

Office of the Inspector General

June 10, 2009

MANAGEMENT ADVISORY MEMORANDUM FOR:

TIMOTHY J. QUINN ACTING DIRECTOR OFFICE OF COMMUNITY ORIENTED POLICING SERVICES

Carin a. Mars RAYMOND J. BEAUDET

FROM:

ASSISTANT INSPECTOR GENERAL FOR AUDIT

SUBJECT: Improving the Office of Community Oriented Policing Services' Management of Recovery Act funds for the COPS Hiring Recovery Program (CHRP)

This memorandum is to advise you of issues we identified as part of our ongoing audit of the Office of Community Oriented Policing Services (COPS) management and implementation of funds authorized by the American Recovery and Reinvestment Act of 2009 (Recovery Act). The Recovery Act authorized \$1 billion for a grant program to hire and rehire career law enforcement officers.

COPS received approval from the Office of Management and Budget (OMB) to use the \$1 billion it received in Recovery Act funding for the COPS Hiring Recovery Program (CHRP). CHRP is a competitive grant program that provides funding directly to law enforcement agencies having primary law enforcement authority to create and preserve jobs and to increase their community policing capacity and crime-prevention efforts.

The CHRP solicitation period for Recovery Act-funded grants was open from March 16, 2009, through April 14, 2009. Subsequently, COPS officials have begun the process of reviewing applications and expect to announce selections by September 30, 2009. COPS officials have told us that the response to the CHRP solicitation has been tremendous. Over 7,000 law enforcement agencies have requested about 39,000 officer positions totaling more than \$8.3 billion, or more than eight times the available funding. To help COPS make the most efficient use of its \$1 billion in grant funds, we have identified several issues involving vetting procedures, transparency in award selection methodology, overlap with other programs, timely implementation of programs, and compliance with CHRP's retention requirement. These issues are discussed in detail below.

#### **Strengthening Vetting Procedures**

The OMB issued guidance in February 2009, with an update in April 2009, to federal agencies and recipients of Recovery Act funds on the implementation of Recovery Act programs and management of those funds.<sup>1</sup> The President also issued a memorandum on March 20, 2009, to the Heads of Executive Departments and Agencies on the subject of ensuring responsible spending of Recovery Act funds.<sup>2</sup>

Section 2 of the President's March 20 memorandum is titled "Avoiding Funding of Imprudent Projects" and discusses the issues agencies should consider before approving projects and providing recipients Recovery Act funding. A critical aspect of Section 2 states that federal agencies "shall not approve or otherwise support any project, application, or applicant for funding that is imprudent or that does not further the job creation, economic recovery, and other purposes of the Act." In addition, federal agencies are required to have "affirmatively determined, in advance, that the [...] applicant has a demonstrated or potential ability to:

- (i) deliver programmatic results;
- (ii) achieve economic stimulus by optimizing economic activity and the number of jobs created or saved in relation to the Federal dollars obligated;
- (iii) achieve long-term public benefits[...]; or
- (iv) satisfy the Recovery Act's transparency and accountability objectives."

In light of this Executive Memorandum, we believe COPS should be proactive in ensuring that COPS Recovery Act funds are used for those projects most likely to achieve these goals. Towards that end, COPS stated in its CHRP application forms that newly formed law enforcement agencies would be ineligible for Recovery Act-funded grant awards. We believe that this

<sup>&</sup>lt;sup>1</sup> Office of Management and Budget Memoranda 09-10 and 09-15.

<sup>&</sup>lt;sup>2</sup> Executive Memorandum for the Heads of Executive Departments and Agencies: Ensuring Responsible spending of Recovery Act Funds, March 20, 2009.

requirement will provide some assurance that the grant recipients will be able to deliver the programmatic results sought by the Recovery Act.

However, we believe COPS can improve its applicant vetting process in this pre-award phase in order to avoid giving CHRP grants to grantees that have a history of not complying with grant terms and conditions of other Department of Justice (DOJ) grant programs. COPS officials provided us with a general overview of the process they plan to follow in selecting and making awards to CHRP grantees, and we determined that COPs is using the same vetting procedures used in the recent past when awarding other types of COPS' grants. However, we believe COPS can strengthen its vetting process in two important aspects. First, although COPS vetting lists are routinely circulated through local U.S. Attorney Offices and four other DOJ offices (the Civil Rights Division, the Criminal Division, OJP's Office of Civil Rights, and OIG's Investigations Division), the grant-making and financial monitoring offices at OJP are not asked to review and provide any information they may have on potential COPS grantees. Because recipients of COPS grants can also receive grants from other DOJ offices, we believe COPS is foregoing potentially important information that other DOJ reviewers may have about applicants.

