Hem# 8-1c

# City of Carson City Agenda Report

**Date Submitted:** 

July 27, 2010

**Agenda Date Requested:** 

August 5, 2010

Time Requested:

Consent Agenda

To:

Mayor and Supervisors

From:

Carson City Sheriff's Office

**Subject Title:** Action to approve the acceptance of the Office of Criminal Justice Assistance Grant, Regional Gang Initiative in the amount of \$270,281. (Sheriff Furlong)

**Staff Summary:** This grant application will continue the efforts of the Regional Gang Initiative. The program was initially funded in FY10 by the American Recovery and Reinvestment Act through the Nevada Department of Public Safety, Office of Criminal Justice Assistance. The initial award ends 09/30/10. The funding source has changed – this new award is funded directly through the Office of Criminal Justice Assistance. The award will fund one deputy sheriff in each county, as well as one data entry staff person for the Carson City Sheriff's Office for the period 10/01/10 through 06/30/11.

Type of Action Requested: (check of	one)
() Resolution	() Ordinance
(X) Formal Action/Motion	() Other (Specify)
Does This Action Require A Busine	ess Impact Statement: () Yes (X) No

**Recommended Board Action:** I move to approve the acceptance of the Office of Criminal Justice Assistance Grant, Regional Gang Initiative in the amount of \$270,281.00.

Explanation for Recommended Board Action: The Regional Gang Initiative created the foundation for a collaborative response to gang activity within the adjoining tri-county area of Carson City, Lyon County and Douglas County. Carson City Sheriff's Office acts as the fiscal agent. The project is coordinated by a Regional Core Team comprised of the three sheriffs and three district attorneys. This approach was chosen after Sheriff Furlong, Sheriff Pierini and Sheriff Veil held several strategizing sessions to create a collective response to the gang problem plaguing their tri-county region. The initial grant funded one deputy sheriff in each county, as well as one data entry staff person for the Carson City Sheriff's Office. This project was awarded by the American Recovery and Reinvestment Act through the Nevada Department of Public Safety, Office of Criminal Justice Assistance. Funding ends 09/30/10.

**Applicable Statute, Code, Policy, Rule or Regulation:** N/A

**Fiscal Impact:** There is no financial impact to the city for FY11.

**Explanation of Impact:** See above

Funding Sourc Assistance.	e: The funds for this project?	have been o	obtained (	Office of Crin	ninal Justice
Alternatives:	No participation in the grant.				
Supporting Ma	terial: Grant Application				
Prepared By:	Kathie Heath, Business Mana	ger		,	,
(I) (I)	Department Head)  City Manager)  Frust. V. Luus  Pistricy Attornes)  Pinance Director)	The state of the s	Date: _ Date: _ Date: _ Date: _	7/27/1	//0 10 1/10
Board Action T		1)			A 0.1
Motion:		2)			Aye/Nay
(Vote Record	led By)				

# OFFICE OF CRIMINAL JUSTICE ASSISTANCE JUSTICE ASSISTANCE GRANT PROGRAM (JAG)

# Title Page (4 points)

A.	Applicant Agenc	y: <u>Carson City Sheriff's Offi</u>	ce	
B.	Address:	911 E. Musser St.		
C.	Project Title:	Regional Gang Initiative		
D.	Project Period:	From: <u>10/01/10</u>	To: <u>06/</u>	30/11
F.	Authorized Purpo If your County or a apply? Yes	ose Area: (one area only) <u>1. Law</u> City received a direct award, did		ent Programs  f yes, enter amount \$29,775
H.	Project Director	r:		
	Name:	Ray Saylo	Title:	Chief Deputy
	Address:	911 E. Musser St	City/Zip:	Carson City 89701
	Telephone:	(775) 887-2500	Fax:	(775) 887-2026
	E-mail:			
I.	Fiscal Officer:			
	Name:	Kathie Heath	Title:	Business Manager
	Address:	911 E. Musser St.	City/Zip:	Carson City 89701
	Telephone:	(775) 887-2500	Fax:	(775) 887-2026
	E-mail:	kheath@ci.carson-city.nv.us		
J.	Project Contact	Person:		
	Name:	Ken Sandage	Title:	Captain
	Address:	911 E. Musser St.	City/Zip:	Carson City 89701
	Telephone:	(775) 887-2500	Fax:	<u>(775) 887-2016</u>
L.	E-mail: Federal ID Nur DUNS Number Has agency reg		actor Regis	tration (CCR) database?

# **Previous Byrne Funding:**

Year	Grant Number	Federal \$ Amount
2009		
2008		
2007		
2006		

Current (FY10) year funding - 09-ARRA-04 - \$350,000, expires 09/30/10

# **Budget Summary:**

	Federal \$ Requested
Personnel	\$270,281
Consultant/Contract	
Training	
Supplies/Operating	
Equipment	
Confidential Funds	
TOTAL FEDERAL \$ REQUESTED	\$270,281

#### Certification:

The signature of the authorized official of the agency making application hereby agrees that the project described in this application meets all the requirements of the applicable governing legislation as indicated by the Certifications sections attached; that all the information contained in the application is correct; that there has been appropriate coordination with affected agencies and agrees to comply with all provisions of the applicable grant program including the enhanced reporting requirements. The applicant further understands and agrees that any subgrant award received as a result of this application shall be subject additionally to the grant conditions set forth in the Statement of Grant Award, and the current applicable OCJA Project Director's Manual.

Name: Title:

Ken Furlong

Telephone (775) 887-2500

Sheriff

(775) 887-2026

Date

NOTE: This application is for 9 months only. This will align this grant to the same funding periods as all other JAG awards.

### Part 2. GENERAL OVERVIEW

Perhaps it is the absence of razor-edged barbed wire, but gangs don't acknowledge county lines. Therefore, successful gang suppression operations must also transcend jurisdictional boundaries by using efficient gang intelligence sharing systems, and coordinated law enforcement *regionally*, across county jurisdictional lines.

