accepting, a supplement to this award.

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Audits of recipient for-profit organization

A. Audits based on annual expenditures under federal awards; availability of records

The recipient must have an audit performed for each recipient fiscal year during which the recipient expends $750,000 or more in federal awards, as determined under the rules and principles set out at 2 C.F.R. 200.501 and 200.502. This audit must be performed in accordance with generally accepted government auditing standards (GAGAS) as defined at 2 C.F.R. 200.50. The auditor (including the auditor's principals, officers, employees, and agents) must be organizationally, personally, and otherwise fully independent of the recipient organization; of the recipient's principals, officers, employees, and agents; and of shareholders with substantial interests in the recipient organization.

For any fiscal year of the recipient organization during which the recipient expends less than $750,000 in federal awards, no audit is required by this award condition; however, records must be available for review or audit by appropriate officials of DOJ and OJP, and/or the Government Accountability Office (GAO).

B. Scope of Audits and Audit Reports

Absent specific advance written approval from OJP, any audit conducted to satisfy this award condition must, at a minimum, include--

(1) audit of the financial statement(s) prepared by the recipient for the federal program;

(2) evaluation of internal controls over the federal program, including tests of internal controls that are consistent with the tests that would be performed under the rules and principles set out in 2 C.F.R. 200.514(c) for a single audit under Subpart F of 2 C.F.R. Part 200 if the federal program were a major program as defined in 2 C.F.R. 200.65;

(3) performance of procedures to determine whether the recipient has complied with federal statutes, regulations, and the terms and conditions of federal awards that could have a direct and material effect on the federal program;

(4) follow-up on prior audit findings, performance of procedures to assess the reasonableness of the summary schedule of prior audit findings prepared by the recipient, and reporting of any conclusion that the summary schedule materially misrepresents the status of any prior audit finding; and

(5) preparation of a report on any audit findings, consistent with the rules and principles set out at 2 C.F.R. 200.515 (Audit Reporting) and 200.516 (Audit Findings). In lieu of stating that the audit was conducted in accordance with subpart F of 2 C.F.R. Part 200, however, the auditor's report(s) must state that the audit was conducted in accordance with the requirements of this award condition, entitled "Audits of recipient for-profit organization."

For purposes of these "scope of audit" requirements--

"Financial statement(s) prepared by the recipient for the federal program" includes the items set out at 2 C.F.R. 200.507(b)(2).

The "summary schedule of prior audit findings" prepared by the recipient must follow the rules and principles set out at 2 C.F.R. 200.511(2).

Any request for advance approval by OJP of an audit that deviates from these requirements as to "scope of audit" must be-- (1) submitted in writing to OJP, and (2) must specifically describe and justify the proposed deviation(s). Requests for approval to deviate will be considered by OJP's OCFO and OJP's Office of Audit, Assessment, and Management, as well as by the appropriate OJP program office.

45

Submission of Audit Reports and Corrective Action Plans

For each audit required by the award condition entitled "Audits of recipient for-profit organization," the recipient must submit to OJP, no later than nine (9) months after the close of each recipient fiscal year during the period of performance for this award, the audit report(s) and any associated auditor letter(s) to the recipient's management. In addition, if a required audit contains or results in any findings or any recommendations, the recipient must submit, together with the audit report(s), a corrective action plan that satisfies the requirements set out at 2 C.F.R. 200.511(c).

The recipient must mail one copy of each audit report required by this condition and any associated corrective action plan to:

U.S. Department of Justice
Office of Justice Programs
Office of the Chief Financial Officer
ATTN: Control Desk
810 Seventh Street, N.W.
Washington, DC 20531

Alternative methods for submission of audit reports by recipient for-profit organizations may be used only as expressly permitted for such organizations by the DOJ Grants Financial Guide posted on the OJP website (currently, the "DOJ Grants Financial Guide").

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The recipient's budget is pending review and clearance by OJP. Prior to budget clearance, unless prohibited by another condition of this award, the recipient may obligate and expend funds for budgeted recipient personnel, fringe benefit, and related operational costs and OVC-mandated travel costs, only, up to $25,000 to participate in OJP-required trainings, advertise for new positions, maintain current staffing, plan activities with project staff, and provide victim services. All obligations and expenditures incurred prior to budget clearance are incurred at the sole risk of the recipient, and must be in compliance with applicable 2 C.F.R. part 200 cost principles and DOJ Financial Guide provisions. The recipient may not obligate or expend additional funds, or draw down funds, except pursuant to an approved Award Condition Modification, or until OCFO has approved the budget and budget narrative, and has issued an Award Condition Modification removing this award condition. If any other condition on this award prohibits obligation, expenditure, or drawdown of funds to a greater extent than this condition, then that other condition controls.

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The recipient may not obligate, expend, or draw down any award funds for indirect costs, unless and until either -- (1) the recipient submits to OJP a current, federally-approved indirect cost rate agreement, or (2) the recipient determines that it is eligible under the Part 200 Uniform Requirements to use the "de minimis" indirect cost rate described in 2 C.F.R. 200.414(f), and advises OJP in writing of both its eligibility and its election.