Second, of the DOJ offices outside of COPS that receive vetting lists, only the Civil Rights Division has a formal memorandum of understanding (MOU) with COPS detailing how issues regarding vetting will be handled. The other offices do not have MOUs and are generally asked to advise COPS if awarding a grant to any of the organizations on the vetting list would be "inappropriate or inadvisable." Although it may be unnecessary to create an MOU for each external office where vetting lists are circulated, we believe COPS would benefit from having a more detailed understanding of the methods and sources of information the other DOJ offices use when responding to vetting requests. In addition, the offices reviewing the vetting lists may benefit from a more detailed understanding of COPS' expectations regarding the office's screening of grant applicants.

By strengthening its vetting process, COPS can help reduce the risk that Recovery Act funds are awarded to applicants with known problems at other DOJ components.<sup>3</sup>

<sup>&</sup>lt;sup>3</sup> These observations on the vetting process are also contained in our technical advice report "Improving the Office of Community Oriented Policing Services' Grant Awarding, Monitoring, and Program Evaluation Processes, Fiscal Years 2005 Through 2008" to be issued in June 2009.

#### **Transparency in Award Selection Methodology**

As mentioned previously, COPS has received applications requesting funds totaling more than eight times the amount of available Recovery Act funding. Therefore, COPS will be rejecting many more applications than it will be approving. In addition, COPS officials have told us they are considering reducing the number of officers that will be funded in those grant applications that are approved. These reductions will be accomplished through methodologies still being developed.

Although CHRP grants will be awarded after assessing competitive criteria and methodologies, COPS also must award the CHRP grants according to two non-competitive requirements contained in existing law that apply to all hiring grant programs. These requirements ensure that the grant program funding is equally divided among large and small jurisdictions and that each state and territory receives at least one half of one percent (or at least \$500,000) of Recovery Act grant funds.<sup>4</sup>

OMB's guidance to federal departments for implementing the Recovery Act included significant transparency and reporting requirements to disclose how and where federal funds are spent. These requirements apply both to COPS and its CHRP grantees and required COPS to develop transparent, meritbased selection criteria for CHRP.

Although OMB's guidance did not specifically require agencies to disclose to applicants the particular reasons why their applications were either accepted or rejected, the Recovery Act did require agencies to be transparent. Therefore, we believe COPS should first consider making it more widely known that it will not be able to fund the majority of the applications that it has received. We noted that the Assistant Attorney General stated at a press event on June 2, 2009, that "Obviously, there are going to be a lot of requests that we won't be able to fund" when discussing the CHRP program.<sup>5</sup> However, we believe COPS should consider taking additional steps, such as publishing information on its website, about the large number of applicants in relation to the available funding, to ensure that applicants are not relying on the receipt of CHRP grant funds to pay for essential law enforcement operations.

<sup>&</sup>lt;sup>4</sup> 42 USC § 3796dd (f) establishes that each state or territory will receive at least 0.05 percent of all grant funds, and 42 USC § 3793 (B) establishes that grant funds will be split equally between recipients with populations above and below 150,000.

<sup>&</sup>lt;sup>5</sup> Tom Perrelli, prepared remarks at Recovery Act Press Event Detroit, Michigan, June 2, 2009.

#### Potential Overlap with JAG and Other Recovery Act Programs

Section 5 of the OMB guidance on Recovery Act fund management provides detailed information on administering grants and cooperative agreements. Section 5.1 states that agencies should "coordinate with agencies with similar grant programs to determine if there are ways to consolidate resources and efforts during the planning, award, and post-award stages of the grant cycle."

In reviewing the Department of Justice's Recovery Act grant programs, we found similar programs that law enforcement agencies could apply for, in addition to CHRP, including two of the Department's largest grant programs, the Edward Byrne Memorial Justice Assistance Grant (JAG) Formula Program and the Edward Byrne Competitive Grant Program. Both of these programs are administered by the Bureau of Justice Assistance (BJA) within the Office of Justice Programs. Additionally, there may be programs outside of the DOJ where grants could fund the hiring of law enforcement officers, particularly tribal assistance grant programs.