Recent gang data involving the tri-county area of Carson City, Douglas and Lyon Counties certainly builds the case for thinking regionally. This tri-county region equals less than 8% of the population of Nevada. The Drug Enforcement Administration made 199 arrests throughout the entire state, including many within the tri county region. Additionally, local law enforcement made 159 arrests within the same tri-county area, demonstrating the significant problem with gang drug trafficking in this region. The Tri county region has been a magnet for not only Hispanic gangs, by outlaw motorcycle gangs engaging in rivalry involving violent acts. The Vagos motorcycle gang established a club house on the east end of Carson City, close to the Lyon County border. These gang members reside in Carson City, Lyon County, and Douglas County, but much of the criminal acts occur within the Carson City limits due to the location of the club house creating a central point of operation for the Vagos.

The tri county region has identified over 71 gangs operating within the region. The lack of a comprehensive, easy to use and update gang intelligence sharing system impedes law enforcement's ability to track members across county lines, as well as connect gang activity to the gang members. It is also difficult to avoid duplicate count for accuracy in tracking when members change residences within the three counties continually, not to mention the complications this brings to enforcement and suppression operations.

To ameliorate these barriers to gang suppression in their jurisdictions, Carson City Sheriff Furlong, Douglas County Sheriff Pierini, and Lyon County Sheriff Veil met several times to strategize a regional response to gang activity within their jurisdictions. The result was the Regional Gang Initiative funded through the JAG ARRA. This initiative includes funding for three years to initiate and implement a **Regional Gang Initiative** to 1) improve intelligence sharing by implementing GangNet, a gang information data collection and retrieval communications system, and 2) creating a tri-county, regional law enforcement operations team.

Their first objective was to improve gang intelligence used to support regional gang suppression operations by implementing a reliable, efficient, data collection and retrieval system tracking gang members and gang activity that is interconnected within the tri county region, as well as establishing connectivity with the Washoe County Gang Net. The system will be fully operational by 9/30/10.

Their second objective was to improve and increase the continuum of gang suppression enforcement and coordination in the tri-county area operations through the creation of a Regional Gang Suppression Team comprised of one Gang Officer from each department working as one unit throughout the tri county region. These officers are hired, and performing the duties outlined in the grant.

The Sheriffs acknowledge that controlling gangs requires the assistance of the eyes and ears of all citizens. People often feel powerless and intimidated by the presence of gangs in their

neighborhoods, and don't get involved in making reports out of fear. Therefore, a third objective of the Regional Gang Initiative was to embolden citizens through education and prevention resources. A partnership between the three local law enforcement agencies and the three county prevention coalitions enhanced a climate of zero tolerance for gang activity within the tri-county region communities by: 1) educating citizens about gang activity, 2) providing citizens with safe methods for securing their neighborhoods and reporting gang activity by taking advantage of Neighborhood Watch and Secret Witness resources, and 3) embolden citizens by using media advocacy to keep them updated on successful prosecutions of gang members.

The project uses the Carson City Sheriff's Department as the fiscal agent, and coordinated by a Regional Core Team comprised of the three sheriffs and three District Attorneys. They also found support from two other groups: The multi-agency Gang Suppression Task force made up of over 12 law enforcement agencies from around Northern Nevada, meeting monthly to share information and strategize suppression operations; and the three Prevention Coalitions with multiple agency representation who work together collaboratively on a number of prevention and intervention initiatives throughout the tri-county area.

The funding requested for this second year of operations for the Regional Gang Initiative will focus primarily on continued implementation of Gang Net, and growing local support for local funding through engaging citizens in the process of preventing gangs, and visually seeing change within their community through reduced graffiti, less gang activity, etc. Federal and state funding, once the economy improves is also a possibility by demonstrating the regional approach works in gang suppression and prevention, and is cost effective. The Prevention Coalitions have also made the commitment to assist with grant search and applications.

The success of the Regional Gang Initiative at the end of the three year grant period will be evidenced by:

- 1) an immediate increase in the number of gang members and associates logged into the GangNet regional system due to ease of efficiency, followed by a decrease of 20% from 2008 data from 1,437 in 2008 to 1,150 in 2012 as coordinated communications within the tri-county region result in improved suppression operations.
- 2) A decrease by 20% in gangs active in the tri-county regional area from 124 in 2008 to 100 in 2012. Note: This objective was created for the first year application. Due to the success of the current project, this success rate will be increased to a 25% reduction in active gangs.
- 3) A decrease in graffiti reports, an acknowledged gang member related crime identifier, by 25% from 535 in 2008 to 401 in 2012.
- 4) The number of gang training sessions completed with 75% of participants rating the training as "highly useful and informative", number of new Neighborhood Watch communities established and recorded number of calls to Secret Witness reporting gang activity.

### Part 3. PROBLEM STATEMENT

The Regional Gang Initiative will create a collaborative response to gang activity within the adjoining tri county area of Carson City, Lyon County, and Douglas County.

Carson City, the capital of Nevada, encompassing 146 square miles, is located 20 miles east of Lake Tahoe, and 20 miles south of Reno. Carson City is home to approximately 55,000 people. The residents of Carson City include 63% Caucasian, 24% Latino, 2% Native American, and 11% "other". Over 15% report Spanish is the primary language in the home. Highway 395 running North and South, and Highway 50 going east and west, intersect within the city limits, facilitating significant interstate and intrastate traffic through town. Over the last 20 years Carson City has experienced significant growth which leveled off in the last five years. The period of growth brought changes in housing conditions; 50% of residents do not own their own homes.

The Hispanic gangs in Carson City are growing. The rivalry between them is increasing with escalating violent acts. Of the 494 gang related reports in Carson City during 2008, 97 were acts of violence. As a result of pressure on gangs by the Carson City Sheriff's Dept., gangs are moving into Lyon and Douglas Counties. This makes it nearly impossible to make contact with those members relating to crimes they are still committing in Carson City without regional communication.

