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The COPS Office Management of the Methamphetamine Initiative

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Final Report

About This Report

The Office of Justice Programs, Office of Audit, Assessment, and Management (OAAM), Program Assessment Division prepared this report. For questions regarding the content or distribution of this report, please contact Maureen Henneberg, director of OAAM, at (202) 616-3282.

Acronyms

CA DOJ	California Department of Justice
COPS Office	Office of Community Oriented Policing Services
DEA	Drug Enforcement Administration
DOJ	Department of Justice
EPIC	El Paso Intelligence Center
GAO	Government Accountability Office
GPRA	Government Performance and Results Act
HCF	Hawaii Community Foundation
JRSA	Justice Research and Statistics Association
Meth	Methamphetamine
OAAM	Office of Audit, Assessment, and Management
OIG	Office of Inspector General
OJP	Office of Justice Programs



The COPS Office Management of the Methamphetamine Initiative

Preface

During the writing of this report, the 112th Congress approved a ban on earmarks for FY 2011 and FY 2012. Therefore, the FY 2011 budget that was passed on April 14, 2011 does not contain funding for the Methamphetamine Initiative program, nor does the President's budget for FY 2012.

The ban on earmarks affected some of the findings that OAAM generated in this report. Specifically, OAAM recognizes that Recommendations 1 - 4 cannot be acted upon at this time because they pertain to the issues of the Methamphetamine Initiative as an earmarked program. However, if Methamphetamine Initiative earmarks resume in the future, OAAM will look to the COPS Office to respond to these recommendations.

The remainder of OAAM's findings relate to the oversight of open and active Methamphetamine Initiative awards. OAAM's Recommendations 5 - 8 focus on improving the COPS Office's ongoing grant management and internal oversight processes. Therefore, OAAM expects the COPS Office to respond to Recommendations 5 - 8, as they pertain to open and active grants.

It should be noted that the report narrative was not changed to reflect the earmark ban.

Introduction

The mission of the Office of Audit, Assessment, and Management (OAAM) is to continuously improve the administration of grants and performance of grant programs and to ensure compliance and proper internal controls through oversight and review of critical financial processes, grant management activities, and grant



programs. OAAM's Program Assessment Division provides the Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS Office) with targeted, timely, and practical feedback on program initiatives and operations to identify successes, weaknesses, and opportunities to improve performance.

The purpose of this assessment is to provide COPS Office leadership with a performance analysis of its Methamphetamine (Meth) Initiative grant program. The assessment's objective was to analyze COPS Office Meth Initiative grantee and grant program performance. From July 2009 through May 2010, OAAM reviewed the history of the Meth Initiative; identified and analyzed program performance measures and performance data; selected a sample of grantees from which to identify program accomplishments, promising practices, and areas for program improvement; and reviewed the COPS Office's implementation of specific recommendations from the Department of Justice (DOJ) Office of the Inspector General (OIG) as they related to performance.¹ We examined the COPS Office's implementation of select OIG recommendations to assess its overall performance measurement activities.

Overview

Background

Production, sale, and use of meth remains a serious problem in the U.S., despite government efforts to reduce its damaging impact. According to the DOJ 2010 National Drug Threat Assessment, in 2009, meth availability increased in the U.S., the price of meth dropped, and the purity increased. In 2009, 6,568 kilograms of meth were seized, up from 6,318 kilograms in 2008. While Mexico is the primary source for the meth that is consumed in the U.S., domestic production continued to increase, with 3,931 meth laboratory seizures in 2008 and 4,571 seizures in 2009. The increase in domestic production has continued despite federal laws that restrict the retail sale of pseudoephedrine, a pre-cursor chemical needed for meth production. Funding for both meth prevention and enforcement efforts remains a critical need for many states.

¹ OIG Audit Report 06-16, "The Office of Community Oriented Policing Services Methamphetamine Initiative," March 2006.



In 1998, Congress established the Meth Initiative under the Violent Crime Control and Law Enforcement Act of 1994, and assigned administrative responsibility for the initiative to the COPS Office. Congress established the Meth Initiative to combat meth production, distribution, and use through funding of enforcement, training, and prevention activities nationwide. Funding has been historically directed at state and local law enforcement agencies as well as the Drug Enforcement Administration (DEA), which receives funding to provide training to state and local law enforcement professionals on the proper removal and disposal of hazardous materials from clandestine meth labs. Congress has appropriated approximately \$619 million for the Meth Initiative since the inception of the program in FY 1998 through the end of FY 2009.

The COPS Office oversees the administration of the Meth Initiative and the dissemination of the funds, and facilitates training and technical assistance for grantees. The COPS Office encourages grantees to implement their meth programs using the COPS Office community policing approach, a philosophy that promotes addressing public safety issues through partnerships and problem-solving techniques, to bring about a reduction in meth production, distribution, and use.

The goals and objectives of the program have remained fairly consistent throughout the program's existence. The COPS Office outlines the goals of the program each year in its annual application guide. The following goals are listed in the FY 2009 application guide:

- Establishing or enhancing existing comprehensive meth reduction efforts through coordinated prevention, intervention/treatment and enforcement activities;
- Increasing the use of community policing strategies (including problem solving, community partnership, and organizational transformation) to reduce the manufacture, distribution and use of meth; and



- Increasing the coordination, information sharing, and collaboration among local, state and general public and/or private entities involved in prevention, intervention, treatment, and enforcement activities related to meth.

Funding History

Meth Initiative funding is appropriated annually by Congress and channeled primarily into congressionally earmarked grants for state and local law enforcement agencies, district attorneys and courts, advocacy and community organizations, health service providers, tribal agencies, public and private universities, and state and local governments.² The major exception to this funding pattern occurred in FY 2007 with the congressional passage of a continuing resolution, resulting in all FY 2007 Meth Initiative funding being managed as discretionary. Congress also appropriates funding under the Meth Initiative for the DEA. This funding is passed through the COPS Office to the DEA via reimbursable agreements or direct transfers.³

Of the approximately \$619 million Congress has appropriated in funds for the Meth Initiative, the COPS Office administered \$431 million to state and local grantees. The COPS Office also transferred approximately \$188 million to the DEA for training on meth lab response. Since the inception of the Meth Initiative program through FY 2009, the COPS Office has issued 750 grants to a total of 430 grantees. Of those grantees, 124 (29%) are repeat recipients of Meth Funding. Of the 750 grants that were awarded, 444 (59%) went to applicants who had received previous Meth Initiative awards. In other words, approximately 30 percent of grantees have received over 50 percent of Meth Initiative awards since the program's inception.

² In FY 1998, FY 2002, and FY 2003 the Meth Initiative had small amounts of discretionary grant funding available.

³ In FY 2010, the appropriations bill directed the COPS Office to pass the funding to DEA through a direct transfer instead of through a reimbursable agreement.



Earmarked Programs

Earmarked programs present management challenges to federal agencies on several levels. First, earmarked programs do not necessarily fit into the strategic direction of the administering agency. Second, agencies have limited control over who receives funding, whether the recipients can carry out the mission of the agency, and what amounts of funding are received. This can compound the first challenge if the organization selected by Congress to receive earmarked funds is not one that can easily carry out the mission of the administering agency. Third, organizations receive earmarked funds whether or not they request the funds, are qualified to administer the funds, and often in spite of the fact that they are not the most appropriate entity to carry out the goals of the initiative. And finally, the unpredictable nature of earmark programs makes it difficult to engage in strategic planning on the part of the administering agency. The COPS Office has administered the Meth Initiative despite these management challenges, incorporating them into its overall management of grant programs.

Results of this Assessment

While there are certain challenges inherent to an earmarked program, during our assessment of the Meth Initiative program, we uncovered issues that we believe can be successfully addressed by the COPS Office to improve the Meth program. The issues fall into two broad categories: (1) managing external communications with the DEA and with Congress and (2) improving internal oversight processes. We determined that the COPS Office needs to improve its communication with the DEA and provide feedback to Congress on the relationship of earmarks to actual Meth incidents throughout the country. In addition, we identified concerns with the COPS Office's use of multiple grant extensions, the accuracy of the performance measures for gauging program performance, and the COPS Office's use of a progress report format that does not capture information about activities critical to the goals of the Meth Initiative.

By managing external communication and internal oversight, we believe many of the challenges presented by this earmarked



program can be minimized. We also recognize that some of the strategies recommended for this program would not be necessary if the COPS Office had direct control of the funding stream as it does in its other programs. However, instituting the recommendations in this report could improve the COPS Office's oversight of Meth funding and may generate better information about the successes of the program.

External Communications

Award Process

As stated previously, agencies identified by Congress to administer earmarked programs have limited control over the grantees selected or the funding amounts. The COPS Office is no exception. In this case, however, we identified ways in which the COPS Office could improve the award process by increasing external communications. Our assessment identified problems with communication between the COPS Office and the DEA, which precluded meaningful dialogue about the appropriate awarding of grants to areas with the highest need, as well as the provision of feedback to Congress on its selection of grantees. We believe that, if awards are to be made appropriately, that is, to entities with the greatest problem and need, then communication lines must be opened between the COPS Office and the DEA to help identify appropriate awardees, and with Congress to communicate considerations for future Meth earmarks.

In 2006, the OIG audited the Meth Initiative and found that there was little to no correlation between the number of meth incidents in a state and the amount of Meth Initiative funds that same state received. In its report, the OIG recommended that the COPS Office "review all grant applications from earmarked entities, consult with the DEA, and, as necessary, coordinate with Congress when grant applications do not appear to be warranted or are not consistent with the intent of the Meth Initiative." Although the OIG has since closed its recommendation based on action from the COPS Office, current data suggests that the COPS Office has not been effectively consulting with the DEA, and, as such, has not been able to ensure that funds are awarded to states with the highest incidence of meth problems.

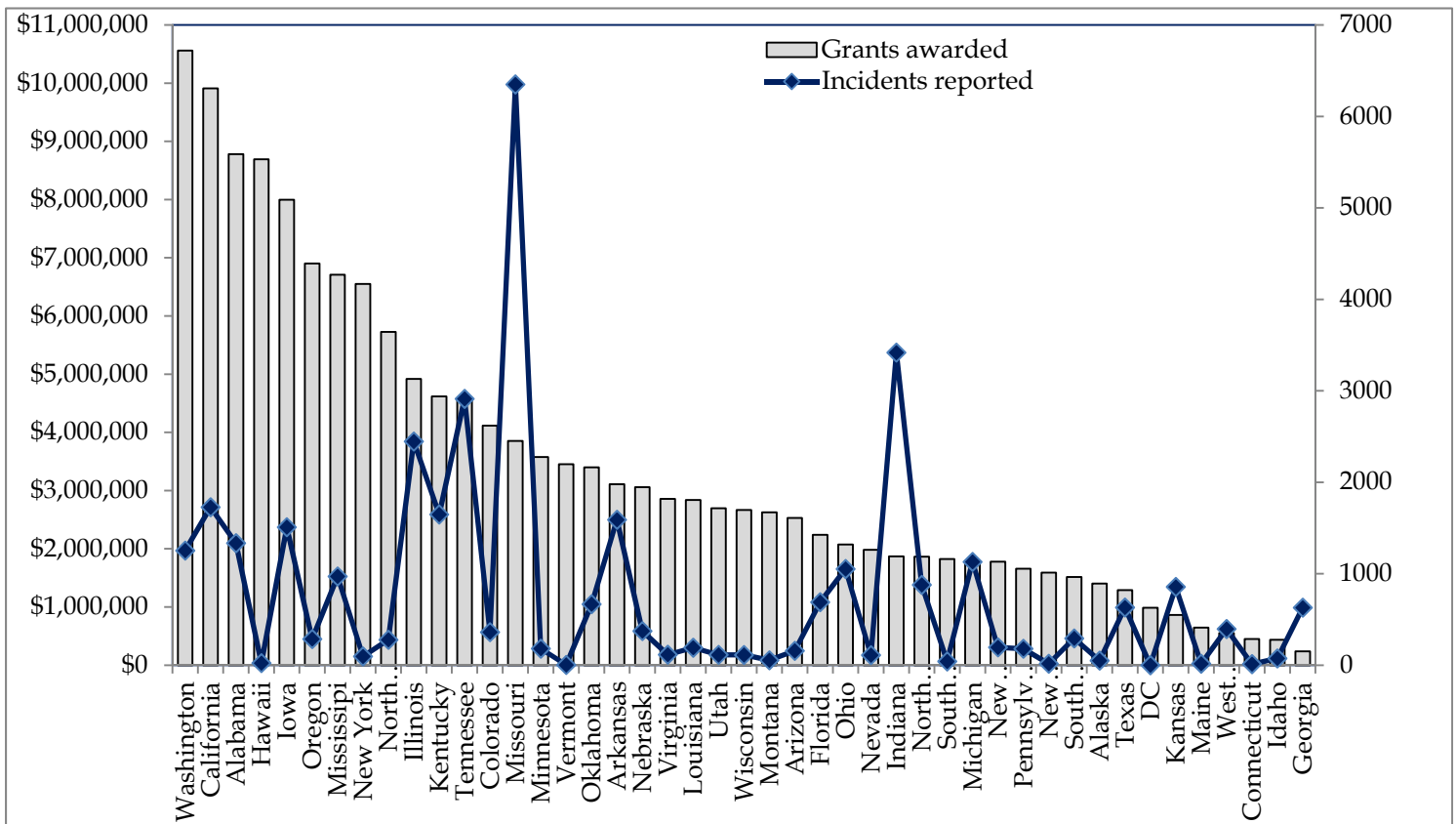


The OIG compared state meth incident rates as reported by the DEA's El Paso Intelligence Center (EPIC) against Meth Initiative grant funding for FY 1998 through FY 2004. We conducted the same analysis for FY 2005 through FY 2008 and found similar outcomes as with the OIG analysis. As such, there continues to be a discrepancy between meth incidents and grants awarded through the Meth Initiative. As Figure 1 demonstrates, several states continued to receive low amounts of Meth Initiative funds despite having high numbers of meth incidents.⁴

⁴ Figure 1 does not show all 51 states for ease of reading. The following states were removed as they received no funding and had the lowest incidence rates: DE, MA, MD, NJ, RI and WY.



Figure 1. Meth Initiative funds awarded and reported laboratory seizures, FYs 2005-2008



* Source: EPIC FY 2005 - FY 2008 lab seizure data (as of September 2010), and COPS Office Meth Initiative funding reports.



As shown in table 1 below, Missouri reported the highest number of meth incidents from 2005 through 2008 as reported by EPIC. However, Missouri is ranked fourteenth in the amount of grant funds awarded under the Meth Initiative. Conversely, Washington, which ranked first in the amount of grant funds awarded, is tenth in terms of meth incidents reported. Missouri reported more than five times the amount of meth-related incidents as Washington, but Washington received nearly three times the amount of funding. The state of Indiana had the second highest number of meth incidents, but was twenty-ninth in terms of Meth Initiative fund levels. Similarly, California received the second largest amount of funds, but reported half the amount of meth incidents that Indiana reported.

Table 1. Top 10 states with EPIC-reported methamphetamine incidents, 2005-2008

State	Incidents reported to EPIC	Funding ranking (out of 51)	Meth Initiative grant funds awarded
Missouri	6,350	14	\$3,852,663
Indiana	3,418	29	\$1,868,699
Tennessee	2,912	12	\$4,565,932
Illinois	2,446	10	\$4,919,727
California	1,727	2	\$9,909,867
Kentucky	1,648	11	\$4,617,538
Arkansas	1,590	18	\$3,109,753
Iowa	1,509	5	\$7,996,870
Alabama	1,334	3	\$8,781,382
Washington	1,253	1	\$10,559,189

* Source: EPIC FY 2005 – FY 2008 lab seizure data (as of September 2010), and COPS Office Meth Initiative funding reports.



Conversely, table 2 lists the top 10 funded states for 2005 through 2008, along with those states' meth incident rankings. Comparing table 1 against table 2, we note that New York received the eighth highest amount of funding, almost double what Missouri received. However, Missouri reported 66 times more meth incidents from 2005 through 2008 than New York reported.

Table 2. Top 10 Meth Initiative-funded states, 2005 - 2008

State	Meth Initiative grant funds awarded	Methamphetamine incidence ranking (out of 51)	Methamphetamine incidents reported to EPIC
Washington	\$10,559,189	10	1,253
California	\$9,909,867	5	1,727
Alabama	\$8,781,382	9	1,334
Hawaii	\$8,693,134	41	23
Iowa	\$7,996,870	8	1,509
Oregon	\$6,901,047	24	286
Mississippi	\$6,709,706	13	971
New York	\$6,551,067	35	96
North Dakota	\$5,726,582	25	278
Illinois	\$4,919,727	4	2,446

* Source: EPIC FY 2005 - FY 2008 lab seizure data (as of September 2010), and COPS Office Meth Initiative funding reports.