We discussed the potential overlap of the CHRP and the JAG programs with COPS officials and they acknowledged the possibility that COPS and BJA may potentially fund similar programs through their Recovery Act grant awards. Officials also acknowledged that having information on JAG funding or other Recovery Act funding CHRP applicants have already received, or may receive, could be useful when selecting CHRP grantees given the economic related criteria built into the CHRP selection process.

The purposes of the Recovery Act include assisting those most impacted by the recession and stabilizing state and local government budgets. Therefore, we believe COPS should consider the impact that other Recovery Act funding has, or is likely to have, on CHRP applicants, along with the other factors considered for award decisions. To effectively perform this analysis, we believe COPS should coordinate more closely with BJA to identify grantees they have in common and take into account the impact JAG grants have on these applicants. While we are not suggesting that receipt of other grants should prohibit applicants from receiving CHRP awards, COPS should consider this information when awarding grants.

#### **Ensuring Compliance with Retention Requirement**

We found that COPS' grantee selection criteria will include an assessment of potential CHRP recipients who would be most impacted by grant funds, and it appears that applicants in the most severe economic circumstances will be more likely to receive a grant. In addition to identifying applicants most affected economically, COPS is also responsible for ensuring that CHRP grantees comply with terms specific to the grant program. In particular, CHRP requires grantees to demonstrate a long-term increase in the number of sworn officer positions serving the community by retaining grant-funded officers for at least 12 months beyond the end of the CHRP grant. The retained positions must be in addition to the number of locally funded positions that would otherwise have existed without federal funding. This requirement helps to ensure a long-term increase in the number of sworn officer positions serving the community. These additional positions must be retained using state, local, or other non-federal funding.

Based on our previous audit work, we have found that economically distressed grantees often have difficulty in meeting the program's retention requirement. Because it is likely CHRP grantees will be experiencing greater economic hardships than past COPS grantees, we believe the risk that CHRP grantees will be unable to meet the retention requirement will increase significantly.

COPS has addressed this issue by providing CHRP applicants with useful information regarding the retention requirement on its Internet website, and has also incorporated similar information in the CHRP application. Although COPS has been effective at communicating these requirements, we believe COPS can do more to mitigate the potentially higher rates of non-compliance, and balance these economic and retention issues.

We encourage COPS to increase the identification of those potential grantees that are at greatest risk of noncompliance with retention requirements, such as entities that do not have a substantive retention plan, or whose retention plan relies on funding sources that cannot fully support the cost of retained officers. COPS should consider this risk in its award decisions, not to prohibit grantees from receiving funds, but as an indication of the possible need for special conditions, assistance with program implementation, or other actions to ensure compliance with the retention requirement. We also believe COPS should closely monitor the economic situation throughout the life of the grant and be prepared to periodically assist with guidance on program implementation, site visits, or other appropriate action should it become apparent that recipients will not be able to meet the retention requirement.

#### **Ensuring Timely Implementation of Programs**

Section 3.6 of the OMB guidance on Recovery Act fund management highlights the importance of agencies to obligate and expend funds timely and avoid delays in providing the economic stimulus that is central to the Recovery Act. COPS can only obligate Recovery Act funds after it selects the CHRP grantees and completes the award process. We believe the 3 months that COPS has planned for grant selection and awarding is reasonable given the competitive nature of the grant program and in light of the 7,000 applications received. Although it appears COPS will be able to obligate the Recovery Act funds in a timely manner – approximately 4 months from the close of the solicitation period – the timing of the grantees' use of the funds is less certain.

As a grant program that is focused on funding personnel expenses, the timing of CHRP expenditures is less predictable compared to grants that fund expenditures such as equipment purchases. Specifically, many factors can delay the hiring of police officers at the local or state level, including recruiting, training, and other budgetary issues. We believe that if grantees encounter these types of problems and do not spend grant funding promptly, the economic benefits of the Recovery Act will be compromised.

Based on our discussion with COPS officials, CHRP grantees are expected to begin drawing down funds anywhere from 12 to 18 months following the date the grant is awarded. As the CHRP grants will fund 3 years of police officer personnel costs, a large majority of the \$1 billion allocated to CHRP may not be drawn down and spent until calendar year 2011, with the potential to run past 2014.