Lyon County, to the east of Carson City, continues to grow rapidly. The current population is 54,963, and the numbers reflect 88% Caucasian, 11% Hispanic, and 2.4% Native American. Lyon County includes "pockets" of residential communities west to east from Mound House to Yerington, and going north to Fernley. Stretches of unpopulated areas separate the communities. Lyon County was hit hard by the economic downturn, leaving many people who came for the construction jobs and flourished, unemployed.

The growth rate in Lyon County exceeded the growth in public safety services. Growth of this nature brings families from larger urban areas that have experienced crime, violence and gang involvement. School officials note that some of the youth coming in from these areas are able to influence youth who have grown up in a rural setting and glamorize gang involvement. In 2008, juvenile crime in Lyon County took on a more violent side, with 116 arrests for simple battery and battery with substantial harm or use of weapon; and 6 for possession of a weapon.

The biggest problem according to Sheriff Allen Veil is that most of the gangs are based out of Carson City. Again, the need for continued collaboration is evident.

<u>Douglas County</u> is south of Carson City, and west of Lyon County. Approximately 751 square miles, the population of Douglas County is 52,131. 85% of Douglas County's population is Caucasian, 8% is Hispanic, 2% Asian, and about 2% is Native American, and the balance is "other". Douglas County includes South Lake Tahoe where the majority of the population resides, and the "valley", with a more rural lifestyle. Much of the tax base generated by the tourist industry in the South Lake Tahoe area has been negatively impacted by the recession along with unemployment from lay offs. Again, overall the number of crimes involving known/validated gang members is rising, i.e. battery/assaults, homicide, burglaries, and drug trafficking.

According to the Tri Net Task Force, drug and gang related crime in this tri county area was relatively minimal until the Mexican Nationale Drug Trafficking organizations turned the community

into a "trans shipment hub" for methamphetamine distribution, with connections to Stockton, Sacramento and San Francisco, California. The tri county region equals less than 8% of the population of Nevada. Tri Net made 159 drug arrests regionally last year. The Drug Enforcement Administration made 199 arrests throughout the entire state, including many within the tri county region, demonstrating the significant problem with gang drug trafficking in this region. The Tri county region has been a magnet for not only Hispanic gangs, by outlaw motorcycle gangs engaging in rivalry involving violent acts.

The following table summarizes the gang indicators available in 2009 in the tri county region:

	<del>,</del>		<del></del>
COUNTY	TOTAL # OF GANG	# OF GANG	# OF GANGS OPERATING
	MEMBERS	"ASSOCIATES"*	IN COUNTY
CARCONICITY	146 Adults	142 Adults	
CARSON CITY	44 Juveniles	73 Juveniles	42
LYON COUNTY	40 Adults	111 Adults	49
LYON COUNTY	23 juveniles	46 Juvenile	
DOLLGE ACCOUNTY	257 Adults/ Juveniles(Not	(associates included with	43
DOUGLAS COUNTY	broken out by age)	"members")	
TOTAL	520	372	71 Unduplicated

In addition to the growing number of identified gangs, and gang members, the most accurate crime "predictor" of gang presence in a community is graffiti. Not only do gangs use graffiti to claim turf and make their presence know to other gangs, graffiti is used to intimidate a community as a whole.

The graffiti reports for each county for 2009 are:

COUNTY	# GRAFFITI REPORTS		
	2008	2009	
CARSON CITY	383	353	
DOUGLAS COUNTY	77	198	
LYON COUNTY	75	37	
TOTAL	535	580	

In preparation for the first application, the Carson City, Douglas County and Lyon County Sheriffs, Sheriff Furlong, Sheriff Pierini and Sheriff Veil respectively, held several strategizing sessions to create a collective response to the gang problem plaguing their tri county region. One obstacle to aggressive and coordinated gang suppression had been the lack of an effective intelligence sharing system to assist in identification of gangs, gang members, and gang activity. A second obstacle was, and continues to be, gang transience between the three counties. According to Sheriff Furlong, gang members claim "areas", not just neighborhoods. This encourages the spread of gang affiliation across the tri county area which is difficult for law enforcement to track and suppress. Therefore, this proposal's goal to continue suppression of gang activity will be achieved by 1) refining the implementation of the GangNet Intelligence sharing system, and 2) continuing the Gang Suppression Team: one officer from each jurisdiction, conducting gang suppression, and prevention operations that engage the communities. Success of the Regional Gang Initiative will be measured by 1) an increase in information shared through the GangNet System, 2) 25% decreases in the number of gangs and gang members operating in the tri county region, and 3) a 25% decrease in reports of graffiti.

### Part 4. GOALS & OBJECTIVES

GOAL: Continue the Regional Gang Initiative to suppress gang activity and crimes related thereto in Carson City, Lyon and Douglas Counties through *regional* intelligence-sharing, data collection and retrieval communications system and a tri-county, regional law enforcement operations team.

# Objective 1: (Improve regional gang Intelligence sharing)

The Carson City, Lyon and Douglas County Sheriff's Departments will continue improvement in gang intelligence used to support regional gang suppression operations by implementing a reliable, efficient, data collection and retrieval system tracking gang members and gang activity that is interconnected within the tri county region, as well as establishing connectivity with the Washoe County Gang Net. The system, fully operational by the end of the first year. The success of the gang intelligence data collection and retrieval system will be tracked throughout the three year grant period as evidenced by an immediate increase in the number of gang members and associates logged into the regional system due to ease of efficiency, followed by 1) a decrease of 20% from 2008 data from 1,437 in 2008 to 1,150 in 2012 as coordinated communications within the tri county region result in improved suppression operations, and 2) a decrease by 20% in gangs active in the tricounty regional area from 124 in 2008 to 100 in 2012.

# Objective 2: (Improve coordination of regional gang suppression operations)

The Carson City, Lyon and Douglas County Sheriff's Departments will improve and increase the continuum of gang suppression enforcement and coordination in the tri-county area operations through the continuation of a Regional Gang Suppression Team comprised of one Gang Officer from each department working as one unit throughout the tri county region. Program impact will be measured at the end of the three year grant period through a decrease in graffiti reports, an acknowledged gang member - related crime identifier, by 25% from 535 in 2008 to 401 in 2012.