While the OIG acknowledged that the COPS Office has little control over the assignment of earmarks for the Meth Initiative, it concluded that there were certain actions that the COPS Office could take to try to address this imbalance. The OIG instructed the COPS Office to institute a more rigorous analysis of earmarks to determine the appropriateness of the award, including consulting



with the DEA on whether the funding of the grantee is warranted. The OIG pointed out that congressional guidance issued since 2002 has stated that “Within the funds provided, the COPS program office, in consultation with DEA, is directed to review the following projects, to provide funding consistent with law and congressional intent, and to report to the Appropriations Committees regarding the disbursement of these funds.”⁵

The OIG requested that the COPS Office provide them with documentation showing that it had consulted with the DEA on the Meth Initiative earmarks. The COPS Office responded by providing an e-mail sent to the DEA on September 20, 2006, containing a list of earmarked grantees. In the e-mail, a COPS Office official asked the DEA to review the list of earmarked grantees and send any feedback or concerns to the COPS Office. According to COPS Office officials, DEA personnel stated via telephone that the agency had no feedback on the list of grantees.

When asked about its current consultation with the DEA on the earmarks, COPS Office officials stated that the office does not share applications with the DEA for review, but that it continues to provide a list of proposed grantees, including the award amount. The DEA may review the list and consult internally with field offices to determine if there are any proposed grantees with “unresolved issues.” COPS Office officials further elaborated that, “If DEA identifies a problem in awarding Meth funds to any specific agency, they may choose to notify the COPS Office. The COPS Office, in consultation with DEA, will then proceed to address the problem prior to awarding grant funds.” To date, the consultation process with the DEA has never identified any problems or generated any change to proposed awards.

The Meth Initiative congressional appropriation language also states that Meth Initiative funds will be used to “combat methamphetamine production and trafficking and to enhance policing initiatives in drug ‘hot spots.’ ”⁶ When asked, COPS

⁵ House Appropriations Committee Print Consolidated Appropriations Act, 2008 (H.R. 2764; Public Law 110-161) Division B – Commerce, Justice, Science, and Related Agencies Appropriations Act, 2008

⁶ H.R. 2670 Appropriations Act, 2000



Office officials explained that since the term “hot spots” was coined by Congress for the earmarked funds, the COPS Office has not sought to define it further. By leaving the term “hot spots” undefined, we believe that the COPS Office is missing an opportunity to use a standard set of criteria to collect and compare data across jurisdictions, which may reveal evidence about those jurisdictions with the most serious meth problems and most serious need for funding. Therefore, we believe that a lack of definition or understanding of the term “hot spot” may impede the COPS Office’s overall effectiveness in fulfilling congressional intent, including collaborating with the DEA on whether the proposed grantees have a demonstrated need.

While we recognize that the challenges outlined above stem from the earmark process, we also believe that the following steps could help alleviate some of those challenges. The COPS Office should put a strategic plan in place to guide the Meth Initiative and to better direct funds to areas in need. We also propose that the COPS Office define the meaning of the term “hot spot” so that it is better able to collect data and compare indicators of meth problems across jurisdictions to make more informed decisions about which jurisdictions should receive funding. The COPS Office could use criteria from its FY 2007 Meth Initiative discretionary solicitation, such as lab seizures recorded by EPIC; drug-related arrests recorded by the Federal Bureau of Investigation’s Uniform Crime Reports (UCR); and treatment admissions recorded by the Department of Health and Human Services Treatment Episode Data Sets (TEDS), to better identify jurisdictions in need of meth funding. The data could be presented to Congress, as the OIG originally recommended, and used to select organizations to receive earmarks under the Meth Initiative.

Based on the limited interaction between the COPS Office and the DEA, we propose that the COPS Office institute a more formalized communication process with the DEA. The COPS Office should provide the DEA with additional information on potential grantees, including the grantee location, project location (if different from grantee location), and proposed copy of the project abstract. We feel that the increased collaboration with the DEA, along with a definition of the term “hot spot,” could assist the COPS Office in



ensuring that those entities receiving funds are indeed those with the greatest need.

Finally, while the COPS Office has little control over the entities that have been identified to receive Meth Initiative funds, we feel that the COPS Office has the ability to perform its own trend analysis on the grant awards, similar to the type of analysis that both the OIG and OAAM conducted. Doing so will generate data for informed decision-making by the COPS Office and Congress, regarding funding appropriations and areas in need.

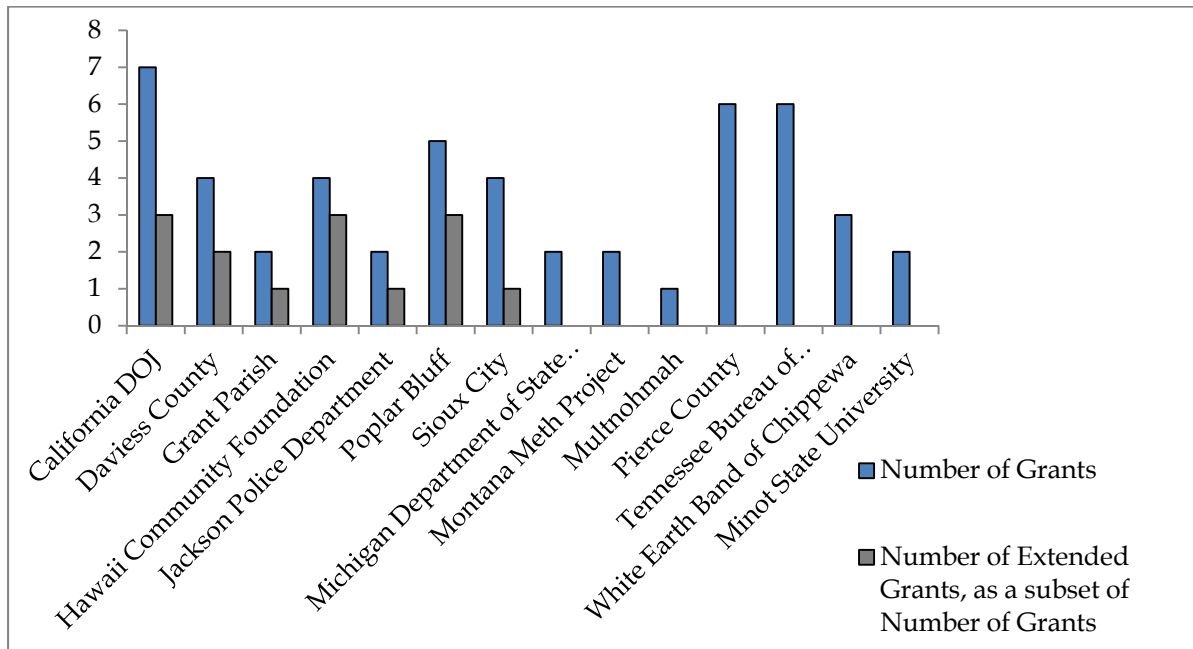
Internal Management Processes

Grant Extensions

We identified the COPS Office's use of grant extensions as a potential problem in its administration of the Meth Initiative. As part of our assessment, we selected a sample of grantees to review from the COPS Office Meth Initiative grantee universe. We elected to pull our sample from grantees with open grants that still had unexpended funds. We drew our sample from a total of 50 grantees with 204 grants that were open with a balance of funds. Our sample consisted of 14 grantees with a total of 80 grants. During our analysis, we determined that the COPS Office permitted 7 (50%) of the grantees in our sample to receive no-cost extensions, even when the grantees had overlapping, concurrent Meth Initiative earmark grants (figure 2). We determined that, in the majority of cases, the overlapping grants were for the same activities. We encourage the COPS Office to examine the remainder of its Meth Initiative grantees for overlapping no-cost extensions, as the existence of any overlapping no-cost extension is an issue of concern.



Figure 2. Number of extended grants from sampled grantees, as of December 2009



* Source: Meth Initiative grantee files, received from the COPS Office in August 2009.

The practice of providing additional funding to grantees with ongoing projects makes oversight more difficult as it becomes increasingly challenging to separate deliverables and progress when program activities are merged. While the COPS Office is unable to control the assignment of funding by Congress to particular grantees, allowing grantees to extend grants up to 5 years or more without spending funds enables grantees to access multiple years of funding, even if they have not fully implemented current grant activities or produced deliverables. In addition, reoccurring and overlapping grant extensions compound program manager (and grantee) efforts to separately track activities and deliverables from multiple grants.

When asked about the no-cost extension process for their grantees, COPS Office officials stated that grantees often required additional time to implement their projects. This was due to “a variety of challenges that grantees may experience during the life of their



awards [such as] vendor issues, employee turnover, governance challenges, etc.”

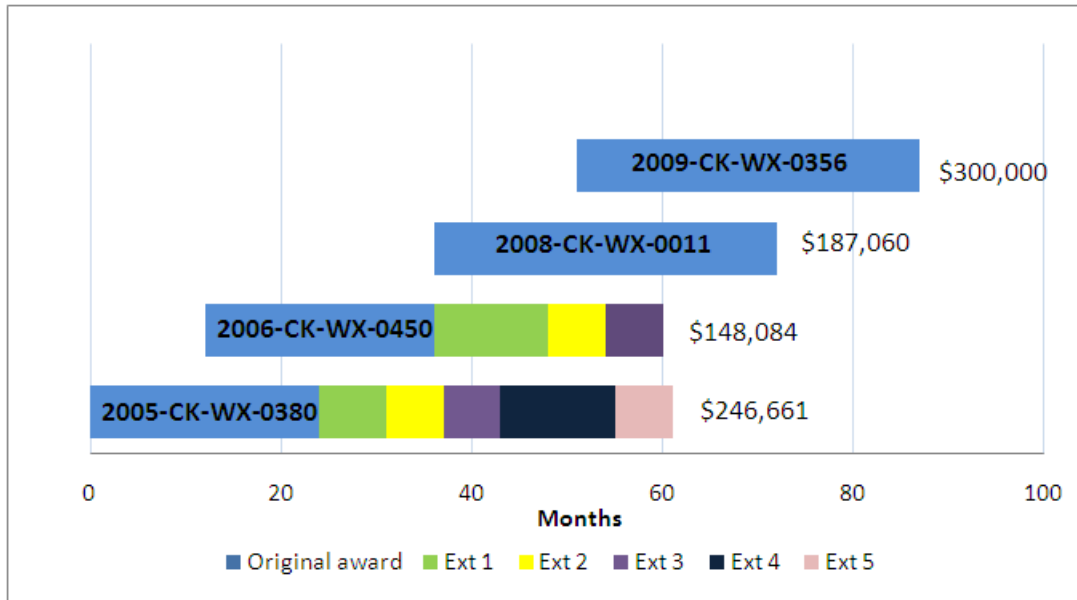
The COPS Office initiates the extension process by sending Meth Initiative grantees a hard-copy Extension Request Form in the months preceding the expiration of the grant. The form contains a section with check boxes containing the following options: (1) no extensions, (2) a 6-month extension, (3) a 12-month extension, (4) an 18-month extension, or (5) extensions longer than 18 months (the grantee can select the end date). For extension requests less than 18 months, the grantee may select from reasons on a checklist why the extension request is needed, including hiring delays, equipment delays, administrative delays, delays in implementing an applied research project, or “other” which the grantee must explain. The grantee must provide a detailed justification for extension requests of more than 18 months, including cumulative requests that total more than 18 months.

Of the 50 percent of our assessment sample that had more than one grant operating concurrently, one of these grantees, Daviess County, extended a Meth Initiative grant five times while receiving additional grants from the Meth Initiative (figure 3). All of these grant funds were for officer overtime, meth lab clean-up, and public education.

We noted that Daviess County’s first grant (2005-CK-WX-0380) was for a relatively small amount of funds (\$246,661) and a project period of 24 months. However as of December 2009, Daviess County requested a total of 36 additional months to complete the program activities. At the same time, Daviess County continued receiving grants in FY 2006, FY 2008, and FY 2009, totaling an additional \$635,144. In its proposal narratives, Daviess County affirmed that without the additional grant funds it would not be able to provide overtime salaries, purchase equipment, or provide response and clean-up services for meth labs. However in its extension requests, Daviess County repeatedly cited equipment and overtime delays as reasons why they needed extensions.



Figure 3. Daviess County grant extensions, FYs 2005-2006 and 2008-2009

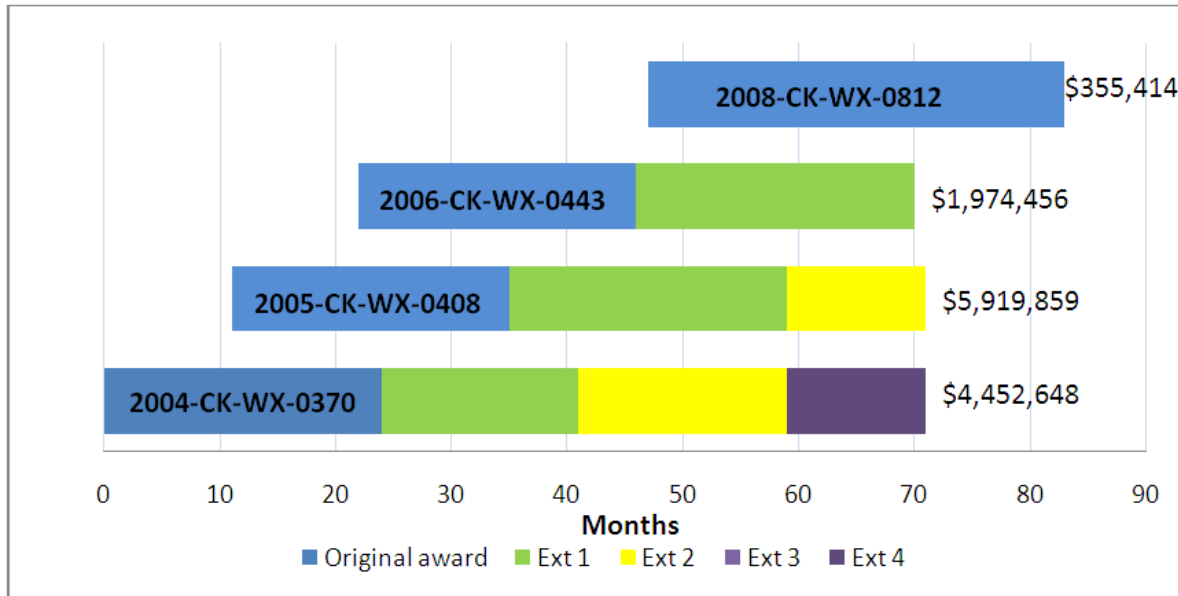


* Source: Meth Initiative grantee files, received from the COPS Office in August 2009.

Another grantee, the Hawaii Community Foundation (HCF), received grants for law enforcement and meth treatment and prevention, totaling \$12,702,377 as of December 2009, but had been equally unable to spend its funding in a timely manner (figure 4). HCF cited program, administrative, and equipment delays as reasons for extensions. HCF's first grant (2004-CK-WX-0370) took over 70 months to complete, despite the fact that it was originally awarded as a 24-month grant.



Figure 4. Hawaii Community Foundation grant extensions, FYs 2004-2006, and 2008

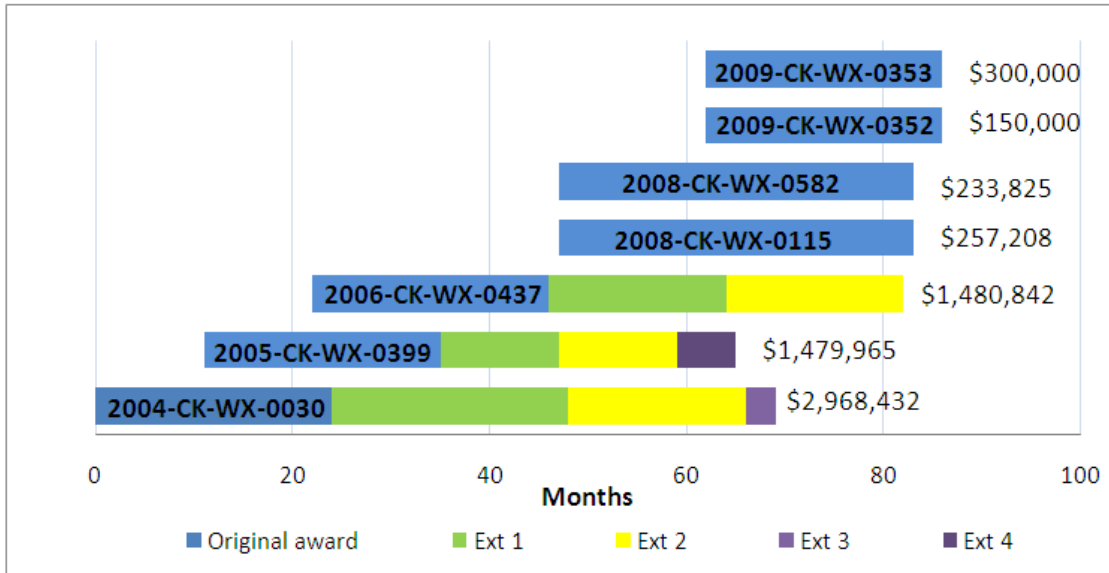


* Source: Meth Initiative grantee files, received from the COPS Office in August 2009.