COPS officials have acknowledged that in the past they have routinely provided grantees with extensions of time so that the grantees could make use of the entire award amount within a time period longer than the grant's initial deadline. We believe that ensuring grantees expend funding in a timely manner has not traditionally been a priority for COPS when compared to compliance with other aspects of the grants.

However, given the potential for significant delays in fulfilling the economic benefits of the CHRP Recovery Act grants, we suggest that COPS consider changing its policies so that it no longer routinely approves grant extensions for CHRP grantees and that it alert CHRP grantees to this change in policy.

Please advise us of the actions you intend to take regarding issues discussed in this memorandum within 30 days. If you would like to discuss the information in this memorandum, you may contact me on (202) 616-4633 or Thomas Puerzer, Regional Audit Manager, Philadelphia Regional Audit Office, on (215) 580-2111. Cynthia Bowie Assistant Director Audit Liaison Division Office of Community Oriented Policing Services

cc:

Martha Viterito Audit Liaison Office of Community Oriented Policing Services

Nancy Daniels Administrative Assistant Office of Community Oriented Policing Services



U.S. Department of Justice Office of Community Oriented Policing Services (COPS)

### **MEMORANDUM**

#### VIA ELECTRONIC and U.S. MAIL

- To: Raymond J. Beaudet Assistant Inspector General for Audit Office of the Inspector General
- From: David M. Buchanan Acting Director Office of Community Oriented Policing Services (COPS)

Date: July 9, 2009

Subject: Management Advisory Memorandum re: "Improving the Office of Community Oriented Policing Services' Management of Recovery Act Funds for the COPS Hiring Recovery Program (CHRP)"

This memorandum is in response to the Office of the Inspector General's (OIG) abovereferenced Management Advisory Memorandum (MAM) dated June 10, 2009. The COPS Office thanks the OIG for the opportunity to respond to the auditors' observations and comments. For ease of review, the issue areas identified in the memorandum are stated in bold and underlined, followed by the COPS Office's response regarding each issue.

#### **Strengthening Vetting Procedures**

The COPS Office recognizes the importance of vetting potential grant award recipients and has an established vetting policy that gathers and collectively considers relevant information on potential award recipients for the purpose of making informed funding decisions. Our vetting process provides an opportunity for various COPS divisions and certain relevant U.S. Department of Justice (DOJ) components to identify entities to which it may be inappropriate or inadvisable to award a grant.

As part of the vetting process, a vetting list is generated of applicants eligible to receive funding under a specific grant program based on a review of agency applications. As noted in the OIG's Management Advisory Memorandum<sup>1</sup>, this vetting list is distributed pre-announcement to

<sup>&</sup>lt;sup>1</sup> As noted in the Management Advisory Memorandum, these observations on the vetting process were also contained in the OIG's recent technical advice report ("Improving the Office of Community Oriented Policing Services' Grant Awarding, Monitoring, and Program Evaluation Processes"). Similarly, our response to these observations is also contained in our June 10, 2009 response to the technical advice report.

Raymond J. Beaudet

Management Advisory Memorandum re: "Improving the Office of Community Oriented Policing Services' Management of Recovery Act Funds for the COPS Hiring Recovery Program (CHRP)" July 9, 2009 Page 2

relevant points of contact within the COPS Office and within the following DOJ components: U.S. Attorney's Offices; the Civil Rights Division; OIG Investigations; the Office of Justice Programs (OJP) Office for Civil Rights; the Public Integrity Section; and the Criminal Division. In addition to a description of the program being vetted, the COPS Office provides guidance to these components in the memorandum that accompanies every vetting list instructing reviewers to provide reasons why it would be inadvisable or inappropriate to award an applicant on the list. This direction is purposefully kept broad, in order to give reviewers complete discretion to advise COPS of any reason why funding should be withheld from any agency.

In the MAM, the OIG suggests that COPS provide additional guidance to external components on what the COPS Office expects from their review of a vetting list. However, it should be noted that external components have not expressed to COPS any confusion in this regard in the past. Every vetting list includes the contact information of a COPS staff member available to answer questions and work closely with components on their responses, and who can conduct further probing of the information provided, if necessary. In addition, COPS continues to add information to our website with up-to-date and relevant materials concerning the vetting process. As a part of this endeavor, COPS will be posting Frequently Asked Questions (FAQs) pertaining to vetting on our website, which will provide further guidance on the vetting process to better inform components about this activity and the ramifications of their responses.