# Objective 3: (Community engagement in support of zero tolerance for gang activity)

A partnership between the three local law enforcement agencies and the three county prevention coalitions will enhance a climate of zero tolerance for gang activity within the tri-county region communities by: 1) educating citizens about gang activity, 2) providing citizens with safe methods for securing their neighborhoods and reporting gang activity, and 3) embolden citizens by using media advocacy to keep them updated on successful prosecutions of gang members. The success of this objective will be measured by the number of gang training sessions completed with 75% of participants rating the training as "highly useful and informative", number of new Neighborhood Watch communities established, and recorded number of calls to Secret Witness reporting gang activity.

### Part 5. METHODS OF ACCOMPLISHMENT

# Objective 1: (Intelligence improvement)

Activity 1: Establish Gang Net within the tri county region: Gang Net is a gang intelligence-sharing system currently used in Clark and Washoe Counties. Tracking gang members and gang activity can be entered into the system including pictures and reports. Authorized users can then pull up this information to assist in gang suppression operations.

- 1.1.1: The Service Support Specialist for this grant initiative will input all Field Interview data into GangNet as it is received and maintain the information files. This will begin 10/1/10.
- 1.1.2: Develop and implement a data dissemination procedure to ensure the necessary law enforcement entities have current gang member information. This will begin 10/1/10.
- 1.1.3: Make information available to appropriate law enforcement entities for use in multi-agency strategic gang suppression operations coordinated through the Gang Suppression Task Force. *This will begin 10/1/10*.
- 1.1.4: Reporting to local and state entities will occur as required by local agencies well as state offices. Continue with new grant award.
- Activity 2: Train Officers in gang information (gang member and gang activity identification): Training in gang recognition and activity is critical for every officer on the street, not just gang officers. Therefore, the Regional Gang Initiative will ensure all officers in all three jurisdictions have the necessary information to identify gang members and activity, and make the appropriate response.
- 1.2.1: Train all existing and new deputies within four months of hire by using current training in place through the Sheriff's Department of all three jurisdiction law enforcement officers. Training will occur every 4 months w/in grant period in order to keep the field and detention personnel up to date on current gang trends, recent court decisions and related procedural changes.
- 1.2.2: On going gang intelligence updates: The Gang Suppression Task Force made up of multiple law enforcement agencies will meet monthly. Minutes of meetings are sent to all Task Force members, and the three Sheriffs. Occur every month for remaining 24 months
- 1.2.3: The first Northern Nevada Gang Symposium was held in October, 2008 with over 225 sworn officers attending. The response was so positive that another Symposium providing advanced intelligence training in October, 2009 with 155 in attendance. The Symposium is for sworn officers only, and provides the newest information available on regional gang activity. Occur each remaining year of the grant in October for two symposiums.

### Objective 2: (Suppression)

Activity 1: Create Uniformity in Regional Gang Initiative Operations across county lines: In order to ensure clear understanding of duties, supervisory and enforcement operations and responsibility between the three jurisdictions, it is important that all policies and procedures associated with the Regional Gang Initiative are in place prior to implementation.

- Activity 1: Regional Gang Initiative Officers will perform gang suppression/prevention operations: Officers assigned to the Gang Initiative Team will perform mostly suppression operations, but will also be engaged in prevention strategies as well.
- 2.2.1: The Regional Gang Initiative officers will work together as a team throughout the tri-county region performing suppression operations. The enforcement authority will cross county lines for each of the officers. Officers will complete investigations, follow up on intelligence leads, conduct surveillances (unmarked vehicles) and patrol (marked and unmarked vehicles) specific areas or neighborhoods identified as having gang activity. Suppression activities will also involve field interviews, executing search and arrest warrants, "knock and talk" activities, interventions and/or arrests will occur. Continue with new grant award.

# Objective 3: (Community Engagement)

- Activity 1: Conduct educational programs for local citizens in gang recognition/prevention. Lack of understand about gangs and gang member recognition is a concern issued by many parents, teachers and other community members.
- 3.1.1.: Schedule and advertise neighborhood-based and school based Gang Education Sessions modeled after the evidence-based training. Officers within each jurisdiction will be trained to present the program. Target one every 2 months of the grant period.
- Activity 2: Involve local citizens in gang prevention: Giving citizens the ability to be the eyes and ears of the community assisting law enforcement is a critical intervention tool.
- 3.2.1: Increase use of Secret Witness by community citizens. The three, local prevention coalitions are working with the Regional Gang Initiative to disseminate flyers in English and in Spanish presenting the Secret Witness hotline both the school-based and the community based lines, and assuring calls are anonymous and offer rewards. Information will be disseminated through school flyers, hand outs at community events, and articles in the newspaper. Continue throughout grant period with new grant award.
- 3.2.2: Provide information on implementing Neighborhood Watch program to bond neighbors together to protect one another. Prevention Coalitions assist with advertising of training opportunities in their neighborhoods, and officers in each jurisdiction will be trained to conduct the sessions which present the advantages of being a Neighborhood Watch community. Continue as often as scheduled throughout the grant period.
- Activity 3: Track and use media advocacy to support prosecutions: Knowing the gang members are held accountable for their actions emboldens community members, raises confidence, and imbeds zero tolerance messages within the community.
- 3.3.1: The Partnership Carson City created a link on their website serving all three jurisdictions that will be the Gang Prosecution Watch Link that will update citizens on cases involving gang members. Continue with new grant award.