Similar to HCF, as of December 2009, the California Department of Justice (CA DOJ) had also extended numerous grants totaling \$6,870,272 for its California Methamphetamine Strategy (CALMS) program (figure 5). CA DOJ cited program, administrative, hiring, and equipment delays as reasons for extensions. However, all of its proposals noted that without continued federal funding, it would not be able to continue the CALMS project.



Figure 5. California Department of Justice grant extensions, FYs 2004-2006 and 2008-2009



* Source: Meth Initiative grantee files, received from the COPS Office in August 2009.

When asked about its no-cost extension policy, COPS Office officials stated that if justified, the COPS Office seeks to accommodate reasonable requests for no-cost time extensions to fully implement the COPS grant. For an extension request to be approved, the grantee must demonstrate progress made towards its project goals and that the demonstration of such progress becomes the determining factor in granting an extension, rather than the number of extensions approved per project. Although the COPS Office maintains that a grantee must demonstrate progress to receive a no-cost extension, the Extension Request Form does not contain a section for documenting progress to date.

In contrast, the other DOJ grant-making components have a no-cost extension policy, which is outlined in the OJP Financial Guide.⁷ The OJP Financial Guide states that grantees may request an extension for 12 months. In extraordinary circumstances, an

⁷ OJP Financial Guide, Chapter 2 Grant Administration, Section 7.2 Period of Availability of Funds. At the time of writing, OVW had a draft version of its own financial guide, but was officially still using OJP's Financial Guide.



extension for longer than 12 months might be considered. Generally, only one extension per award will be permitted.

In order to exercise its administrative control over the funds that are awarded to grantees, we recommend that the COPS Office institute a more rigorous review process of grantees' no-cost extension requests. This process should include (1) reversing the responsibility of initiating no-cost extension requests so that the grantee issues the request instead of the COPS Office; (2) considering a limit on how many requests may be made to extend the life of a single grant; and (3) checking all no-cost extension requests against existing grants to reduce any occurrences of redundant funding. The COPS Office might also consider offering training and technical assistance around program planning and fund expenditure for grantees that are having a difficult time expending grant funds.

Performance Measures

A second issue we identified in our assessment concerns the use of performance measures in collecting appropriate data about the Meth Initiative program. The COPS Office performance measures were developed to capture information on community policing activities, not on activities specific to the Meth Initiative. From our observations, it appears that in lieu of creating new performance measures for the Meth Initiative, the COPS Office adapted its community policing performance measures for use by its Meth Initiative grantees. After reviewing the Meth Initiative performance measures we determined that they do not capture program-specific data about Meth Initiative goals or activities. The Meth Initiative performance measures are designed to focus on broad community policing and technological grantee capacity, as opposed to specifically targeting programmatic impacts on meth reduction. As a result, the COPS Office cannot provide specific data on Meth Initiative grantee programs, nor on the overall impact and outcomes of the Meth Initiative. This is noteworthy, given that over \$619 million in grant funds have been awarded since the inception of the Meth Initiative in FY 1998.



Current Performance Measures

The current Meth Initiative performance measures are outlined in table 3 below.

Table 3. COPS Office Methamphetamine Initiative Performance Measures, 2007 – Present

Objective	Performance measures	Data grantee provides
Increase the capacity of law enforcement agencies to implement community policing strategies that strengthen partnerships for safer communities and enhance law enforcement’s capacity to prevent, solve, and control crime through funding for technology, equipment and training.	Average community policing capacity implementation rating (0 to 100) of Meth grantees. Average technological capacity implementation rating (0 to 100) of Meth grantees. Successful purchase and implementation of all items and/or services listed in the application Project and Budget narratives.	Annual progress reports providing an overview of Meth grant purchases/implementation and implementation (sic) of community policing strategies. ⁸

* Source: COPS Office Methamphetamine Initiative 2007 Application Guide.

The COPS Office began listing performance measures in its Meth Initiative application guides in FY 2006. The current performance measures were established by the COPS Office in FY 2007, in response to an OMB FY 2002 Program Assessment Rating Tool (PART) review which recommended that the COPS Office develop “alternative evaluation strategies to assess the impact of grant programs.”⁹ In response, the COPS Office developed the new set of performance measures, which were subsequently approved by the Office of Management and Budget (OMB) and issued in the FY 2007 Application Guide. However, as shown in the table above, none of the Meth Initiative performance measures have been

⁸ In the 2009 application guide, “Annual” changes to “Periodic.”

⁹ <http://whitehouse.gov/omb/expectmore/detail/10000164.2002.html>



designed to provide information on the specific activities or outcomes of Meth Initiative programs. According to the COPS Office, these performance measures are not exclusive to the Meth Initiative and are used across multiple COPS Office programs to track the office-wide goal of increasing community-policing capacity. Therefore, the performance measures are not specific to, nor are they intended to be specific to, the Meth Initiative.

The first performance measure in table 3 focuses on the broad concept of community policing capacity. The COPS Office defines community policing as “a philosophy that promotes organizational strategies, which support the systematic use of partnerships and problem-solving techniques, to proactively address the immediate conditions that give rise to public safety issues such as crime, social disorder, and fear of crime.”¹⁰ We have three concerns about this performance measure being used for the Meth Initiative. The first is that the performance measure cannot capture any Meth Initiative-related outputs or outcomes, since the grantee cannot define what types of specific community policing activities were employed to combat meth problems. In addition, the measure cannot determine whether Meth Initiative program activities conform to the concept of community policing, since examples of activities are not shown. Finally, because the performance measure does not display any information on the status of meth-related crimes, we cannot know whether the community policing approach had any impact on the grantee’s meth problem.

We also noted that grantees are asked to rate their implementation of community policing through their grant program on a scale of 0 to 100. However, responses to performance measures should be objective; the data provided should be specific, measurable, and verifiable. Asking grantees to rate their own implementation using a scale of 0 to 100 can only produce subjective responses. In addition, the COPS Office does not provide an explanation of the meaning of the point values on the scale, or require any supporting empirical evidence, so grantees’ responses cannot be measured or verified.

¹⁰ COPS website <http://www.cops.usdoj.gov/Default.asp?Item=36>



The same problems exist for the second performance measure in table 3, which requires grantees to subjectively determine the technological implementation capacity they have built as a result of the grant. The COPS Office does not explain how “technological implementation” relates to combating meth, nor does it provide any explanation of the 0 to 100 scale. The third measure, which focuses on the successful purchase and implementation of items and/or services by the grantee, is also subjective, and does not provide any information that is specific to the Meth Initiative. The term “successful implementation” is an extremely broad performance measure, which is not defined, but rather left up to the grantee to interpret. This creates a situation where grantees may define “successful implementation” differently, leading to incomparable data between grantees. It is unclear what types of evidence, if any, grantees would be required to produce to demonstrate implementation of items and/or services. We believe that the three performance measures are too general and unrelated to the Meth Initiative, and as such, cannot provide the COPS Office with data on whether Meth Initiative programs are preventing, controlling, or reducing meth-related problems.

An OIG report issued in June 2009 entitled, *Improving the Office of Community Oriented Policing Services’ Grant Awarding, Monitoring, and Program Evaluation Processes* found the same basic problems with Meth Initiative performance measures. In the report, the OIG found that the COPS Office’s predominant focus on community policing in its performance measures came at the cost of not being able to report on “other program achievements.” The OIG stated that the COPS Office had not gained any “insight into how effectively or efficiently the grants were being used.” The OIG suggested that the COPS Office would benefit by using additional performance measures that track the outputs of the grants, as well as gather the data necessary for establishing benchmarks that represent a level of performance expectation within grant-funded programs and with grant recipients.¹¹

¹¹ Improving the Office of Community Oriented Policing Services’ Grant Awarding, Monitoring, and Program Evaluation Processes, OIG June 2009



When we asked COPS Office officials if the office had considered using more specific performance measures, we were informed that additional program-specific measures are under consideration. We found that the COPS Office has more meth-specific measures at its disposal. In August 2006, the COPS Office published a Problem Oriented Guide for Clandestine Meth Labs, which included eight performance measures that the COPS Office said would be helpful in determining program successes.¹² These measures were targeted and specific to meth lab seizures and clean up, but are not currently being utilized by the COPS Office. COPS Office officials informed us that the office is beginning to consider program-level performance measures.

Data Collection Methods

The COPS Office Meth Initiative application guides state that grantees are not required to collect statistical data on the performance measures. However, when asked about how they collect their performance measures, COPS Office officials stated that the office collects performance measure data through an annual Grantee Satisfaction Survey. According to COPS Office officials, the annual survey is the primary mechanism used to obtain grantee performance measures. We reviewed the survey and have determined that it asks grantees to rate the assistance they received from the COPS Office, as well as how their problem solving, organizational change, technological capacity, and community policing capacity have improved. The data is then used as part of the COPS Office strategic plan and the COPS Office's budget submissions. We reviewed the 2009 survey, but could not see how it mapped to the performance measures. Specifically, there was no clear linkage between the performance measures that were published in the application guides and the information contained in the survey, despite COPS Office officials' assertion that the survey is the primary mechanism to collect performance measure data from grantees. It is unclear what, if any, information can be gleaned from this general survey to specifically address the effectiveness of Meth Initiative grant funding.

¹² COPS Problem Oriented Guides for Police Series, No. 16 Clandestine Meth Labs 2 ed.



Furthermore, it is unclear how many Meth Initiative grantees respond to the survey. Despite the Government Performance and Results Act (GPRA) requirement that federally funded grantees report data that measures the results of their work, the COPS Office stated that it made the survey voluntary because it thought making the survey mandatory would produce inflated responses from grantees. However, the COPS Office only received a 37 percent response rate for the August 2009 survey.¹³ Therefore, we can only conclude that the annual grantee survey is not an adequate way to collect performance measurement data from grantees regarding the Meth Initiative.

Other Sources of Grantee Performance Data

We note that the COPS Office does have access to other sources of potential information, should it choose to use them. For example, in our assessment sample, 21 percent of the grantees listed their own performance measures in their grant proposals. However, because the annual Grantee Satisfaction Survey is not designed to capture specific data from grantee performance measures, there is no standardized way to receive and/or analyze the information. In addition, Meth Initiative grantees are also required, as a condition of their grant award, to complete the National Clandestine Laboratory Seizure Report (EPIC Form 143), which includes data pertaining to the number of clandestine labs that are seized. The reports are sent directly to EPIC from the grantee. The COPS Office does not request a copy of Form 143, nor does it track the submission of the form. While the COPS Office could request copies of Form 143, COPS Office officials stated that the office does not want to keep track of the forms. The submission of Form 143 is a condition of every Meth Initiative award; however, it is unclear how the COPS Office determines if the grantee has satisfied this condition.

In order to address the challenges above, we recommend that the COPS Office ensure that its system for collecting performance measure data is designed in such a way as to ensure mandatory, accurate, and objective reporting of meth-related grant activities. If

¹³ CFI sent the survey to 1,473 grantees via email, and received responses from 538.



the COPS Office continues to use the Grantee Satisfaction Survey, meth-specific performance measures should be clearly reflected in the survey, and grantees should be required to complete the survey as a condition of their awards.

Furthermore, as the COPS Office considers developing program-level performance measures for the Meth Initiative, it should take steps to ensure that the measures are clearly defined and appropriate for the program. The COPS Office could take advantage of the work completed by other DOJ program offices on meth-related performance measurement. For example, performance measures for meth-related programs, endorsed by the Bureau of Justice Assistance (BJA), encompass treatment, prevention, law enforcement (including overtime and equipment purchase), public awareness, and legislation activities. The Justice Research and Statistics Association (JRSA), who worked with BJA on the development of the meth-related performance measures, examined various program interventions, and multiple program approaches while compiling the performance measures. The COPS Office may wish to consider the work done by JRSA and BJA on meth-related performance measurement as it considers more specific performance measures.

Progress Reports

The third issue we identified in regard to the internal management of the Meth Initiative program concerns the bi-annual progress report. The COPS Office has informed us that it is in the process of developing a new progress report for the Hiring and Tribal programs, and that this new report format will eventually be rolled out to the Meth and Technical programs. With that in mind, we would like to highlight some concerns we have with the current progress report, which we would like the COPS Office to take into consideration as it designs its new progress report. Our concerns include the following: (1) use of Likert scales in the Non-Hiring Progress Report (NHPR); (2) reduced presence of a narrative in the NHPR; and (3) limited review of NHPRs by program managers.

The COPS Office application guides stipulate that Meth Initiative grantees are required to report on the progress of their grants. Progress reports are due on an annual basis for law enforcement



agencies, and quarterly for “special” agencies, such as non-profits, universities, or other associations. Prior to FY 2008, the COPS Office progress reports were called Status Update Reports (SUR). The Meth Initiative SUR was a narrative progress report, containing 16 questions, most of which required a written response. The report included questions on goals and outcomes, innovative strategies, evaluation criteria, community response and impact, types of outreach efforts, and priority areas and future needs. The SURs were collected and reviewed by COPS Office staff.

In FY 2007 the COPS Office began the process of developing the NHPR, which subsequently replaced the SUR. The COPS Office assembled an NHPR Working Group as part of its FY 2007 Strategic Initiative. The NHPR Working Group consisted of representatives from five COPS Office divisions and was tasked with creating a “simplified, standardized and streamlined” progress report. As opposed to its predecessor, the NHPR template is applicable to all non-hiring grant programs, and may be accessed and completed online.

The COPS Office states that the NHPR “measures the grantee’s community policing capacity to determine the COPS Office’s effectiveness in promoting community policing nationwide...[and is] consistent with federal regulations on monitoring and reporting program performance at 28 CFR 66.40 and 70.51 and complies with OMB approval requirements for information collection.” Meth Initiative grantees are required to report on their progress toward implementing community policing strategies in the NHPR.

In contrast to the SUR, the NHPR has ten questions, at least six of which have multiple parts. The grantees use radial buttons to answer the NHPR questions. The NHPR uses a Likert scale, which requires respondents to specify their level of agreement with a statement on a scale of 1 to 10. Other questions require a “Yes,” “No,” or “N.A.” response. The questions in the NHPR are much more general than the SUR. Grantees respond to questions about whether they met program objectives and implemented activities, purchased items in approved budget categories, hired personnel, and developed evaluation plans. The multi-part questions cover community policing capacity, problem solving, organizational



change, and increasing technological capacity, but leave no opportunity for a narrative response.

An example of the differences between the SUR and NHPR reports follows in table 4.

Table 4. Comparison of questions from the SUR and the NHPR

Question topic	Question number	Status Update Report	Question number	Non Hiring Progress Reports
Outcomes and output	13	Have all the <i>goals and outcomes</i> , as outlined in your project, been successfully realized as a result of this grant? (Yes/No) Please explain.	1	Has your agency met all <i>grant objectives</i> and implemented the programmatically approved activities scheduled to be achieved as of the reporting period? (Yes/No) Do you plan to fully implement this grant? (Yes/No)
Evaluation	8	Have you developed <i>evaluation criteria</i> for your Meth project? (Yes/No) If so, briefly summarize the criteria.	5	Does your agency currently intend to develop a plan to <i>evaluate</i> the results of this project? (Yes/No)

* Source: COPS Office Status Update Report and COPS Office Non-Hiring Progress Report, received from the COPS Office in August 2009.