The financial review of the budget for this award is pending. If the OJP Office of the Chief Financial Officer (OCFO) determines as part of its financial review that the recipient already has submitted the documentation concerning indirect costs described above, this condition will

be released through a Grant Award Condition Modification (ACM) upon completion of the OCFO final budget review.

If the OJP OCFO instead determines as part of its financial review that the recipient has not yet submitted the required documentation concerning indirect costs, this condition will not be released until OJP (including its OCFO) receives and reviews a satisfactory submission.

I have read and understand the information presented in this section of the Federal Award Instrument.

Award Acceptance

Declaration and Certification to the U.S. Department of Justice as to Acceptance

By checking the declaration and certification box below, I--

A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.

B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.

C. Accept this award on behalf of the applicant.

D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Acting Assistant Attorney General	Amy Solomon	10/24/21 11:58 PM

Authorized Representative

Entity Acceptance

Title of Authorized Entity Official

General Counsel and Secretary

Signed Date And Time

— —

Agency Approval

Title of Approving Official	Name of Approving Official	Signed Date And Time
Acting Assistant Attorney General	Amy Solomon	10/24/21 11:58 PM

Authorized Representative

Entity Acceptance

Title of Authorized Entity Official

General Counsel and Secretary

Signed Date And Time

— —

EXHIBIT 6

From: Office of Justice Programs (OJP)
To: Mona Sahaf; Chloe Aquart; Daniela Gilbert; Paula Gonzalez; Adair Iacono; Celine Quashie
Subject: Notice of Termination
Date: Friday, April 4, 2025 3:12:08 PM
Attachments: image001.png

VIA: Electronic Mail

NOTICE OF TERMINATION

Date: April 4, 2025

Award Recipient Name: Vera Institute of Justice, Inc.

Subject: Termination of Awards

Based on a careful review, the awards listed immediately below are hereby terminated pursuant to 2 C.F.R. § 200.340(a)(4):

Award Number
- 15PBJA-23-GK-05375-SCAX
- 15PBJA-24-GK-02981-JAGP
- 15PBJA-23-GK-05353-MUMU
- 15POVC-21-GK-01096-NONF
- 15POVC-21-GK-03261-HT

As provided, respectively, in the awards themselves, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by the Department of Justice in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements"), apply to these awards. Specifically, the award documents provide notice of the applicability of the termination provisions in § 200.340.

These awards are being terminated because they "no longer effectuate[] the program goals or agency priorities." 2 C.F.R. § 200.340(a)(4). The Department has changed its priorities with respect to discretionary grant funding to focus on, among other things, more directly supporting certain law enforcement operations, combatting violent crime, protecting American children, and supporting American victims of trafficking and sexual assault, and better coordinating law enforcement efforts at all levels of government. These awards demonstrate that they no longer effectuate Department priorities.

Consistent with this notice of termination, the use of award funds will not be allowed for obligations incurred, or expenditures made, after receipt of this notice.

Effective date: April 4, 2025

Portion of the Federal award to be terminated: All unobligated balances remaining.

Right to Appeal: Consistent with 2 C.F.R. § 200.342, you may appeal this termination in writing within 30 business days of the date of this notice. Unless the Assistant Attorney General for the Office of Justice Programs grants a waiver, an untimely appeal request may result in denial of the appeal. Any written appeal must be submitted by email to OJP.Appeals@usdoj.gov, addressed to the Assistant Attorney General for the Office of Justice Programs. In the subject line of the email, the name of the award recipient appealing the decision, the award number, and the words "Termination Appeal" must be specified, and the email message itself must contain the following:

1. A copy of the written notice of termination;
2. The date on which the written notice of termination was received;
3. A brief statement of the argument that forms the basis of the appeal, and any disputed factual, legal or other issues;
4. The amount of disallowed costs in dispute, if any;
5. Any other relevant materials.

Closeout & Continuing Responsibilities: Please note the following continuing responsibilities related to closeout and other obligations in 2 C.F.R. § 200.340(d): "When the Federal award is terminated in part or its entirety, the Federal agency or pass-through entity and recipient or subrecipient remain responsible for compliance with the requirements in §§ 200.344 [("Closeout")] and 200.345 [("Post-closeout adjustments and continuing responsibilities.")]." Such responsibilities include, but are not limited to, your obligation to "promptly refund any unobligated funds" that have been paid out but "are not authorized to be retained." 2 C.F.R. § 200.344(g). Failure to do so may result in the filing of a report documenting "material failure to comply with the terms and conditions of" this award on SAM.gov and taking other appropriate enforcement actions, which could affect eligibility for future grants. *Id.* § 200.344(i). Finally, duties regarding retention of grant records for at least three years after the submission of a final financial report are hereby noted. *See id.* § 200.334.

Please acknowledge receipt of this Termination Notice
(End of Notice)