### Part 6. EVALUATION OF PROJECT

The process evaluation measures are identified to assess the success of project objectives believed necessary in achieving the project goal. More important, this project includes four, pre and post project impact evaluation measures to assess whether the program goal of measurable gang suppression within the tri-county region was achieved:

- 1) Decrease in number of gang members/associates residing within the tri county region by 20% from 2008 figures by the end of the three year grant period. (Objective 1: Improved gang Intelligence);
- 2) Decrease in number of gangs identified as active in the tri county region by 20% from 2008 figures by the end of the three year grant period. (Objective 1: Improved Gang Intelligence);
- 3) Increase by 20% the number of known gang members prosecuted from 2008 figures by the end of the three year grant period. (Objective 2: Gang Suppression);
- 4) Decrease in number of graffiti incidences correlated to gang activity by 25% from 2008 figures by the end of the three year grant period. (Objective 2: Community Engagement).

Collection of this data does not require a professional evaluator, only the ability to collect the data and draw the comparison table. Graffiti and known gang member prosecutions are currently collected. The number of known gang members and different gangs operating in a given area are collected, but it is anticipated that data collection system will be improved as one of the objectives of this grant proposal. The Data Entry staff person hired through this grant will be responsible for the collection of this data in the tri county region.

Once the four data tables are completed, they will be reviewed by the Northern Nevada Gang Suppression Task Force to determine what other variables in addition to the Regional Gang Initiative may have impacted any change in the pre/post data. For example, changes in local economy and job availability, or new vocational training opportunities. All of these examples are known to reduce gang membership. Or, a new sheriff may bring new attitudes about gang suppression positively or negatively impacting gang activity in a community. All possible variables must be openly considered to ensure the Regional Gang Initiative is evaluated honestly, and conclusions drawn on the project success or failure hold up under scrutiny for validity and reliability.

The third objective of this proposal focusing on community engagement will also be evaluated through the number of new Neighborhood Watch communities created, and an increase in calls to the Secret Witness lines that relate to gang activity. The community gang training classes conclude with a participant evaluation sheet of the class. Number of participants attending each class will be tracked as well as why they came: parent, professional, interested/concerned citizen. We will be able to summarize how helpful and participants felt the information was, as well as recommendations for improvement. It is anticipated that these three activities will result in the community increasing reporting of graffiti initially, and then a decline as gangs understand the "eyes of the community are upon them."

Ultimately, and practically speaking, the level of success for the Regional Gang Initiative can be determined by the willingness, or lack thereof, of the community to continue the program with local dollars at the end of the three year grant period based on their perception of safety as it relates to gangs in their communities.

### Part 7: SUSTAINMENT OF PROGRAM

Ensuring the data outlined in the previous section demonstrating the effectiveness in suppressing gang activity is clearly documented and communicated is imperative to any effort put towards sustaining this initiative. We must be able to prove that the Regional Gang Initiative is working, and worthy of continuing- as we anticipate.

Four strategies that will be explored to maintain the Regional Gang Initiative beyond the three year grant period are:

- 1) Although we are currently in an economic downturn that has dramatically impacted the local economy in this tri county region, recovery within three years is anticipated. If that is indeed the case, the hard evidence of success of this initiative will support the case for local financial assistance for continuation. Additionally, the third objective outlined in this proposal, community engagement, creates a strong connection between the community and law enforcement. The community gang education classes, training in Secret Witness and Neighborhood Watch, and the media advocacy highlighting successes in prosecution and gang related crime reduction will generate citizen support for the inclusion of the Regional Gang Initiative in local budgets because they have been involved in this effort. They own it.
- 2) The Nevada Governor's Working Group on Methamphetamine documented the connection between meth distribution and gangs statewide, but particularly in Clark County and this tri county region. Therefore, this builds a case for state funds committed to regional gang teams such as this model to reduce the distribution of methamphetamine and other substances trafficked by gangs such as heroin and cocaine. This proposal can be brought before the 2011 legislature for consideration by the Sheriff's and Chiefs Association if they chose to do so.
- 3) In the continuum of substance abuse and crime: prevention, intervention, treatment and suppression, law enforcement has recently been recognized as playing a critical role in not only the obvious, suppression, but in prevention as well. A visible, consistent and effective law enforcement presence in a community is one of the most critical prevention tools. Therefore, prevention funding that in the past has been limited to education and positive alternative activities, now includes supporting law enforcement operations as part of an overall "environmental strategy". As a result, the three county Prevention Coalitions are able to include funding for law enforcement operations such as this in their community prevention plans, and will do so as funding is available.
- 4) Finally, the usual "fall back" sustainability plan if all else fails: The three law enforcement agencies will continually monitor grant opportunities as they become available. All three subscribe to numerous sites that routinely broadcast federal funding announcements. Applications as appropriate will be submitted.

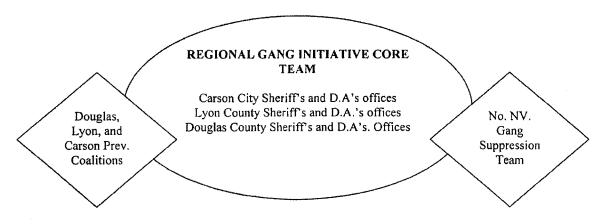
### Part 8: STATEMENT OF COORDINATION

The three law enforcement agencies and district attorney offices associated with the three areas: Carson City, Douglas and Lyon Counties will comprise the core team coordinating the Regional Gang Initiative. The Carson City Sheriff's Office will operate as the fiscal agent for this initiative and be responsible for all state reporting. This core team will be responsible for creating strong connections across the continuum of gang suppression, from the street operations to the court room. Memorandums of Understanding will be signed to demonstrate the uniformity of policies and procedures across the three jurisdictions by the three law enforcement agencies. The three District Attorneys already have such an agreement in place, called "No Safe Haven", which creates information sharing and similar prosecution practices targeting drug dealers and gang members.

Note: Of particular interest is the possible inclusion of adjoining jurisdictions, including those across state boundaries, in a broader, regional initiative. This dialog will be continuing throughout this grant year.

The Core team will have intelligence and strategic planning support from the Northern Nevada Gang Suppression Team, meeting monthly, and chaired by Lt. Mark Smith with the Department of Public Safety. The Gang Suppression Team includes the Tribal law enforcement, Alternative Sentencing, Parole and Probation, the Department of Corrections, Juvenile Probation and over twelve local law enforcement agencies.