As shown in the table above, the SUR questions require a narrative response from the grantee, whereas the NHPR questions require a Yes/No answer. The SUR questions also are targeted toward the Meth Initiative, while the NHPR questions are meant to be used for multiple COPS Office grants. In the SUR, grantees would have to provide narrative information to support their statements, while in the NHPR, grantees are asked to provide Yes/No answers, or to use a Likert scale to rate their progress, where 1 equals “strongly disagree” and 10 equals “strongly agree.”

The use of a Likert scale as a reporting mechanism means that grantees must subjectively report on their program progress. It also makes it difficult to analyze or compile information across progress reports, since one grantee’s interpretation of the scale may



be different from another's. In addition, not requiring any supporting narrative to demonstrate progress or detail implementation means that responses cannot be verified for accuracy.

Because the NHPR system is automated, we are concerned that program managers may no longer review progress reports. Instead, any issues the system finds are flagged for review by staff members. When asked about what issues the system might flag, COPS Office officials stated the following:

"The current NHPR flags certain grantee responses as issues if an answer is inconsistent with the terms of the grant... For example, if the grantee states that they do not plan to fully implement their grant, they will be added to the non-implementation report in the NHPR system. The progress report team then adds this issue to an issue log and assigns it to the point of contact for the program in question for further research."

We are concerned that COPS Office program managers no longer review progress reports unless an issue is flagged for review by the system. Program manager review of progress reports is one way of monitoring the status of a grant. We are also concerned that the system may flag inconsistent answers, but cannot evaluate the finer details of what is being reported. The COPS Office cited several benefits gained by moving from the SUR format to the NHPR format. Specifically, the format has simplified the reporting process for the grantees; standardized the progress report questions; and automated the collection, review, and compilation of grantee responses. In addition, the COPS Office has reported that it has a 99 percent compliance rate with grantees submitting progress reports. While such a high compliance rate is commendable, and while the COPS Office might have streamlined certain aspects of the reporting process, such as data entry and report submission, we concluded that the collection and reporting of viable program data has been hindered. In addition, by giving up program manager oversight of progress report information and, at the same time, eliminating program-specific information from grantees, the COPS Office has significantly reduced its ability to gauge the effectiveness



and progress of Meth Initiative programs.

As the COPS Office considers how to design its new progress report format, we recommend that it take into account the concerns noted above, particularly our concerns regarding a lack of a narrative or supporting documentation in the NHPR. We encourage the COPS Office to design the future iteration of its progress reports in such a way that grantees can objectively report on their program progress, including providing justifications for progress or obstacles to implementation. We commend the COPS Office on its intention to tie progress reports back to the application and performance measures, and believe this is a positive step towards better documentation of grantee activities.

Conclusion

While we recognize that earmarked programs present an array of challenges for the administering agencies, our assessment identified areas for improvement related to external communications, ongoing grants management, and internal oversight processes. We encourage the COPS Office to take this opportunity to review the suggested areas for improvement to help strengthen the Meth Initiative.



Recommendations

External Communications

Recommendation 1. The COPS Office should alert Congress when awards are earmarked to grantees that are unable to demonstrate the greatest need for meth-related assistance.

Recommendation 2. The COPS Office should initiate communication with the DEA to develop a consistent definition of the term “hot spot” that can be used in determining which areas of the country are most in need of funding to address the meth problem. The COPS Office should take into account meth lab seizures, drug-related arrests, and treatment admission when determining how to define a “hot spot.”



Recommendation 3. Using the definition of a meth “hot spot,” the COPS Office should collect and examine data, in consultation with the DEA, to determine which areas of the country have the greatest problems with meth.

Recommendation 4. The COPS Office should consult with the DEA and provide information on grantee location and a project abstract to ensure that proposed Meth Initiative awardees are thoroughly reviewed and vetted. The COPS Office should also ensure that award amounts are made consistent with the meth-related problems of the jurisdiction receiving funds.

Internal Oversight

Grant Extensions

Recommendation 5. The COPS Office should develop a policy to govern the extension process, which might include conducting analysis of previous no-cost extension requests; making a determination as to whether the current no-cost extension request is warranted; and requiring management-level approval when granting no-cost extension requests.

Recommendation 6. The COPS Office should provide the OJP Office of the Chief Financial Officer (OCFO) with information on grantees who repeatedly request no-cost extensions, specifically those grantees with unexpended funds from previous open and active grants that contain the same activities, so that OCFO can use the information as part of its risk assessment process and potentially target those grantees for financial monitoring.

Performance Measures

Recommendation 7. The COPS Office should design and implement performance measures that specifically measure Meth Initiative program impact and outcomes for open and active Meth Initiative grants.

Progress Reports

Recommendation 8. The COPS Office should consider how to capture objective and program-specific information that details



implementation challenges and program accomplishments in its Non-Hiring Progress Report Format.

COPS Office Comments and OAAM Response

We provided a draft of our report to the COPS Office for comments. The COPS Office comments on the recommendations and our responses are summarized below. See Appendix B for the full text of the COPS Office comments.

During the writing of this report, the 112th Congress approved a ban on earmarks for FY 2011 and FY 2012. Therefore, neither the FY 2011 appropriation that was passed on April 14, 2011, nor the FY 2012 appropriation that was passed on November 18, 2011, contained funding for the Meth Initiative program.

The ban on earmarks affected some of the findings that OAAM identified in this report. Specifically, OAAM recognizes that Recommendations 1 - 4 cannot be acted upon by the COPS Office at this time because they pertain to the issues of the Meth Initiative as an earmarked program. OAAM did not require the COPS Office to provide responses to these recommendations. However, the COPS Office chose to respond to all of the recommendations in the report.

External Communications

Recommendation 1. The COPS Office should alert Congress when awards are earmarked to grantees that are unable to demonstrate the greatest need for meth-related assistance.

The COPS Office stated in its response that it has always contacted Congressional staff members when earmarked awards under any grant program did not appear to be warranted or were not consistent with the intent of the initiative. The COPS Office noted that to date, all earmarked grants, including those funded under the Meth Initiative, have been deemed eligible for awards after appropriate discussions with both Congressional staff and grantees have taken place.



The COPS Office stated that while Congress has neither directed it to perform, nor provided funding for an in-depth examination or study to determine the demonstration of “greatest need” regarding meth activity, it has made every effort to ensure earmarked awards are compliant with Office of Management and Budget, DOJ, and COPS Office grant-making policies and regulations. The COPS Office welcomes the opportunity to conduct a meth-based study in the future should Congress provide for such a study within appropriated funding levels.

Based on the fact that the Meth Initiative has not received funding for FY 2011 or FY 2012, we consider this recommendation closed. If funding for the Meth Initiative becomes available in the future, OAAM will conduct a targeted review to determine if the COPS Office has taken action to ensure that those grantees identified by Congress to receive funds demonstrate the greatest need, consistent with the intent of the Meth Initiative.

Recommendation 2. The COPS Office should initiate communication with the DEA to develop a consistent definition of the term “hot spot” that can be used in determining which areas of the country are most in need of funding to address the meth problem. The COPS Office should take into account meth lab seizures, drug-related arrests, and treatment admission when determining how to define a “hot spot.”

Recommendation 3. Using the definition of a meth “hot spot,” the COPS Office should collect and examine data, in consultation with the DEA, to determine which areas of the country have the greatest problems with meth.

Recommendation 4. The COPS Office should consult with the DEA and provide information on grantee location and a project abstract to ensure that proposed Meth Initiative awardees are thoroughly reviewed and vetted. The COPS Office should also ensure that award amounts are made consistent with the meth-related problems of the jurisdiction receiving funds.

In response to Recommendations 2 – 4, the COPS Office stated that if it receives funding for the Meth Initiative under future legislation which includes the term “hot spot,” it will initiate communication



with the DEA to consider the development of a consistent definition of that term in order to address those areas of the country in need of assistance to combat meth and other drug-related problems. In addition, if funding is provided by Congress to allow the COPS Office to conduct a study, the COPS Office, in consultation with the DEA, will determine which areas of the country have the greatest need for meth-related assistance.

Based on the fact that this program has not received funding for FY 2011 or FY 2012, we consider Recommendations 2 - 4 closed. If funding for the Meth Initiative becomes available in the future, OAAM will conduct a targeted review to determine if the COPS Office has taken action to consult with the DEA on "hot spots," as well as future Meth Initiative awards.

Internal Oversight

Grant Extensions

Recommendation 5. The COPS Office should develop a policy to govern the extension process, which might include conducting analysis of previous no-cost extension requests; making a determination as to whether the current no-cost extension request is warranted; and requiring management-level approval when granting no-cost extension requests.

The COPS Office stated in its response that it has an extension policy that has been in effect since January 2007, which requires the analysis of no-cost extension requests and determination as to whether the no-cost extension requests are warranted. The COPS Office policy requires an extension to be approved at the management level when the cumulative amount of the time requested by a grantee exceeds half the original grant period. The COPS Office noted that it is working to identify ways to improve all of its processes, including the extension process, and that the above recommendation would be taken into consideration during the review of its current policy. The COPS Office concluded by stating that it has been its experience that setting an arbitrary limit on the amount of time an agency can request for an extension, or limiting the number of extension requests that can be submitted, is not reflective of the realities COPS Office grantees face in the current economic crisis.



The COPS Office provided its extension policy to OAAM as an attachment to its response to the draft assessment report. OAAM notes that it was not provided the policy during the assessment, nor was the policy presented to OAAM during the assessment exit conference. Having now examined the document, OAAM recognizes that the COPS Office has policies in place to govern its extension process; however, our concerns regarding the no-cost extension process remain. Specifically, OAAM is concerned about the COPS Office practice of issuing multiple no-cost extensions to grantees that have concurrent funding for similar activities, especially when those no-cost extensions cause overlaps of funding across multiple years. While we acknowledge that setting an arbitrary time limit on extensions might not reflect the realities faced by grantees, the practice of extending grants repeatedly does not fully consider the opportunity cost associated with reallocating these funds to potential grantees that may have a greater need. The practice of issuing multiple extensions also may suggest to grantees that there is no urgency to complete their projects and to close out their grants, and that it is for grantees to decide when they would prefer to conclude their programs.

The COPS Office has stated that it will take the above recommendation into consideration when it reviews its current extension process. This recommendation can be closed when the COPS Office provides OAAM with a documented review of its no-cost extension process.

Recommendation 6. The COPS Office should provide the OJP Office of the Chief Financial Officer (OCFO) with information on grantees who repeatedly request no-cost extensions, specifically those grantees with unexpended funds from previous open and active grants that contain the same activities, so that OCFO can use the information as part of its risk assessment process and potentially target those grantees for financial monitoring.

The COPS Office stated in its response that its Grant Monitoring division utilizes a Grant Assessment Tool (GAT), to perform an annual analysis of the risk associated with each grantee to help establish a monitoring plan for the fiscal year. The COPS Office stated that it will include additional criteria in its annual risk



assessment process to take into account whether a grantee repeatedly requests no-cost extensions. The COPS Office will forward the information to OAAM for the coordination of OCFO site visits.

This recommendation can be closed when the COPS Office provides evidence that it has incorporated additional criteria identifying grantees that repeatedly request no-cost extensions in its annual GAT assessment and submits its FY 2013 GAT data to OAAM.

Performance Measures

Recommendation 7. The COPS Office should design and implement performance measures that specifically measure Meth Initiative program impact and outcomes for open and active Meth Initiative grants.

The COPS Office stated in its response that in FY 2011 it began a comprehensive evaluation of all grant programs during program development to strengthen the program goals and outcomes in order to maximize the effectiveness of grants awarded to local law enforcement. The COPS Office stated that if the Meth Initiative program is funded in the future, it will assess and strengthen the program's performance measures by incorporating outcomes and metrics from similar DOJ programs. The COPS Office response also noted that performance measures and outcomes for existing grants are established pre-award and that improvements would be made in subsequent years during the program development process.

Based on the fact that this program has not received future funding for FY 2011 or FY 2012, and because performance measures and outcomes are established pre-award, we consider Recommendation 7 closed. If funding for the Meth Initiative becomes available in the future, OAAM will conduct a targeted review to determine if the COPS Office has assessed and revised the Meth Initiative performance measures to ensure program impact and outcomes are accurately measured.



Progress Reports

Recommendation 8. The COPS Office should consider how to capture objective and program-specific information that details implementation challenges and program accomplishments in its Non-Hiring Progress Report Format.

The COPS Office stated in its response that in FY 2011 the COPS Office streamlined its periodic programmatic progress reports for grants, including the Non-Hiring Progress Report, into a single COPS Merged Progress Report (new report). According to the COPS Office, the new report collects a variety of program-specific data and allows grantees to submit both accomplishments and requests for technical assistance for grant implementation. The COPS Office confirmed that the new report format was implemented in January 2011, and that all hiring and non-hiring grantees are required to use it.

The COPS Office provided a copy of the new report to OAAM as an attachment to its response to the draft assessment report. OAAM notes that it was not provided the new report during the assessment, nor was this new report format presented to OAAM during the assessment exit conference.

OAAM has reviewed the new report, and notes that it is an improvement over the previous Non-Hiring Progress Report. In particular, OAAM recognizes that the new report includes sections that allow for identification of obstacles to implementation and requests for programmatic assistance. However, 28 CFR §66.40 provides DOJ program offices with specific direction on the content of program reports. Specifically, the regulation states that “Performance reports will contain, for each grant, brief information on the following: A comparison of actual accomplishments to the objectives established for the period... [and] the reasons for slippage if established objectives were not met.” Despite its improvements over the previous progress report, the new report does not fully meet these requirements.

After reviewing the remainder of the new report, OAAM’s concerns regarding the capture of objective and program-specific information remain. The new report is still not designed to elicit



information from Meth Initiative grantees about the progress made in their programs. While the report has a section in which the grantee is asked to report on program accomplishments, barriers to implementation, and the grantee's plan to evaluate its progress to date, only grantees with certain cooperative agreements under the Community Policing Development (CPD) program are required to complete this section. While there is a specific question for Meth Initiative grantees regarding their intent to assess the results of their grant, this question only applies to FY 2007 Meth Initiative grantees.

With the increased emphasis on federal transparency and accountability, DOJ leadership relies upon grant progress reports as a means to ensure effective and proper stewardship of taxpayer dollars. In order to comply with the regulations outlined in 28 CFR §66.40, at a minimum, the COPS Office should consider expanding its requirements for completing the narrative section of the new report on program accomplishments and obstacles to implementation to include all grantees.

This recommendation can be closed when the COPS Office provides OAAM with documentation that it has considered the guidelines outlined in 28 CFR §66.40, and its plans to meet these requirements. If the COPS Office determines it is already meeting the requirements outlined in 28 CFR §66.40, an explanation of how it is obtaining information on actual accomplishments by Meth Initiative grantees should be provided to OAAM.



Appendix A. Objective, Scope, and Methodology

The purpose of this assessment was to provide Community Oriented Policing Services (COPS) Office leadership with a performance analysis of its Methamphetamine (Meth) Initiative grant program. The objective of our assessment was to analyze COPS Office Meth Initiative grantee and grant program performance. Our assessment scope included a review of the COPS Office Meth Initiative from Fiscal Year (FY) 1998 through FY 2009.

From July 2009 through May 2010, the Office of Audit, Assessment, and Management (OAAM) did the following:

- Reviewed the history of the Meth Initiative, including the funding history provided by the COPS Office from inception through December 2009;
- Identified and analyzed program performance measures and performance data provided by the COPS Office;
- Selected a sample of grantees from which to identify program accomplishments, promising practices, and areas for program improvement, and reviewed grantee files received from the COPS Office as of August 2009;
- Reviewed the COPS Office's implementation of specific recommendations from the Department of Justice (DOJ) Office of the Inspector General (OIG) as they related to performance;¹⁴ and
- Examined the COPS Office's implementation of select OIG recommendations to assess its overall performance measurement activities.

OAAM collected information from the following sources:

¹⁴ OIG Audit Report 06-16, "The Office of Community Oriented Policing Services Methamphetamine Initiative," March 2006.



- Meth Initiative documentation provided by the COPS Office, including Meth Initiative grant files and funding history;
- Meth Initiative Audit documentation provided by the OIG;
- Interviews with key officials in the COPS Office, the Bureau of Justice Assistance (BJA) and the Justice Research and Statistics Association (JRSA); and
- Documents and reports from the U.S. Congress, the Office of Management and Budget, the Drug Enforcement Administration (DEA), and other relevant agencies and organizations.

OAAM performed extensive background research on the various responses toward meth production, use, and distribution that are undertaken by law enforcement and other service providers across the nation. OAAM familiarized itself with the Meth Initiative, reading through Congressional Appropriations language, FY 1998 - FY 2009 Meth Initiative Application Guides, OIG's Audit Report 06-16, "The Office of Community Policing Services Methamphetamine Initiative," issued in March 2006, and various meth-related publications available on the COPS Office website.

OAAM examined a sub-set of findings from the OIG Audit Report 06-16. OAAM reviewed the COPS Office's official responses to the OIG's findings, and followed up with the COPS Office on the implementation status of specific recommendations. Using the OIG's state-by-state analysis of meth incidents (as reported by the DEA's El Paso Intelligence Center) versus Meth Initiative grant funding, OAAM produced these data for FY 2005 through FY 2008.

At OAAM's request, the COPS Office provided a funding history of the Meth Initiative from FY 1998 - FY 2009. The funding history included descriptions of grantees, the number of grants awarded to each grantee, award amounts, and project periods. OAAM selected a judgmental sample from the funding history grantees, and performed a thorough review of the selected grantees programs. The COPS Office provided OAAM the Meth Initiative award files for the sampled grantees, which contained award packages, certifications and assurances, narrative applications, no cost extension documentation, and progress reports.

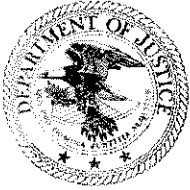


OAAM compared Congressional Appropriations language to the performance measures listed in the Meth Initiative application guides from FY 2006 - FY 2009 and to Meth Initiative grantee files. OAAM interviewed the COPS Office on its performance measures, and examined grantee files for performance data. OAAM also researched performance measurement policies of other OJP offices, and spoke with subject matter experts in BJA and JRSA.



Appendix B. COPS Office Comments

The following pages contain the complete text of comments.



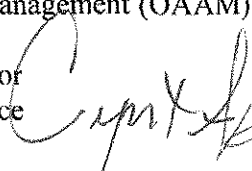
U.S. DEPARTMENT OF JUSTICE
OFFICE OF COMMUNITY ORIENTED POLICING SERVICES

COPS

Grant Operations Directorate/Audit Liaison Division
145 N Street, N.E., Washington, DC 20530

MEMORANDUM

TO: Maureen A. Henneberg, Director
Office of Audit, Assessment and Management (OAAM)

FROM: Cynthia A. Bowie, Assistant Director
Audit Liaison Division, COPS Office 

DATE: December 13, 2011

SUBJECT: Draft Report for the COPS Office Management of the
Methamphetamine Initiative

This memorandum is in response to the OAAM's above-referenced draft report, dated November 25, 2011. The COPS Office thanks the OAAM for the opportunity to respond to the recommendations provided in the report.

For ease of review, the draft report recommendations are stated in bold and underlined, followed by the COPS Office's response to each recommendation. With regard to Recommendations 1 through 4, due to the elimination of earmarked grants in FY2011 and FY2012 COPS Office appropriations and because Recommendations 1 through 4 of the assessment report pertain to the issues of the Methamphetamine Initiative as an earmarked program, OAAM has not required the COPS Office to provide responses at this time. However, we have chosen to respond to all recommendations in the report.

Recommendation 1. The COPS Office should alert Congress when awards are earmarked to grantees that are unable to demonstrate the greatest need for meth-related assistance.

COPS Office Response:

The COPS Office has always contacted Congressional staff members when earmarked awards under any grant program have not appeared to be warranted or were not consistent with the intent of the initiative. In June 2006, the COPS Office agreed to document such communications to record when such discrepancies occurred. Such documentation is done within the COPS Earmark Administration Module database. To date, all earmarked grants – including those funded under the Methamphetamine Initiative – have been deemed eligible for award after appropriate discussions with both Congressional staff and grantees have taken place.

While Congress has neither directed the COPS Office nor provided funding for COPS to perform an in-depth examination or study to determine the demonstration of "greatest need" regarding methamphetamine activity, COPS has made every effort to ensure that Congressionally directed and earmarked awards are made in full compliance with all Office of Management and Budget,

ADVANCING PUBLIC SAFETY THROUGH COMMUNITY POLICING

Department of Justice, and COPS Office grant-making policies and regulations. The COPS Office welcomes the opportunity to conduct such a meth-based study in the future, should such a study be provided for by Congress within appropriated funding levels.

Recommendation 2. The COPS Office should initiate communication with the DEA to develop a consistent definition of the term "hot spot" that can be used in determining which areas of the country are most in need of funding to address the Meth problem. The COPS Office should take into account meth lab seizures, drug-related arrests, and treatment admission when determining how to define a "hot spot."

Recommendation 3. Using the definition of a Meth "hot spot," the COPS Office should collect and examine data, in consultation with the DEA, to determine which areas of the country have the greatest problems with Meth.

Recommendation 4. The COPS Office should consult with the DEA and provide information on grantee location and a project abstract to ensure that proposed Meth Initiative awardees are thoroughly reviewed and vetted. The COPS Office should also ensure that award amounts are made consistent with the meth-related problems of the jurisdiction receiving funds.

COPS Office Response (Recommendations 2, 3 and 4):

Should the COPS Office receive funding for the Methamphetamine Initiative under any future legislation which includes the term "hot spot," we will initiate communication with the DEA to consider the development of a consistent definition of that term in order to address those areas of the country most in need of assistance to combat meth and other drug-related problems. If further examination determines that such action is warranted, and the DEA is in agreement, the COPS Office will also consider including as the criteria for "hot spot" such statistics as meth lab seizures, drug-related arrests, and treatment admission. Furthermore, if there is funding provided by Congress to allow the COPS Office to conduct such a study, the COPS Office, in consultation with the DEA, will determine which areas of the country have the greatest need for meth-related assistance. To that end, and as necessary, we will work with the DEA in ensuring that award amounts are made consistent with the meth-related problems with the jurisdiction receiving funds.

Recommendation 5. The COPS Office should develop a policy to govern the extension process, which might include conducting analysis of previous no-cost extension requests; making a determination as to whether the current no-cost extension request is warranted; and requiring management-level approval when granting no-cost extension requests.

COPS Office Response:

The COPS Office created a policy, which has been in effect since January of 2007 entitled *Policies and Procedures for the Processing of Extension Requests* (see Attachment 1 and accompanying document attachments 1a through 1k), and is consistent with the assessment in conducting analysis of no-cost extension requests and the determination as to whether no-cost extension requests are warranted.

Currently, the COPS Office Grants Administration Division is working to identify ways to improve all processes, including the extension process. Improvements identified will be reflected in changes to the current policy and the above recommendations will be taken into consideration while that review/improvement of the current policy takes place. While the grantee is accountable for the administration of its awards, it should be noted that COPS feels it is both our responsibility and a matter of good customer service to provide our grantees with notice that their awards are expiring, and inform them of the extension process.

The current extension policy does indicate when an extension must be approved at the management level (when the cumulative amount of time requested by agencies exceeds half the original grant period). Based on our experience, it is routine that agencies implementing these complex projects will require some additional time to complete their respective awards which is reflected in the COPS Office policy. COPS is mindful of offering appropriate administrative oversight, while still allowing for expedient responses and quality customer service to our grantees and feels that our current policy provides an appropriate level of that balance. The COPS Office wants to ensure the money gets on the street where it is needed most, while doing so in a fiscally responsible way. In short, it has been our experience that setting an arbitrary limit on the amount of time an agency can request for an extension or limiting the number of extension requests that can be submitted is not reflective of the reality these agencies face in the current economic crisis.

Based on the above management action and attached information, the COPS Office requests closure of Recommendation 5.

Recommendation 6. The COPS Office should provide the OJP Office of the Chief Financial Office (OCFO) with information on grantees who repeatedly request no-cost extensions, specifically those grantees with unexpended funds from previous open and active grants that contain the same activities, so that OCFO can use the information as part of its risk assessment process and potentially target those grantees for financial monitoring.

COPS Office Response:

The COPS Office Grant Monitoring Division (GMD) conducts programmatic monitoring and cursory financial review of COPS grantees. GMD utilizes a Grant Assessment Tool (GAT), which is a decision support system designed for Grant Monitoring Specialists to perform an annual analysis of the risk associated with each grantee to help establish a monitoring plan for the fiscal year. The Grant Monitoring Division will include additional criteria in our annual risk assessment to indicate agencies that repeatedly request no-cost extensions, and will forward the information to the Office of Audit, Assessment, and Management for the coordination of OCFO site visits.

Based on the above management action, the COPS Office requests closure of Recommendation 6.

Recommendation 7. The COPS Office should design and implement performance measures that specifically measure Meth Initiative Program impact and outcomes for open and active Meth Initiative grants.

COPS Office Response:

In FY2011, the COPS Office began a comprehensive evaluation of all grant programs during program development to strengthen the program goals and outcomes in order to maximize the effectiveness of the grants awarded to local law enforcement. If the Methamphetamine Initiative program is funded in the future, the COPS Office will assess and strengthen the program's performance measures by incorporating outcomes and metrics from similar Department programs.

Performance measures and outcomes for existing grants are established pre-award and included in the award application used by applicants. Any improvements to programs are made in subsequent years during the program development process.

Based on the above management action, the COPS Office requests closure of Recommendation 7.

Recommendation 8. The COPS Office should consider how to capture objective and program-specific information that details implementation challenges and program accomplishments in its Non-Hiring Progress Report Format.

COPS Office Response:

In FY2011, the COPS Office periodic programmatic progress reports for grants, including the Non-Hiring Progress Report, were streamlined into a single COPS Merged Progress Report. (Please see Attachment 2.) The revamped report collects a variety of program-specific data and allows grantees to submit both accomplishments and requests for technical assistance for grant implementation.

Based on the information provided, the COPS Office requests closure of Recommendation 8.

The COPS Office thanks the Office of Audit, Assessment, and Management for the opportunity to respond to the draft report. If you have any questions, please contact me at (202) 616-3645; Marcia Samuels, Acting Director for Operations at (202) 514-8507; or Martie Viterito, Program Audit Liaison, at (202) 514-6244.

Attachments

cc: (copies provided electronically)
Joshua Ederheimer
Principal Deputy Director, COPS Office

Marcia O. Samuels-Campbell
Acting Deputy Director for Operations, COPS Office

Rebekah Whiteaker
Chief of Staff, COPS Office

COPS Office Policy

Policy Number: CP104-12

Policy Title: Policies and Procedures for Processing Extension Requests

Originating Division: Grants Administration Division, Operations

Divisions Affected: All Divisions

Date Effective: 1/25/07

Narrative:

I. Background

Within the COPS Office, no-cost extension processing procedures and management activities have historically been a function of individual program offices and teams. As such, a variety of different approaches and processes exist within the agency for performing this key grant maintenance function. To streamline business practices, and commensurate with COPS Office FY 2006 Strategic Goals, a cross-divisional working group was created to develop a standardized extension request form, and to investigate the possibility and utility of standardizing agency policies and procedures for processing grant extensions. However, it was determined that the absolute standardization of extension policies and procedures was neither practical nor advisable, and that a targeted approach to standardization would be of greater benefit to the agency as a whole.

II. Purpose

The purpose of this memorandum is to outline the policies, procedures, roles and responsibilities of program offices in processing grant extensions prior to the award expiration date. While this document standardizes certain extension processes, some aspects of the process are left to the discretion of the program offices, teams, or Assistant Director overseeing the division. This type of structure provides a general framework for processing extensions, while allowing flexibility for the varied types of grant programs being managed office-wide. As part of the standardization of procedures, a new, OMB-approved COPS Extension Request Form has been developed, as well as other correspondence (see attachments #1 through #11) designed to streamline the amount and type of external correspondence the agency will utilize for this task. Ultimately, it is hoped that this policy will help to streamline extension processes, delineate responsibilities related to the extension process, improve organizational efficiency, and foster a more consistent and thorough review of each extension request.

III. Creating and Mailing COPS Extension Request Forms

GAD/Database Responsibilities

- A. At the beginning of each month, a designated GAD representative will query CMS to establish three categories of grants to determine which agencies may or may not need a COPS Extension Request Form and/or letters notifying them of grant expiration. The categories are as follows:

Data Set 1 (DS-1)

Grants expiring within approximately 120 days from the start of the current month. The data in DS-1 will be mail merged into the COPS Extension Request Form (see attachment #1), to be mailed with an initial notification of grant expiration letter (see attachment #2) and a program-specific FAQ sheet.

Data Set 2 (DS-2)

Grants expiring within approximately 60 days from the start of the current month. The data in DS-2 will be cross-referenced with other data (see Section III.B) to determine which agencies will require a follow-up/final COPS Extension Request Form and grant expiration notification letter (see attachment #3).

Data Set 3 (DS-3)

Grants that received a short extension of less than 120 or 90 days, and that were not captured by the queries for DS-1 or DS-2. [An example of this type of scenario might be an extension that was given to an agency for 90 days to provide the agency additional time to complete their grant project.] Given the short timeframe, grants in this category would not have received a COPS Extension Request Form or the initial grant expiration notification letter in the normal time format of three to four months prior to the grant end date. This data set shall also include any short term administrative extensions that were approved by the program office/team as well. In short, the purpose of this data set is to capture those grants that were recently given such brief extensions such that they would not be captured in either of the two previous queries/data sets. The data/list of agencies in DS-3 will be forwarded to the appropriate program office/team via email. These agencies may require more specialized/individualized follow-up since they cannot be captured by the queries/letter process as delineated in this document.

All queries should be accurately dated, titled and saved to serve as electronic documentation for future reference and mail merges. This shall be done for all grant programs and for all divisions that have grants or cooperative agreements.

- B. Once the three primary data sets have been established, the designated GAD representative will then cross-reference this information against two additional factors to determine which agencies should be sent grant expiration notification letters and the COPS Extension Request Form.
 1. DS-1, DS-2, and DS-3 shall be cross-referenced against CMS and/or Access tables that list the agencies/grant numbers that have received a final extension approval (see attachment #4) letter. Agencies that were previously mailed a final extension approval letter shall not be sent a COPS Extension Request Form. These grants/cooperative agreements will be moved to closeout when appropriate. Refer to Section IX for guidance on utilizing the final extension approval letter.
 2. The information contained within DS-2 shall be cross-referenced against CMS and/or Access tables to determine which agencies indicated on the initial COPS Extension Request Form that “no extension” was necessary for their grant. These agencies will not receive any further extension-related correspondence for

these grants/cooperative agreements and they will be moved to closeout when appropriate.

- C. The designated GAD representative is responsible for completing the following additional tasks within the first ten (10) days of each month:
1. Creating an initial grant expiration notification letter, COPS Extension Request Form and mailing labels via mail merge for those agencies that comprise DS-1. Copies of these documents shall be forwarded to the appropriate program office/team electronically.
 2. Creating the follow-up/final grant expiration notification letter, COPS Extension Request Form and mailing labels via mail-merge for those agencies that comprise DS-2. Copies of these documents shall be forwarded to the program office/team electronically.
 3. Providing notification to program offices/teams via email about agencies which may require additional follow-up (e.g., those in the DS-3 group).
 4. Providing a list of all agencies that have grants that are scheduled to expire (comprising DS-1, DS-2, and DS-3) to the Grant Monitoring Division, the Audit Liaison Division, the Legal Division, and the Finance Division. Each list should include the agency name, ORI, grant number, and grant expiration date.

Program Office/Team Responsibilities

Program offices/teams shall be responsible for completing the following tasks within ten (10) days of receiving the aforementioned mail-merged correspondence and/or data from the GAD representative:

1. Printing and mailing extension request correspondence associated with DS-1 and DS-2 grants. This correspondence includes a cover letter, a mail-merged version of the COPS Extension Request Form, and a program-specific copy of the standardized frequently asked questions (see attachment #5).
2. Sending a copy of the dated cover letter to the grant and OC/Finance files for the purpose of documentation. A copy of the mail-merged COPS Extension Request Form shall also be maintained *electronically* by either the program office/team or the designated GAD official.
3. Determining which agencies in DS-3, if any, require additional follow-up to evaluate whether another extension is needed to complete grant requirements. This may be determined on a case-by-case basis. The following steps shall be taken if an agency requires contact to determine if an additional extension is needed:
 - a. Revise the language of the initial grant expiration notification letter to appropriately outline the end date of the grant and the deadline for responding.
 - b. Mail the grantee the revised letter, along with a mail-merged COPS Extension Request Form and a frequently asked questions sheet.
 - c. Send a copy of this documentation to both the grant and OC/Finance files.
 - d. For unresponsive grantees, three contacts should be made to the agency (initial contact plus two follow-ups) to ensure that any necessary extension request is submitted. [Please refer to Section VII for

procedures to be used for contacting and documenting the contacts with agencies.]