The three prevention coalitions within this targeted region Partnership Carson City, Healthy Communities Coalition of Lyon County, and Partnership of Community Resources in Douglas County, will engage in planning sessions with one another to create media advocacy strategies engaging the community in support of the regional Gang Initiative. This will include links on their websites for gang arrest and prosecution updates as possible. Additionally, the coalitions will assist in coordinating the local gang training classes, Secret Witness and Neighborhood Watch advertising and implementation.



# **BUDGET SUMMARY**

# TOTAL GRANT REQUEST (federal funds)

\$270,281

Category	Request \$
Total Personnel Costs	\$270,281
Total Consultants/Contract Services	
Total Travel / Training Costs	
Total Supplies / Operating Costs	
Total Equipment	
Total Confidential Funds	
Total Federal Funds Requested	\$270,281
Match (not required) *	
Total of Project	\$270,281

<sup>\*</sup>Although match is not required, you can show what will be contributed toward your program. This will not influence whether or not you receive a grant award.

# BUDGET REQUEST AND JUSTIFICATION FORM

**PERSONNEL COSTS:** Detail all salaries and wages required for program activities to be paid for by this request for funding. **Maximum OT is 32 hours/month/employee.** 

SAPARIES AND WAGES

2 STATE OF VIEW	AGED				γ
	Annual	% of time	# of OT	Is position a	Total
	Salary or	working on	Hours	New Hire?	FEDERAL \$
Position Title	\$/hour	grant	1	(Y/N)	Requested
Deputy Sheriff	\$43,327	100%		N	\$43,327
(CCSO)			ļ	<u>.</u>	
Overtime	\$4,581		113		\$4,581
Support Specialist (CCSO)	\$26,956			N	\$26,956
Deputy Sheriff (DOUGLAS)	\$46,173	100%		N 	\$46,173
Overtime	\$3,750		83		\$3,750
Deputy Sheriff (LYON)	\$41,828	100%		N	\$41,828
Overtime	\$4,525		113		\$4,525
				<u> </u>	<u> </u>

Sub-Total Personnel \$171,140

**PAYROLL TAXES AND FRINGE BENEFITS:** (Rate x Amount = Request) Fringe benefits should be based on actual known costs or an established formula. Fringe benefits are only for the percentage of time devoted to the project. Complete subcategory total. Detail all payroll taxes and fringe benefits on the appropriate lines.

FRINGE BENEFIUS		\$ Requested
UNEMPLOYMENT INS	\$228	\$228
WORKERS' COMP	\$14,071	\$14,071
GROUP INS	\$29,383	\$29,383
PERS	\$51,031	\$51,031
UNIFORM ALLOWANCE	\$2,100	\$2,100
MEDICARE	\$2,328	\$2,328
Sub-Total Fringe Benefits		\$99,141
TOTAL PERSONNEL		\$270,281

**CONSULTANTS/CONTRACT SERVICES:** (Time Needed x Rate = Requirements) List all consultant/contract personnel in order of priority need. (Consultant travel and expenses should be included in this section.) Remember to list the rate and times for each consultant.

Name	Hourly Fee	# of Hours	Sole Source Contract?	Amount Requested
Sub-Total Contracts				\$(

CONSULTANT EXPENSES: N	Must follow federal/state GSA travel policy and per diem rates.			
Travel	Per Diem	Airfare	Ground Transportation	Amount Requested
Place:				
Purpose:				· · · · · · · · · · · · · · · · · · ·
Sub-Total Expenses				\$0
TOTAL CONSULTANT				\$0

TRAVEL COSTS: The location and purpose of travel should be provided. Per diem (meals & lodging) and mileage are included in travel. Per mile cost and per diem rates should not exceed the current state rates. Current state rates are: mileage \$.585/mile, per diem is set at the federal GSA rates. Go to http://www.gsa.gov for current rates in each city/county. Registration fees/ conference/ training costs should <u>not</u> be listed here. They belong under "Training." Show the basis of computation (i.e., cost per night for lodging x number of nights = total lodging expense).

In State Travel			Estimated	Mileage	Amount
m is mist.	Destination	Per Diem	Airfare	Allowance	Requested
Position Title	Destination	Per Diem	Alliale	Allowance	Requested
					<u> </u>
Sub-Total In-State	Travel		<u>-</u>		\$0

### In-State Travel Justification:

Position Title	Destination	Per Diem	Estimated Airfare	Mileage Allowance	Amount Requested
Sub-Total Out-of-S	tate Travel				SO

# **Out-of-State Travel Justification:**

TRAINING COSTS:	Registration fees/conference/training costs should be included in this section.				
			Titles of		Amount
Training Title	Location	# of Attendees	Positions	Reg Fee	Requested
Sub-Total Training					S0
TOTAL TRAVEL + T	TRAINING				\$0
No more than 3 people	will be approved	to attend the same	training.		
Training Justification	:				

SUPPLIES / OPERATING COSTS: Include in this section requests to support all of the following: telephone, postage, printing and copying, publication, desktop and consumable office supplies, drug testing supplies, and other. For cell phone, include the cost of monthly service and charges by minutes/plan. For printing and copying, include the cost per page and number of pages per month. For desktop and consumable supplies, include the cost per person per month. For drug testing supplies use the average cost per month.

SUPPLYES:		· · · · · · · · · · · · · · · · · · ·	<del>y.</del> ,, , , , , , , ,	
Item	Quantity (per person per month)	Unit Price	Total for year	Amount Requested
		,		
Cab Tradal Complian				\$0
Sub-Total Supplies OPERATING:				<b>.</b>
Your about the same of the sam				
			<u> </u>	

Sub-Total Operating	\$0
TOTAL SUPPLIES + OPERATING	\$0

**EQUIPMENT:** Non-consumable items with a life of one year or more and an acquisition cost of \$500 or more per item (excluding printers) should be listed in this category. Like items or related components must be considered as a group and may not be separated to avoid complying with these standards. Provide a list of all items including number of items, manufacturer, location of item and price per item. Law Enforcement agencies must go through the 1033/1122 Program for equipment purchases but need not receive an estimate for purposes of this application.