- e. If it is determined that no additional time is necessary, a memo to the file shall document the contacts and corresponding result(s).

IV. Receiving/Data Entering Extension Request Forms

Incoming COPS Extension Request Forms shall be received directly by the appropriate program office/team via fax or mail. Prior to reviewing an extension request, each program office/team is responsible for the following:

1. Date-stamping the completed Extension Request Form to document when it was received by the program office/team.
2. Data entering the date indicated on the date stamp into the appropriate CMS module. The field to be updated should indicate either "Extension Request Entered" or "Extension Request Received" under the Award Information Tab. For tracking purposes, the initials of the reviewer should also be data entered.

V. Reviewing Extension Request Forms

Individual program offices/teams, as designated by the Assistant Director who oversees the division, shall be responsible for reviewing Extension Request Forms for any programs under their authority. The Assistant Director who oversees each program office/team is responsible for determining what constitutes a reasonable amount of time for reviewing and processing Extension Request Forms based on workload and available resources. Program offices/teams shall ensure that any request that is received within a reasonable amount of time prior to the grant expiration date is reviewed and processed prior to the grant expiration date. [Please review Section IX for additional information regarding situations where an extension request is approved after the expiration date.] The following guidelines must be followed by all program offices/teams when reviewing COPS Extension Request Forms:

1. Extension requests for specific programs should be reviewed consistently relative to other requests for the same program. Criteria to consider when reviewing extension requests may include (but are not limited to) the following:
 - a. The amount of the project completed by the current end date.
 - b. The reasonableness of the implementation timeline provided.
 - c. The number and length of prior extensions granted for the award.
 - d. Overall length of the award if the current request is approved.
 - e. Whether the agency's rationale for the implementation delays is reasonable, as well as their plan for remedying those delays.
 - f. Whether the amount of time requested accurately reflects that which is required to complete the grant/cooperative agreement.
 - g. Other factors relevant to the request.
2. Individual or cumulative extension requests greater than half of the grant's original term (e.g., an extension greater than 18 months on a 36-month grant) require consultation with the Assistant Director overseeing the program office/team, or his/her designate, prior to the approval of the request. An Assistant Director may require consultation for individual or cumulative extension requests less than this amount of time as they deem necessary. However, an extension of time greater than

half of the grant's original term is the maximum amount of time a grant may be extended by a program office without consultation.

VI. Documenting Extension Approvals and Denials

Documentation

The individual(s) designated by the Assistant Director of each program office/team shall be responsible for properly documenting both extension approvals and denials. As such, the "Confirmation Letter Mailed" field in CMS (or other field as appropriate) must be updated to reflect the date of the mailing and the initials of the sender. All extension request documentation submitted by the agency shall be sent to the grant file. Additionally, a copy of each extension approval or denial letter must be made for and sent to each of the following:

1. The grantee.
2. The program file.
3. The OC/Finance file.
4. The Financial Analyst responsible for IFMIS obligations (for extension approval letters only).

Approved Extension Requests

Approving an extension request requires that the program office/team send an approval letter (see attachment #6) to the agency to provide official notification of the new award end date. Extension documentation procedures should be followed as outlined above.

Denied Extension Requests

Occasionally, it may be necessary to deny an extension request due to the length of the request, a lack of plans for remedying project delays, etc. (see Section V for a list of extension evaluation criteria). For cases in which the submitting agency does not initially provide adequate documentation to support the amount of time requested, the procedures for obtaining additional extension documentation (see Section VII) must be followed prior to considering an extension denial. If the agency has not submitted adequate information to justify the extension request after following those procedures, then a denial may be approved at that time. Since the denial of an extension request may ultimately impact an agency's ability to draw down funds, all extension request denials must be approved by the appropriate Assistant Director. Denying an extension request requires that the program office/team send a denial letter (see attachment #7) to the agency to serve as official notification of the action. Copies of this letter shall be made and forwarded in accordance with the guidelines listed above.

VII. Extension Requests Submitted with Inadequate Documentation

In instances where it has been determined by a program office/team (as designated by the appropriate Assistant Director) that the submitting agency provided inadequate or contradictory information to justify their extension request, or in situations where the information provided does not allow the reviewer to make an accurate decision regarding how long to extend the grant, the following guidelines should be followed:

1. The agency's law enforcement executive/government executive/POC shall be contacted a minimum of three times to obtain the necessary documentation.

- a. At least one contact must be by phone.
 - b. All contacts must be documented by the COPS official to include the date, type of contact (phone, fax, letter, etc.), and the substance of the information provided during that contact.
 - c. If necessary, the final contact shall be a letter sent via fax and certified mail (see attachment # 8) to both the law enforcement executive and the government executive outlining each prior contact, the information requested, and a final deadline for providing the requested information.
2. If the agency is completely unresponsive to the three consecutive contacts as outlined above, the extension request may be denied. A letter, sent via fax/certified mail, documenting the denial of the request (see attachment #9) shall be forwarded to the agency as outlined in Section VI. A memo written by the program office/team will be placed in the file (see attachment #10) to document all attempts to obtain the missing information.
 3. If, at any time during the course of contacting the agency, the agency responds, even with inadequate information, the COPS official will continue working with the agency to obtain the missing information.
 4. In cases where an award will expire before missing information can be collected, an administrative extension may be granted (see Section VIII).

VIII. Administrative Extensions

General

Administrative extensions do not require any information to be submitted by the agency, nor is it required that they be requested by the agency that will receive the extension. Administrative extensions should be reserved for use in rare circumstances to keep a grant active that would otherwise expire and thus become ineligible for an extension. An administrative extension may be considered when:

1. A COPS official is in contact with an agency to obtain additional information necessary to process an extension request; however, the grant will expire before all the appropriate documentation can be collected. The length of extension for these types of scenarios shall not exceed three months, unless otherwise approved by the Assistant Director who oversees the program office/team reviewing the extension request. If necessary, additional administrative extensions may be approved at a later date.
2. An agency has an active IRM or audit issue which necessitates that the grant period remain active while the issue is being resolved (e.g., an agency has an open audit issue, and has been advised not to proceed with their grant until the issue is resolved). The length of each administrative extension shall be based upon the recommendation of the requesting division. However, an administrative extension shall not exceed a period of one year without approval from the Assistant Director representing the requesting division. If necessary, additional administrative extensions may be approved at a later date.

Requesting an Administrative Extension

To initiate an administrative extension, the requesting division must write an e-mail or memo to the appropriate program office/team a minimum of 15 days prior to the end date of the award. For instances in which the requesting division discovers the need to extend a grant after this 15-day window has passed, the request for an extension should be forwarded to the appropriate program office/team as soon as possible. The written correspondence should include the following:

1. A clear request for an administrative extension, stating the agency name, grant number, supplement number (if applicable), and any other identifying information deemed reasonable and necessary.
2. A brief explanation of the issue(s) to be resolved, and an anticipated timeframe for resolving them.
3. A suggested, reasonable amount of time for the extension (please refer to information listed earlier in this section for guidance).

Processing Administrative Extensions

1. The program office/team shall utilize the documentation described above to process an administrative extension request. Once an administrative extension has been approved, a letter (see attachment #11) addressed to the agency will state that the extension has been approved, and contain the following:
 - a. An explanation that an administrative extension is being provided solely to allow COPS additional time to collect information from the agency and/or resolve an outstanding issue.
 - b. Language that the agency should continue to comply with any applicable directives regarding the use of grant funds and/or the collection of information.
 - c. Language that the approval of this type of request simply allows the COPS Office to keep a grant active to review circumstances, collect information, etc., and is not meant to imply that any other extension request by the agency will be approved.
2. Standard extension documentation procedures should be followed as outlined in Section VI.

IX. Special Circumstances

Final Approvals

A final extension approval is similar to a regular extension approval in that it honors the grantee's request for more time. However, it also notifies the agency that any further extension requests submitted for the award in question will not be considered/approved. Use of the final extension approval letter requires approval by the Assistant Director for the program office/team or his/her designee.

Unless otherwise approved by the Assistant Director, an agency may be considered eligible to receive a notice of final approval when they request/require an amount of time greater than the original grant award period (cumulative of all past and present extension requests), and/or in situations where the agency appears to be submitting unnecessary, extraneous extension requests. For example, for a three-year grant, if an agency requests more than three additional years in extensions, they may be considered eligible to receive a notice of final approval. [Please note that

_____ for grantees that request an amount of time greater than the original grant award period. Rather, this timeframe is a minimum threshold, and the final approval option can be considered as an option for agencies that exceed it.]

Rescinding Previously Approved Extensions

In general, the COPS Office cannot rescind an approved extension except when it was granted for a specific administrative reason which warrants such an action (e.g., to resolve an audit or compliance issue). For COPS to rescind a previously approved extension, an agency must submit a letter on department letterhead, signed by the top law enforcement executive or government executive, that includes the following:

1. Identification of the specific grant (i.e., grant number and program) for which they would like to have an approved extension rescinded.
2. A brief justification for their request (i.e., why it is necessary).
3. The revised end date that the agency would like for their award.

Requests to rescind a previously approved extension will be processed on a case-by-case basis, and the program office/team will coordinate with the appropriate Finance Division staff to ensure that there are not any discrepancies between the newly proposed end date and the agency's drawdown of funds. Otherwise, the basic procedure for processing a request to rescind an extension is identical to those for processing a normal extension, as outlined in Sections V and VI of this document.

Approving Extension Requests After the Official Grant Expiration Date

In some rare instances, it may be necessary to approve an extension after the grant has expired. For all such requests, a memo approving the request shall be written and signed by the AD for the appropriate program office/team. This memo shall accompany the approval letter sent to the Financial Analyst that oversees IFMIS obligations, and a copy shall be sent to the grant file with all other necessary documentation as required.

Approved: _____ **Date:** 1/25/07
Not Approved: _____ **Date:** _____



**U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
COPS Extension Request Form**

OMB Approval Number: 1103-0093

Date:

The following COPS [grant program type] grant/cooperative agreement is currently set to expire on 6/30/06:

ORI #: AL06301	[Full-time Officers Awarded: 4]	Project Start Date: 7/01/03
Grant #: 2002UMWX1110	[Part-time Officers Awarded: 0]	Original Project End Date: 6/30/06
[Supplement #: 2]	Federal Funds Awarded: \$251,250.00	

SECTION I: This Extension Request Form will allow your agency the opportunity to request a “no-cost” time extension in order to complete the federal funding period and requirements for the grant/cooperative agreement award listed above. Requesting and/or receiving a time extension will not provide additional funding. Please read the enclosed “Frequently Asked Questions” document for more information on extending your grant/cooperative agreement.

A. Please select the option below that best meets your agency’s needs:

[NOTE: If the extension request you indicate below (or a combination of the current request and a previously approved extension for this award) exceeds [18] months from the original end date of this grant, you are required to complete Section II on the following page(s).] Months this award has already been extended: [0]

- An extension is NOT needed; we will complete the grant/cooperative agreement by the current end date.
- [A 6-month extension is needed. (You are [not] required to complete Section II.)]
- [A 12-month extension is needed. (You are [not] required to complete Section II.)]
- [An 18-month extension is needed. (You are [not] required to complete Section II.)]
- [For requests of more than 18 months, provide a new end date: ___/___/___ (You are required to complete Section II.)]

Please check the reason(s) below that best describe why this extension is being requested (check all that apply):

- Hiring delays (initial hiring delays, extended vacancies, lack of qualified candidates, scheduled academy, etc.).
- Equipment delays (procurement, requests for proposals, installation difficulties, testing/training, not fully operational, etc.).
- Administrative delays (change in executives/administration, delay in accepting award, environmental assessments, etc.).
- Delays in implementing applied research project.
- Other (please explain): _____

B.

			/ /
Printed Name of Requester	Title of Requester	Signature of Requester	Date Signed

- C. Indicate any change to the agency information listed below (Chief, Sheriff, Program Official, phone number, etc.).
- D. Return this request to us via fax at (202) [XXX-XXXX] or mail the completed form(s) to COPS at the address listed below:

U.S. Department of Justice, COPS Office
1100 Vermont Avenue, N.W.
Washington, DC 20530 [20005 if using an overnight carrier]
Attn: [Program Team] Control Desk

<p>Current Agency Information Listed in COPS Files:</p> <p>[Law Enforcement Executive]: Chief Kenneth Smith Legal Name: Tuscaloosa, City of Address 1: 3801 Mill Creek Road Address 2: City/State/Zip: Tuscaloosa, AL 35401 Phone #: 205-349-0504 Fax #: 205-349-0174</p>	<p>Changes to COPS Current Agency Information:</p> <p>[Law Enforcement Executive]: Legal Name: Address 1: Address 2: City/State/Zip: Phone #: Fax #:</p>
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SECTION II: JUSTIFICATION FOR AMOUNT OF TIME REQUESTED

If the amount of time you requested in Section I indicated that you must complete Section II, please respond to the questions below. Please respond as thoroughly and completely as possible. **Failure to answer all questions thoroughly could delay processing of your extension request, or result in your request being denied.**

If additional space is needed to answer the questions below, please continue your response on department letterhead.

A. Please use the space below to explain the specific issues or problems that have caused delays in the implementation and/or completion of this grant/cooperative agreement. Additionally, please explain how your agency intends to address the delay(s) in order to complete this grant/project.

B. *For each position* under this specific grant that **has not** yet completed the full 36 months of federal funding, you are required to provide us with the information requested below. Be sure to include any positions that have never been filled under this grant. Use the format below for your response.

Step 1: Indicate the type of position (full or part-time) for which 36 months of funding has not yet been expended.

Step 2: In the "Total Months Under Grant" column, indicate the total amount of time, in months, that the position has been filled from the grant award start date to present. If multiple officers have held a COPS-funded position due to turnover, please determine the cumulative number of months for all officers that have been employed in that position, and then indicate that total amount of time as a single figure.

Step 3: Indicate if the position listed is currently filled.

Step 4: If a position is currently vacant, please provide us with an expected hire date.

Step 5: Repeat steps 1-4 as needed for each additional position under this grant that has not utilized 36 months of funding.

	<u>Type of Position</u>	<u>Total Months Under Grant</u>	<u>Position Currently Filled?</u>	<u>Expected Hire Date*</u>
Example:	Full-Time	24	Yes	N/A
	Part-Time	10	No	10/1/06
Your Agency:	_____	_____	_____	_____
	_____	_____	_____	_____
	_____	_____	_____	_____

Reminder: If you do not intend to fill a position in the near future, you may wish to consider a grant modification or withdrawal to eliminate that position. Additionally, your agency is entitled to a maximum of 36 months of grant funding for each position awarded. At the conclusion of this period, your agency must implement the retention period for each awarded position using local funds.

B.

In the space below, please provide a new timeline that reflects when your agency plans to complete any steps or phases of the project that are not currently finished. This timeline should be in a monthly format, and indicate up to the newly requested end date what tasks your agency will be working on. During months in which you anticipate no activity taking place, please indicate that as well.

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to be up to one half-hour per response, depending upon the COPS program being extended, which includes time for reviewing instructions. Send comments regarding this burden estimate or any other aspects of the collection of this information, including suggestions for reducing this burden, to the COPS Office; and to the Public Use Reports Project, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

LE Executive/Program Official
Agency Name
Agency Address 1
Agency Address 2
City, State Zip

RE: <<Program Name>> <<Grant/Cooperative Agreement #>>, <<Supplement #>>
ORI: ZA22222

The <<COPS in Schools>> program grant/cooperative agreement <<grant#/cooperative agreement #>> listed above is scheduled to expire in the near future. Attached is the COPS Extension Request Form, which allows your agency to request a no-cost time extension if additional time is needed to complete program requirements. Please review this form carefully, and refer to the enclosed Frequently Asked Questions for additional guidance on requesting an extension. It should be noted that an extension, if approved, is for the sole purpose of providing your agency with additional time to complete program requirements, and does not provide any additional funding.

Should you determine that a no-cost time extension is needed for your <<CIS>> <<grant/cooperative agreement>>, simply complete and return the attached form to the COPS Office prior to the end date of the grant listed on the form. Please be sure to complete all required sections as indicated on the form, as an incomplete form may delay the processing of your request, or result in it being denied. Extension requests are evaluated on a case-by-case basis, and the COPS Office reserves the right to deny any extension request; therefore, your agency should consider this information carefully and request only the amount of time your agency needs to complete the grant requirements.

Please be advised that if your extension request is not received by the grant end date, the COPS Office will be unable to extend your grant/cooperative agreement, and it will then be considered eligible for financial and programmatic closeout. Additionally, please note that 28 CFR. § 66.50(c) requires grantees to submit a final Financial Status Report SF-269A and draw down funds for incurred costs within 90 days after the end date of the grant/cooperative agreement. If remaining funds are not drawn down within 90 days after the grant end date, your agency will forfeit the remaining eligible balance.

We thank you for your continued support of the COPS Office and its programs. If you have additional questions, please do not hesitate to contact the COPS Office Response Center at 1-800-421-6770.

Sincerely,

<<Insert AD name>>
<<Insert AD title>>

Enclosures: COPS Extension Request Form
Frequently Asked Questions



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

LE Executive/Program Official
Agency/Legal Name
Address 1
Address 2
City, State Zip

Final Notice – Grant/Cooperative Agreement Expiration

RE: <<Program Name>> Grant/Cooperative Agreement #, <<Supplement #>>
ORI: ZA22222

Dear <<LE Executive/Program Official>>:

The COPS Office is sending your agency this notice as a *final* reminder that the aforementioned grant/cooperative agreement for <<\$\$\$\$\$\$\$\$>> in federal funds expires on <<December 31, 2005>>.

On <<date mailed>>, the COPS Office mailed your agency the COPS Extension Request Form to provide your agency with the opportunity to extend this grant/cooperative agreement. As of the date of this letter, we have not received a completed COPS Extension Request Form from your agency. Should your agency require an extension for this grant/cooperative agreement, please return this form to the COPS Office by <<15 day prior to end date>> to allow sufficient time for processing the request prior to your grant expiration date. We have included a copy of the COPS Extension Request Form for your convenience. If your agency does not need additional time, or if you sent a completed Extension Request Form to the COPS Office after the date of this notice, please disregard this letter.

If your agency submits a request form, be sure to complete all required sections as indicated, as an incomplete form may delay the processing of your request, or result in it being denied. Extension requests are evaluated on a case-by-case basis, and the COPS Office reserves the right to deny any extension request; therefore, your agency should consider this information carefully and request only the amount of time your agency needs to complete the grant requirements. It should be noted that an extension, if approved, is for the sole purpose of providing your agency with additional time to complete program requirements, and does not provide any additional funding.

Please be advised that if your extension request is not received by the grant end date, the COPS Office will be unable to extend your grant/cooperative agreement, and it will then be considered eligible for financial and programmatic closeout. Additionally, please note that 28 CFR. § 66.50(c) requires grantees to submit a final Financial Status Report SF-269A and draw down funds for incurred costs within 90 days after the end date of the grant/cooperative agreement. If remaining funds are not drawn down within 90 days after the grant end date, your agency will forfeit the remaining eligible balance.

We thank you for your continued support of the COPS Office. If you have any additional questions, please do not hesitate to contact the COPS Office Response Center at 1-800-421-6770.

Sincerely,

<<Insert AD name>>

Recommendation 5 – Attachment 1c

<<Insert AD title>>

cc: Grant File
Office of the Comptroller



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

LE Executive/Program Official
Agency Name
Agency Address 1
Agency Address 2
City, State Zip

RE: Extension request for <<Insert program name>> Grant # <<Grant Num>>
ORI #: <<ORI #>>

Dear <<Insert LE executive name>>:

I am pleased to inform you that your extension request for the COPS grant listed above has been approved. This approval provides your agency with additional time to meet programmatic requirements and complete the drawdown of funds. Your new end date is <<Insert new end date>>.

Based on the amount of time already given to your agency to complete programmatic and administrative requirements for the grant listed above, please be advised that barring unforeseen circumstances, this is the *final* extension that the COPS Office will provide your agency to complete the grant. The COPS Office may not consider future requests for additional time beyond the end date listed above, and accordingly, costs incurred after <<end date>> will not be considered eligible for reimbursement. Therefore, the COPS Office strongly encourages your agency to complete the grant in the time provided.

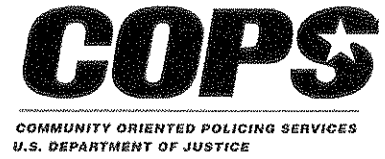
Additionally, please note that 28 CFR. § 66.50(c) requires grantees to submit a final Financial Status Report SF-269A and draw down funds for incurred costs within 90 days after the end date of the grant/cooperative agreement. If remaining funds are not drawn down within 90 days after the grant end date, your agency will forfeit the remaining eligible balance.

We thank you for your continued support of the <<Insert program name>>. If you have any questions regarding your extension, please feel free to contact the COPS Office Response Center at 1.800.421.6770.

Sincerely,

<<Insert AD name>>
<<Insert AD title>>

cc: Grant File
Office of the Comptroller



Frequently Asked Questions about the COPS Extension Request Form

What is the Extension Request Form, and why did I receive it?

You have received the COPS Extension Request Form, which is sent to COPS grantees approximately 90 days prior to the expiration of their grant or cooperative agreement. It is quite common for agencies to experience project implementation delays during the course of their grant. The COPS Extension Request Form allows your agency to request a “no-cost” time extension to compensate for such delays and complete the necessary grant requirements.

Will this form provide my agency with additional grant funds?

No. Completing the COPS Extension Request Form will not provide your agency with additional federal funds. Rather, the form allows your agency to request additional time to complete grant requirements and expend existing funds on allowable costs for the grant specified on the form.

How much additional time should I request?

Begin by calculating how much more time is needed to fully complete the necessary programmatic and/or financial requirements for your grant/cooperative agreement. Once you have determined how much additional time your agency will need, simply fill in the oval on the Extension Request Form that best corresponds to that amount of time. Please be sure to complete ALL required sections as indicated on the form, as an incomplete request may delay the processing of your request, or result in it being denied. Next, mail or fax the form back to the COPS Office prior to the end date listed on the form. **Please be advised that if your extension request is not received by the award end date, the COPS Office will be unable to extend your grant, and the grant will then be considered eligible for financial and programmatic closeout.**

I am required to complete Section II on the COPS Extension Request Form. What information should I include?

Section II requires your agency to provide the COPS Office with details about the project implementation delays your agency has experienced, as well as an implementation timeline for the remainder of your grant. To avoid delays in processing your extension request, please be as clear and specific as possible in your responses. Please note that the COPS Office reserves the right to deny any extension request for failure to make satisfactory progress with respect to grant implementation.

My agency has completed the grant/cooperative agreement, but we still have federal funds remaining. What should I do?

Grantees are allowed a maximum of 90 days after their grant expiration date to make any *final* drawdown for approved costs incurred during the *active* grant period. If funds still remain in your account after your final drawdown, simply leave them in the account and they will be de-obligated when the COPS Office closes your agency’s grant.

I still have questions about requesting an extension for my grant/cooperative agreement. What should I do?

If you have any additional questions regarding the Extension Request Form that you received, please feel free to contact your COPS Program Manager at 1.800.421.6770. Our staff will be happy to assist you.

8/14/06



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

LE Executive/Program Official
Agency Name
Agency Address 1
Agency Address 2
City, State Zip

RE: Extension request for <<Insert program name>> Grant # <<Grant Num>>
ORI #: <<ORI #>>

Dear <<Insert LE executive name>>:

I am pleased to inform you that your extension request for the COPS grant listed above has been approved. This approval provides your agency with additional time to meet programmatic requirements and complete the drawdown of funds. Your new end date is <<Insert new end date>>.

Please note that 28 CFR. § 66.50(c) requires grantees to submit a final Financial Status Report SF-269A and draw down funds for incurred costs within 90 days after the end date of the grant/cooperative agreement (provided in the above paragraph). If remaining funds are not drawn down within 90 days after the grant end date, your agency will forfeit the remaining eligible balance.

We thank you for your continued support of the <<Insert program name>>. If you have any questions regarding your extension, please feel free to contact the COPS Response Center at 1.800.421.6770.

Sincerely,

<<Insert AD name>>
<<Insert AD title>>

cc: Grant File
Office of the Comptroller



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

LE Executive/Program Official
Agency Name
Agency Address 1
Agency Address 2
City, State Zip

RE: Extension request for <<Insert program name>> Grant # <<Grant Num>>
ORI #: <<ORI #>>

Dear <<Insert LE executive name>>:

This letter is being sent in response to an extension request submitted by your agency for the grant listed above. I regret to inform you that your extension request has been denied. Therefore, the official end date for your agency's grant remains <<Insert new end date>>.

The COPS Office carefully reviews each extension request to ensure that sufficient and sustained progress is being made toward project goals. Several factors are taken into consideration during the review of an extension request, including the amount of the project completed thus far, the number and length of previously approved extension requests, the revised implementation timeline, plans for remedying implementation delays, and other relevant factors. After a thorough review, your agency's request was denied because [provided detailed description/justification/specific reason for the denial of the extension request].

At this time, the COPS Office recommends that your agency [submit a withdrawal, modification, change in scope etc.] To perform this recommended action, your agency should [describe the necessary actions the agency needs to assume in order initiate the recommended action].

Please note that 28 CFR. § 66.50(c) requires grantees to submit a final Financial Status Report SF-269A and draw down funds for incurred costs within 90 days after the end date of the grant/cooperative agreement. If remaining funds are not drawn down within 90 days after the grant end date, your agency will forfeit the remaining eligible balance.

We thank you for your continued support of the <<Insert program name>>. If you have any questions regarding your extension, please feel free to contact the COPS Response Center at 1.800.421.6770.

Sincerely,

<<Insert AD name>>

<<Insert AD title>>

cc: Grant File
Office of the Comptroller



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

VIA FACSIMILE and U.S. MAIL

Government Executive

Agency Name

Agency Address 1

Agency Address 2

City, State Zip

Law Enforcement Executive

Agency Name

Agency Address 1

Agency Address 2

City, State Zip

FINAL NOTICE

RE: Information request for <<Insert program name>> Grant # <<Grant Num>>

ORI #: <<ORI #>>

Dear <<Insert GE title and name>> and <<Insert LE title and name>>:

On <<Insert Date>>, your agency submitted an extension request for the grant referenced above. Unfortunately, the documentation provided was missing important information needed to conduct a complete review of your request. As such, the COPS Office attempted to contact your agency on two separate occasions to gather the necessary information.

Specifically, your request <<Insert short description of missing/contradictory information (e.g., hiring history, timeline discrepancy, etc.)>>. To obtain this information, <<name and title of person contacted>> was contacted on <<insert date of contact>> by [phone/fax], and <<name and title of person contacted>> was contacted on <<insert date of contact>> by [phone/fax]. Unfortunately, both attempts to obtain the necessary information were unsuccessful.

Please be aware that the COPS Office cannot process or complete the review of your extension request until the aforementioned information is provided by your agency. As such, this letter serves as the final contact that will be attempted by the COPS Office with regard to this issue. If your agency wishes to proceed with your extension request, please contact me at <<Insert phone #>> by no later than the close of business on <<Insert date>>.

If the COPS Office does not receive a response from your agency by the date mentioned above, your extension request will be denied, and the grant will expire as originally scheduled on <<Insert grant expiration date>>. **Once your grant has expired, your agency may no longer be permitted to request an extension for this grant.** Following grant expiration, your agency will have 90 days to draw down any funds as reimbursement for approved costs incurred during the grant period. After that time, any remaining grant funds will be considered eligible for de-obligation.

Thank you for your cooperation in resolving this matter. If you have any questions concerning this final request for information, please contact me immediately.

Sincerely,

<<Requestor Name>>

<<Requestor title>>

cc: Grant File
Office of the Comptroller



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

VIA FACSIMILE and U.S. MAIL

Government Executive

Agency Name

Agency Address 1

Agency Address 2

City, State Zip

Law Enforcement Executive

Agency Name

Agency Address 1

Agency Address 2

City, State Zip

NOTICE OF EXTENSION REQUEST DENIAL

RE: <<Insert program name>> Grant # <<Grant Num>>

ORI #: <<ORI #>>

Dear << government exec. name and title>> and << law enforcement exec. name and title>>:

On <<Insert Date>>, your agency submitted an extension request for the grant referenced above. Unfortunately, the documentation provided was missing important information needed to conduct a complete review of your request. As such, the COPS Office attempted to contact your agency on three separate occasions to gather the necessary information.

Specifically, <<name and title of person contacted>> was contacted on <<insert date of contact>> by [phone/fax], and <<name and title of person contacted>> was contacted on <<insert date of contact>> by [phone/fax]. Additionally, both << name and title of government executive>> and <<name and title of law enforcement executive>> were sent a final notice, dated <<Insert date of final notice letter>>, via fax and certified mail. This document notified your agency that additional information was needed to evaluate your request, and required that your agency contact the COPS Office by close of business on <<Insert deadline date from final notice>>. Unfortunately, each prior attempt to obtain the necessary information was unsuccessful.

Because the COPS Office was not able to obtain the information needed to complete our review, we regret to inform you that your extension request has been denied. Accordingly, your grant will expire as originally scheduled on <<Insert grant expiration date>>. **Once your grant has expired, your agency may no longer be permitted to request an extension for this grant.** Following grant expiration, your agency will have 90 days to draw down any funds as reimbursement for approved costs incurred during the grant period. After that time, any remaining grant funds will be considered eligible for de-obligation.

The COPS Office regrets that we were not able to bring this matter to a favorable resolution. If you have any questions concerning this notice, please feel free to contact the COPS Office Response Center at 800.421.6770.

Sincerely,

<<Assistant Director's Name>>

<<Assistant Director's Title>>

cc: Grant File
Office of the Comptroller



MEMORANDUM
U.S. Department of Justice
Office of Community Oriented Policing Services (COPS)
 <<Grants Administration Division>>

TO: [Supervisor/Program/Team Lead]
 FROM: [COPS Staff Member]
 DATE: July 14, 2006
 SUBJECT: <<Insert program here>> Extension Request Denial Recommendation for <<Insert agency name>>,
 <<Insert Grant Num>>, <<Insert ORI Num>>

This memo serves to document contacts made to <<Insert Agency Name>> regarding their extension request for the grant listed above. In their request, dated <<Insert Request Date>>, the agency requested an extension of __ months from their current end date of <<Insert Current End Date>>.

The COPS Office was unable to process the extension request as originally submitted by the agency because <<Insert a short description of the problem with their request>>. To obtain the information needed to evaluate their request, the COPS Office subsequently made contact with the agency as noted below. Unfortunately, the agency was unresponsive to repeated attempts to obtain the missing information. Therefore, consistent with the COPS Standard Extension Policy it is recommended that the agency's extension request be denied, and, absent any contact from the grantee, that the grant be considered eligible for closeout upon expiration.

Record of Contacts:

<u>Date</u>	<u>Type of Contact Attempted</u>	<u>Result of Contact</u>
<<Date of Contact>>	<<phone, fax, cert letter, etc.>>	<<No response, did not send missing info, etc.>>
<<Date of Contact>>	<<phone, fax, cert letter, etc.>>	<<No response, did not send missing info, etc.>>
<<Date of Contact>>	<<phone, fax, cert letter, etc.>>	<<No response, did not send missing info, etc.>>

Denial Recommendation Approved:

Not Approved:

 Signature Date

 Signature Date



U.S. Department of Justice

Office of Community Oriented Policing Services
<<Grants Administration Division>>

1100 Vermont Avenue, NW
Washington, DC 20530

July 13, 2006

LEE Title/name
Agency Name
Address 1
Address 2
City, State ZIP

RE: Extension request for <<Insert program name>> Grant # <<Grant Num>>
ORI #: <<ORI #>>

Dear <<Insert LEE executive name>>:

The Office of Community Oriented Policing Services (COPS) is in receipt of your agency's written request to extend the grant listed above until <<Insert Date Requested>>. When evaluating extension requests, the COPS Office considers a number of factors, including the total length of the award and the level of programmatic progress achieved with the project.

Either your agency did not provide sufficient supporting information about your extension request to the COPS Office prior to your grant expiration date of DATE, or your agency is currently working with the COPS Office to resolve an outstanding issue. COPS staff have been in contact with Title/Name regarding the additional information needed to evaluate your agency's request and/or resolve the issue. We are granting your agency an administrative extension until DATE to enable your agency to provide the documentation requested, and/or to allow the COPS Office time to review and process your agency's extension request.

This extension request, therefore, is solely for the purposes of collecting information and is not indicative of the overall approval of your request. If your agency has been working with a member of the COPS Office to resolve an outstanding issue, you must continue to abide by the directives provided by that individual regarding financial and programmatic implementation until that issue has been resolved.