Item	Quantity	Unit Price	Total	Amount Requested
				· · · · · · · · · · · · · · · · · · ·
MOTAL POLINAMENT				60

TOTAL EQUIPMENT

\$0

	_		Estimate Portion to	
τ.	Rate per	Total for	be used from	Amount
Item	month	Year	forfeiture funds	Requested
•				
				- 24 A.D. 100-102-103-103-103-103-103-103-103-103-103-103

# **CERTIFICATIONS**

GOVERNING LEGISLATION/POLICIES FOR THIS GRANT PROGRAM:

Edward Byrne Memorial Justice Assistance Grant Program

From the United States Department of Justice, Bureau of Justice and the

Nevada State Department of Public Safety (DPS), Office of Criminal Justice Assistance (OCJA)

The applicant certifies by signing the OCJA grant application title page, that the project described in this application meets all the requirements of the applicable governing legislation as indicated below; that all information contained in the application is correct; that there has been appropriate coordination with affected agencies; and, that the applicant will read, understand and comply with all provisions of the governing legislation and all other applicable federal and state laws, rules and regulations that have been or may hereafter be established. The applicant further understands and agrees that any subgrant award received as a result of this application shall be subject additionally to the grant conditions set forth in the Statement of Grant Award, and in the current applicable OCJA Project Director's Manual.

# STANDARD PROVISIONS

### 1. CHIEF'S APPROVAL

This subgrant award shall not be valid until it has been approved by the Chief of the Office of Criminal Justice Assistance or designee.

### 2. FUND AVAILABILITY.

Financial obligations of the State are contingent upon funds for that purpose being appropriated, budgeted, and otherwise made available.

#### 3. FEDERAL FUNDING.

This subgrant is subject to and contingent upon the continuing availability of federal funds for the purposes hereof.

# **GRANT REQUIREMENTS**

# 1. FINANCIAL & ADMINISTRATIVE MANAGEMENT

- a. The Subgrantee assures that fund accounting, auditing, monitoring, evaluation procedures and such records as necessary will be maintained to assure adequate internal fiscal controls, proper financial management, efficient disbursement of funds received, and maintenance of required source documentation for all costs incurred. These principles must be applied for all costs incurred whether charged on a direct or indirect basis.
- b. All expenditures must be supported by appropriate source documentation. Only actual, approved, allowable expenditures will be permitted.
- c. The Subgrantee assures that it will comply with the provisions of the current applicable OCJA Project Director's Manual. However, such a guide cannot cover every foreseeable contingency, and the Subgrantee is ultimately responsible for compliance with applicable state and federal laws, rules and regulations.

### 2. PAYMENT & REPORTING

- a. OCJA will reimburse the Subgrantee the reasonable and allowable costs of performance, in accordance with current OCJA Office Policies and Nevada State Fiscal Rules, not to exceed the amount specified herein as the Total Award Amount.
- b. The Subgrantee assures that it shall maintain data and information to provide accurate quarterly program and monthly financial reports to OCJA. Said reports shall be provided in such form, at such times, and containing such data and information as OCJA reasonably requires to administer the program.
- e. The Subgrantee assures that quarterly financial reports, narrative reports and quarterly performance measure reports shall be submitted within 20 calendar days of the end of each calendar quarter and shall be current and actual.
- f. The Subgrantee further assures that final financial and narrative reports shall be submitted on the forms provided by OCJA within 45 days of the end date of the subgrant.
- g. OCJA reserves the right to make and authorize modifications, adjustments, and/or revisions to the Grant Award for the purpose of making changes in budget categories, extensions of grant award dates, changes in goals and objectives.
- h. OCJA may withhold payment in the event the Subgrantee fails to comply with conditions and certifications contained in this grant award.

### FEDERAL CERTIFIED ASSURANCES

- 1. FEDERAL PUBLIC POLICY ASSURANCES
- a. The Subgrantee hereby agrees that it will comply, and all of its contractors will comply with the applicable provisions of:
- i. Title I of the Omnibus Crime Control and Safe Streets Act of 1968, as amended;
- ii. The Juvenile Justice and Delinquency Prevention Act and/or the Victims of Crime Act, as appropriate;
- iii. All other applicable Federal laws, orders, circulars, regulations or guidelines.
- b. The Subgrantee agency hereby agrees that it will comply, and all of its contractors will comply with the provisions of 28 CFR applicable to grants and cooperative agreements including:
- i. Part 18. Administrative Review Procedure:
- ii. Part 22, Confidentiality of Identifiable Research and Statistical Information;
- iii. Part 23, Criminal Intelligence Systems Operating Policies;
- iv. Part 30, Intergovernmental Review of Department of Justice Programs and Activities;
- v. Part 35, Nondiscrimination on the Basis of Disability in State and Local Government Services;
- vi. Part, 38, Equal Treatment for Faith Based Organizations;
- vii. Part 42 Nondiscrimination/Equal Employment Opportunity Policies and Procedure;
- viii. Part 61 Procedures of Implementing the National Environmental Policy Act;
- ix. Part 63 Floodplain Management and Wetland Protection Procedures; and,
- x. Federal Laws or regulations applicable to Federal Assistance Programs.
- c. Grantee agrees to comply with the requirements of 28 C. F. R. Part 46 and all Office of Justice Programs policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.
- d. Grant agrees to comply with all confidentiality requirements of 42 U.S.C. section 3789g and C.F.
- R. Part 22 that are applicable to collection, use, and revelation of data or information. Grantee further agrees, as a condition of grant approval, to submit a Privacy Certificate that is in accord with requirements of 28 C. F. R. Part 22 and, in particular, section 22.23.