We thank you for your continued support of the <<Insert program name>>. If you have any questions regarding your extension, please feel free to contact the COPS Office Response Center at 1.800.421.6770.

Sincerely,

<<Insert AD name>>
<<Insert AD title>>

cc: Grant File
Office of the Comptroller

COPS Active Progress Report

PROJECT IMPLEMENTATION STATUS

Hiring Questions

This survey pertains to the <TOTAL # FULL-TIME > COPS officer position(s) awarded under the following grant as of <Last day of the reporting period>.

Grant Program	Grant #	New Hires	Rehires Pre-Application Layoffs	Rehires Post-Application Layoffs
CHRP	2010RKWX0001	5	3	3
CHP	2010RLWX0005	3	0	0

COPS FUNDED OFFICER INFORMATION

1. As of <Last day of the reporting period >, how many COPS grant position(s) were filled?				
Grant Program	Grant #	New Hires	Rehires Pre-Application Layoffs	Rehires Post-Application Layoffs
CHRP	2010RKWX0001	3	2	2
CHP	2010RLWX0005	2	0	0
2. As of <Last day of the reporting period >, how many of the unfilled COPS grant position(s) do you intend to fill?				
Grant Program	Grant #	New Hires	Rehires Pre-Application Layoffs	Rehires Post-Application Layoffs
CHRP	2010RKWX0001	1	1	1
2a. Of the CHRP position(s) that you intend to fill, what is the status of each of these position(s). _____ Recruiting/hiring process has not yet started _____ In the recruiting/hiring process (e.g., career fairs, interviews, background checks) _____ In the training academy				
2b. Of the CHRP position(s) that you intend to fill, what is the expected start date of the position(s). _____ Number of positions scheduled to start in 0-3 months _____ Number of positions scheduled to start in 4-6 months _____ Number of positions scheduled to start in 7-9 months _____ Number of positions scheduled to start in 10-12 months				
CHP	2010RLWX0005	1	0	0
2a. Of the CHP position(s) that you intend to fill, what is the status of each of these position(s). _____ Recruiting/hiring process has not yet started _____ In the recruiting/hiring process (e.g., career fairs, interviews, background checks) _____ In the training academy				
2b. Of the CHP position(s) that you intend to fill, what is the expected start date of the position(s). _____ Number of positions scheduled to start in 0-3 months _____ Number of positions scheduled to start in 4-6 months _____ Number of positions scheduled to start in 7-9 months _____ Number of positions scheduled to start in 10-12 months				

3. As of < *Last day of the reporting period* >, how many of the unfilled grant position(s) are **not going to be filled**?

Grant Program	Grant #	New Hires	Rehires Pre-Application Layoffs	Rehires Post-Application Layoffs
CHRP	2010RK WX0001	1	0	0
CHP	2010RL WX0005	0	0	0

*For the position(s) you do not intend to fill, please contact your Grant Program Specialist at 1-800-421-6770 to discuss a grant modification and/or withdrawal.

Developers Note: This question will only be asked once annually during the 1st calendar quarter in January.

COPS hiring grantees are required to retain all sworn officer position(s) awarded under the Hiring grant with state and/or local funds for a minimum of 12 months at the conclusion of 36 months of federal funding for each awarded position. This means that the retained COPS funded position(s) must be added to your agency's law enforcement budget, over and above the number of locally-funded sworn officer positions that would exist in the absence of the grant. Absorbing your COPS-funded officer positions through attrition (rather than adding extra positions to your budget with additional funding) does not meet the retention requirement.

4. 2010RKWX0001

I certify by checking this box that, as stated in my original grant application, my agency plans to retain the additional sworn officer position(s) awarded under the Hiring grant with state and/or local funds for a minimum of 12 months at the conclusion of 36 months of federal funding for each awarded position.

Please check this box if your agency has any questions about the retention requirement and/or is concerned about your agency's ability to retain the officer position(s) due to fiscal distress or other extenuating circumstances. The COPS Office will contact you to provide you with additional grant implementation assistance. Please provide a brief explanation below of your question or concern.

(please explain in 1000 characters or less):

4. 2010RLWX0005

I certify by checking this box that, as stated in my original grant application, my agency plans to retain the additional sworn officer position(s) awarded under the Hiring grant with state and/or local funds for a minimum of 12 months at the conclusion of 36 months of federal funding for each awarded position.

Please check this box if your agency has any questions about the retention requirement and/or is concerned about your agency's ability to retain the officer position(s) due to fiscal distress or other extenuating circumstances. The COPS Office will contact you to provide you with additional grant implementation assistance. Please provide a brief explanation below of your question or concern.

(please explain in 1000 characters or less):

5. Does your agency require programmatic assistance for the grant(s) listed below at this time to ensure successful implementation of this project?

2010RKWX0001 CHRP	2010RLWX0005 CHP
------------------------------------	-----------------------------------

Yes No Yes No

Developers Note: This question will appear for each "yes" answer above. A grant row will appear for each "Yes" selection.

5a. Please identify what type of programmatic assistance you require.

	Grant Modification Needed	Grant Extension Needed	Community Policing Assistance	Grant Withdrawal Needed	Federal Financial Report Question	Retention Issue	Other
2010RKWX0001 CHRP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010RLWX0005 CHP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Developers Note: If "other" is selected, a text box will appear. Also, add link to FAQ for modification and extension or instructions for completing mod and ext.

CHRP 2009RKWX0001 (please explain in 1000 characters or less):

Non-Hiring Questions

6. During the reporting period, did your agency complete the purchase of all of the equipment, technology, training, background investigations and/or other cost items in your approved project budget?

2010CKWX0123 Technology	2010CKWXK005 CPD
Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>

6a. Please check the reason(s) below that best explains why you have not completed all of your purchases (check all that apply):

Developers Note: This question will appear for each "no" answer above. A grant row will appear for each "no" selection.

	Purchasing in progress	Change in administration	Vendor delays	Procurement issues	Technical issues	Sole Source Approval Needed	Other
2010CKWX0123 Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010CKWXK005 CPD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Developers Note: a text box will appear for each "other" check box selected above.

2010CKWX0123 (please explain in 1000 characters or less): Note: box only appears if "other" selected above

2010CKWXK005 (please explain in 1000 characters or less): Note: box only appears if "other" selected above

7. Has your agency hired all non-sworn/civilian personnel awarded in your approved project budget?

2010CKWX0123 Technology	2010CKWXK005 CPD
Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>

Developers Note: For each "no" response, the agency will receive this question. A grant row should appear for each "no" selection.

7a. Please check the reason(s) below that best describes the hiring status (check all that apply):

	Recruitment / Hiring in Progress	Staff Turnover	Lack of Qualified Candidates	Change in Administration	Temporary hiring freeze	Other
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2010CKWX0123 Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010CKWXK005 CPD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2010CKWX0123 (please explain in 500 characters or less): Note: box only appears if "other" selected above

2010CKWXK005 (please explain in 500 characters or less): Note: box only appears if "other" selected above

8. During the reporting period, has your agency satisfied all the programmatic grant requirements?

2010CKWX0123 Technology	2010CKWXK005 CPD
----------------------------	---------------------

Yes No Yes No

Developers Note: For each "no" response the agency will receive question 8a.

8a. Do you plan to meet the grant requirements and fully implement this grant in subsequent reporting periods?

2010CKWX0123 Technology	2010CKWXK005 CPD
----------------------------	---------------------

Yes No Yes No

Developer Note: For each "no" response, the agency will receive this question:

8a1. Please explain why you do not plan to fully implement this grant (1000 characters or less):

9. Does your agency require programmatic assistance at this time to ensure successful implementation of this project?

2010CKWX0123 Technology	2010CKWXK005 CPD
----------------------------	---------------------

Yes No Yes No

Developers Note: For each "Yes" response to the question above, the agency will receive the next question:

Developers note: A grant row will appear for each "Yes" selection above

9a. Please identify what type of programmatic assistance you require. (Check all that apply):

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Grant Modification Needed	Grant Extension Needed	Sole Source Approval Needed	Community Policing Asst	Grant Withdrawal Needed	Federal Financial Report Question	Consultant Rate Approval Needed	Other

2010CKWX012 3 Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010CKWXK0 05CPD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Developers Note: a text box will appear for each "other" check box selected above. Also, add link to FAQ for modification and extension or instructions for how complete a mod or ext.

2010CKWX0123 (please explain in 1000 characters or less): Note: box only appears if other selected above

2010CKWXK005 (please explain in 1000 characters or less): Note: box only appears if other selected above

Developers Note: This question only applies to the Methamphetamine (Meth) grant program. The question will only appear if the grantee has a 2007 Meth grant.

10. Does your agency currently intend to develop a plan to assess the results of this project?

2010CKWX0123
Meth

Yes No

10a. Please explain why you not plan to assess the results of this project.(1000 characters or less).

Developers Note: This question only applies to certain Cooperative Agreements under the Community Policing Development (CPD) grant program. The question will only appear if certain grantees have a cooperative agreement under the CPD program.

Grant Program	Grant #
CPD	2006CKWXK0005

11. Please discuss the status of each goal and deliverable scheduled to be achieved, as of the reporting period, including any barriers or challenges you have experienced in implementing your project. *(Developers Note: The second sentence will only appear if they have a FY07 and beyond grant.)* In addition, please discuss your progress in evaluating the effectiveness and outcomes of activities implemented as a result of this project, and how this progress is consistent with the COPS Office's mission to advance Community Policing through increasing the capacity of law enforcement agencies to implement community policing strategies.

(Please explain in 2,000 characters or less)

(Please explain in 2,000 characters or less)

Community Policing Capacity

Developers Note: These questions should be asked of all 2007 and later grantees. Questions should be asked once per agency. We will also only ask this section once annually in the January report.

Community Policing

Developers Note: This question asked once per agency

13. Please explain how COPS funding has enhanced your agencies ability to implement community policing activities. (2,000 characters or less).

The questions in this section refer to the grant number(s) identified below and how it may have increased your agency’s community policing capacity.

Grant Program	Grant #	Award Amount
Technology	2010Non-Hiring	\$125,000
	2010Non-Hiring2	\$ 50,000
CHP	2010Hiring	\$130,000
CHRP	2010CHRP	\$130,000

Increasing Community Policing Capacity: Grant Resources

Develop Community/Law Enforcement Partnerships

Developers Note: These questions asked once per agency.

The COPS Office is interested in determining to what extent (if any) your agency’s grant(s) have assisted your agency to increase your capacity to develop collaborative partnerships with individual and organizational stakeholders in the community you serve.

Please use a 10-point scale, where “1” means “Strongly Disagree” and “10” means “Strongly Agree.” If an item does not apply to you please select “N/A.”

14. Has the grant assistance that you received from the COPS Office increased your agency’s capacity to do the following?

P1- Share relevant crime and disorder information with community members.

Strongly Disagree

Strongly Agree N/A

1	2	3	4	5	6	7	8	9	10	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

P2- Actively seek input from the community regarding identifying and prioritizing neighborhood problems.

Strongly Disagree									Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

P3- Engage the community in the development of responses to community problems.

Strongly Disagree									Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

P4- Collaborate with other agencies that deliver public services (e.g., parks and recreation, social services, public health, mental health, code enforcement).

Strongly Disagree									Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Problem-Solving

Developers Note: These questions asked once per agency.

The COPS Office is interested in determining to what extent (if any) your agency’s grant(s) have assisted your agency to increase your capacity to use problem-solving. Problem-solving is an analytical process for systematically 1) identifying and prioritizing problems, 2) analyzing problems, 3) responding to problems, and 4) evaluating problem-solving initiatives. Problem-solving involves an agency-wide commitment to go beyond traditional police responses to crime to proactively address a multitude of problems that adversely affect quality of life.

Please use a 10-point scale, where “1” means “Strongly Disagree” and “10” means “Strongly Agree.” If an item does not apply to you please select “N/A.”

15. Has the grant assistance that you received from the COPS Office increased your agency’s capacity to do the following?

PS1-Integrate problem-solving into patrol work.

Strongly Disagree									Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PS2-Identify and prioritize crime and disorder problems by having officers examine patterns and trends involving repeat victims, offenders, and locations.

Strongly Disagree									Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PS3-Explore the underlying factors and conditions that contribute to crime and disorder problems.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

PS4-Develop tailored responses to crime and disorder problems that address the underlying conditions that contribute to them.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organizational Change

Developers Note: These questions asked once per agency.

The COPS Office is interested in determining to what extent (if any) your agency’s grant(s) have assisted your agency to increase your capacity to transform your agency environment, organizational structure, personnel, practices, and policies to support the community policing philosophy and community policing activities.

Please use a 10-point scale, where “1” means “Strongly Disagree” and “10” means “Strongly Agree.” If an item does not apply to you please select “N/A.”

16. Has the grant assistance that you received from the COPS Office increased your agency’s capacity to do the following?

OC1-Institute organizational changes that support the implementation of community policing strategies.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

OC2-Incorporate community policing principles into your agency’s mission/vision statement and strategic plan.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

OC3-Institutionalize community policing principles into a corresponding set of policies, practices and procedures.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

OC4-Institute community policing agency-wide.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Increasing Technological Capacity (If a technology type of grant is active, show this question)

Developers Note: The technological capacity questions below should only be asked of grantees that have grant program types with equipment/technology grants.

The COPS Office is interested in determining to what extent (if any) your agency's <<program type>> grant(s) have assisted your agency to increase your technological capacity to better prevent and/or respond to crime and disorder incidents.

Please use a 10-point scale, where "1" means "Strongly Disagree" and "10" means "Strongly Agree." If an item does not apply to you please select "N/A."

17. Has the <<program type>> grant assistance that you received from the COPS Office increased your agency's capacity to do the following?

T1- Ensure agency staff have proper access to relevant data (e.g., calls for service, incident and arrest data, etc.).

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

T2- Analyze and understand problems in the community.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

T3- Improve your agency's overall efficiency and effectiveness.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

T4- Provide officers with necessary equipment to better prevent and/or respond to crime and disorder incidents.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Increasing Community Policing Capacity: Training and Technical Assistance Resources

Developers Note: These questions asked once per agency.

The COPS Office is interested in determining to what extent (if any) the COPS Office has provided training or technical assistance to your agency to advance community policing.

18. Have you received training or technical assistance, with respect to implementing community policing, from the COPS Office or COPS-sponsored training providers?

Yes No

Please use a 10-point scale, where "1" means "Strongly Disagree" and "10" means "Strongly Agree." If an item does not apply to you please select "N/A."

Developers Note: If "yes" is selected in the previous question, the agency will receive the following 6 questions:

18a. Has the training and/or technical assistance that you received from the COPS Office increased your agency's capacity to do the following?

Train2- Develop collaborative partnerships with individual and organizational stakeholders in the community.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Train3- Engage in problem-solving to prevent, respond to, and/or better analyze crime.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Train4- Institute organizational changes that support the implementation of community policing strategies.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Train5- Improve technological capabilities to better prevent and/or respond to crime and disorder incidents.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Train6- Effectively implement the strategies presented to better prevent and/or respond to crime and disorder incidents.

Strongly Disagree										Strongly Agree	N/A
1	2	3	4	5	6	7	8	9	10		
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Train7- Did you share the information that you learned with others?

Yes No

19. Do you have any best practices or success stories that you would like to share with the COPS Office related to your community policing activities?

Developers Note: This question asked once per agency.

Survey Feedback

Developers Note: This question asked once per Agency.

20. The COPS Office is committed to continuously improving our processes and systems based upon grantee feedback.

Please rate your overall satisfaction with this online Progress Report.

Highly Dissatisfied										Highly Satisfied
1	2	3	4	5	6	7	8	9	10	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

21. If you have any additional comments regarding using the Progress Report System, please share those comments below.

(please explain in 2000 characters or less):

Certification and Contact Information

Developers Note: This question asked once per agency.

If you would like to provide any additional comments, please feel free to include them below.

Title of Person Completing this Report:

First and Last Name of Person Completing this Report:

E-mail of Person Completing this Report (if applicable):

Phone Number of Person Completing this Report:

<Certification Language> (similar to DAPR)

Please type your name here in place of your signature:

<Paperwork Reduction Act Notice>

<OMB control number and expiration date>

I certify that the information provided on this form is true and accurate to the best of my knowledge and belief. I understand that false statements or claims made in connection with COPS grant awards may result in fines, imprisonment, debarment from participating in Federal grants or contracts, and/or any other remedy available by law to the Federal Government. Please be advised that a hold may be placed on COPS grant awards if it is deemed that the agency is not in compliance with federal civil rights laws and/or is not cooperating with an ongoing federal civil rights investigation.

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