2. FINANCIAL & ADMINISTRATIVE MANAGEMENT

a. Subgrantee assures that it will comply with appropriate federal cost principles and administrative requirements applicable to grants as follows:

i. For state, local or Indian tribal government entities;

- a) OMB Circular A-87, Cost Principles for State. Local & Indian Tribal Governments
- b) OMB Circular A-102, Common Rule-Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments
- c) 28 CFR 66, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments

ii. For non-profit organizations;

- a) OMB Circular A-122, Cost Principles for Non-Profit Organizations
- b) OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Nonprofit Organizations
- c) 28 CFR 70, Uniform Administrative Requirements for Grants and Cooperative Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations iii. For colleges and universities;

a) OMB Circular A-21, Cost Principles for Educational Institutions

- b) OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Nonprofit Organizations
- c) 28 CFR 70, Uniform Administrative Requirements for Grants and Cooperative Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations
- iv. For each agency spending more than \$500,000 per year in federal funds from all sources;
- a) OMB Circular A-133, Audits of States, Local Governments and Nonprofit Organizations Special Provisions and Certified Assurances

### 3. NON-SUPPLANTING OF FUNDS

- a. The Subgrantee certifies that any required matching funds used to pay the non-federal portion of the cost of this subgrant are in addition to funds that would have otherwise been made available for the purposes of this project.
- b. The Subgrantee certifies that federal funds made available under this grant:
- i. Will not be used to supplant state or local funds;
- ii. Where there is a reduced or unchanged local investment, then the Subgrantee shall give a written explanation demonstrating that the Subgrantee's reduced or unchanged commitment would have been necessitated even if federal financial support under this federal grant program had not been made available.

Agency Authorized Signature:		Date	4/6/2010
Title: City Manager, Ca	rson City		·

U.S. DEPARTMENT OF JUSTICE OFFICE OF JUSTICE PROGRAMS OFFICE OF THE COMPTROLLER

# CERTIFICATIONS REGARDING LOBBYING; DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS AND DRUG-FREE WORKPLACE REQUIREMENTS

Applicants should refer to the regulations cited below to determine the certification to which they are required to attest. Applicants should also review the instructions for certification included in the regulations before completing this form. Signature of this form provides for compliance with certification requirements under 28 CFR Part 69, "New Restrictions on Lobbying" and 28 CFR Part 67, "Government-wide Debarment and Suspension (Non-procurement) and Government-wide Requirements for Drug-Free Workplace (Grants)." The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Justice determines to award the covered transaction, grant, or cooperative agreement.

### 1. LOBBYING

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 28 CFR Part 69, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 28 CFR Part 69, the applicant certifies that:

- (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal grant or cooperative agreement;
- (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure of Lobbying Activities," in accordance with its instructions;
- (c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all sub-recipients shall certify and disclose accordingly.

# 2. <u>DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS</u> (<u>DIRECT RECIPIENT</u>)

As required by Executive Order 12549, Debarment and Suspension, and implemented at 28 CFR Part 67, for prospective participants in primary covered transactions, as defined at 28 CFR Part 67, Section 67.510

- A. The applicant certifies that it and its principals:
  - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of Federal benefits by a State or Federal court, or voluntarily excluded from covered transactions by any Federal department or agency;
  - (b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and (d) Have not within a three-year period preceding this application had one or more public transactions (Federal, State, or local) terminated for cause or default; and
- B. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

### 3. DRUG-FREE WORKPLACE (GRANTEES OTHER THAN INDIVIDUALS)

As required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 67, Subpart F, for grantees, as defined at 28 CFR Part 67 Sections 67.615 and 67.620

- A. The applicant certifies that it will or will continue to provide a drug-free workplace by:
  - (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
  - (b) Establishing an on-going drug-free awareness program to inform employees about
    - (1) The dangers of drug abuse in the workplace;
    - (2) The grantee's policy of maintaining a drug-free workplace;

- (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will
  - (1) Abide by the terms of the statement; and
  - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction:
- (e) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to:

Department of Justice Office of Justice Programs ATTN: Control Desk 810 Seventh Street, N.W., Washington, D.C. 20531

Notice shall include the identification number(s) of each affected grant;

- (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted
  - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:
Place of Performance (Street address, city, county, state, zip code)
Check if there are workplaces on file that are not identified here.
Section 67, 630 of the regulations provides that a grantee that is a State may elect to make one certification in each Federal fiscal year. A copy of which should be included with each application for Department of Justice funding. States and State agencies may elect to use OJP Form 4061/7.
Check if the State has elected to complete OJP Form 4061/7.

# **CERTIFICATION**

Grant Title: Pregional Gang Initiative
Grantee Name: Consolidated Municipality of Carson City, Nevada
Address: 201 N. Carson Street, Suite 2, Carson City, NV 89701
Contact Person: Jennifer Schulz Tel #: 175-887-2103
Grant Number: n/A, application pending Award Amount: n/A
Date and effective duration of EEOP:
Policy Statement:
CERTIFICATION (EEOP ON FILE)
Certification Statement:
I, LAYTH Werner [agency executive officer], certify that the
[agency] has formulated an Equal Employment Opportunity Plan in accordance with 28 CFR 42,391m et seq. subpart E, that it has been signed into effect by the proper agency authority and disseminated to all employees, and that it is on file in the Office of [name],
[address], [title], for review or audit by officials of the cognizant State
planning agency or the Office for Civil Rights, Office of Justice Programs as required by relevant laws and regulations. Note: Carson City is in the process of formulative and updating the EEOP. We will notify the State of Ny Office of Criminal Justice when the document is completed.  Signature  City Hanager Carson City 4 10 10
CERTIFICATION (NO EEOP REQUIRED)
I HEREBY CERTIFY THAT THE FUNDED AGENCY HAS LESS THAN 50 EMPLOYEES AND, THEREFORE, IS NOT REQUIRED TO MAINTAIN AN EEOP, PURSUANT TO 28 CFR 42.301, ET SEQ.
Signature Title Date

Revised 2/22/96