Moreover, prior to the distribution of the CHRP vetting list, COPS also discussed with the Executive Office of U.S. Attorneys (EOUSA) the best format for sending out the extensive list and receiving responses. As a result of this pre-vetting coordination with EOUSA, COPS created a "hidden" link on the COPS website which DOJ component vettors could access to view applicant agencies sorted by state, and which greatly helped facilitate their review.

It should also be noted that the COPS Office and OJP have begun the practice of exchanging information on high-risk grantees to decrease the chances of future grant violations. Rather than both components exchanging full vetting lists of all COPS and OJP applicants, it was mutually agreed that the sharing of these high-risk grantee lists would be more efficient and far less timeconsuming for the grant-making and financial monitoring divisions to review.

# **Transparency in Award Selection Methodology**

In the Management Advisory Memorandum, the OIG recommends that "COPS should first consider making it more widely known that it will not be able to fund the majority of applications it has received. ... [W]e believe COPS should consider taking additional steps, such as publishing information on its website, about the large number of applicants in relation to the available funding, to ensure that applicants are not relying on the receipt of CHRP grant funds to pay for essential law enforcement operations."

Raymond J. Beaudet

Management Advisory Memorandum re: "Improving the Office of Community Oriented Policing Services' Management of Recovery Act Funds for the COPS Hiring Recovery Program (CHRP)" July 9, 2009 Page 3

The COPS Office agrees with the importance of keeping agencies informed as to the overall demand for available funding in relation to the amount of funding actually available. To that end, on May 21, 2009, COPS e-mailed a letter (Attachment A) to every CHRP applicant reminding them of the amount of funding appropriated for the CHRP program, and informing them of the level of demand COPS received in terms of the total number of CHRP applications submitted, number of officers requested, and amount of funding requested. The letter clearly stated that "…these requests far exceed the funding available under CHRP, and with no cap on officer salary or local match requirement, we will only be able to fund a portion of the officer and deputy positions requested."

COPS determined that e-mailing this letter to applicant agencies would be a far more effective means of communicating the demand levels than posting the information on our website, as the e-mail method guaranteed agency receipt of the information.

## Potential Overlap with JAG and Other Recovery Act Programs

The OIG recommends that COPS "...should consider the impact that other Recovery Act funding has, or is likely to have, on CHRP applicants ... To effectively perform this analysis, we believe COPS should coordinate more closely with BJA [Bureau of Justice Assistance] to identify grantees they have in common and take into account the impact JAG [Justice Assistance Grants] grants have on these applicants."

The COPS Office agrees with the importance of considering the impact that other Recovery Act funding might have on the economic conditions of CHRP grant recipients. To that end, COPS has been coordinating closely with OJP during the development and implementation of the CHRP program, and the Acting Director of the COPS Office has briefed both the Acting Assistant Attorney General for OJP and the Acting Director of BJA regarding our program objectives, funding methodology, and rollout plans.

At this time, it is not yet known which agencies to be funded through either JAG formula or competitive grants, if any, will elect to use their BJA funding for hiring sworn law enforcement officer positions. However, the COPS Office has now provided BJA with a list of the agencies to be funded under CHRP, so that BJA will be aware of any agencies receiving funding through both programs. As the OIG has noted, the receipt of grants through one award program should not prohibit applicants from receiving other Recovery Act funds, as long as agencies are aware that grantees may not use COPS funding for the identical item or service also funded by an OJP award. Applicants were notified of this requirement in the CHRP application materials, and the same information will be included within the CHRP Grant Owner's Manual.

# **Ensuring Compliance with Retention Requirement**

Raymond J. Beaudet Management Advisory Memorandum re: "Improving the Office of Community Oriented Policing Services' Management of Recovery Act Funds for the COPS Hiring Recovery Program (CHRP)" July 9, 2009 Page 4

In the MAM, the OIG encourages COPS to "increase the identification of those potential grantees that are at greatest risk of noncompliance with retention requirements, such as entities that do not have a substantive retention plan, or whose retention plan relies on funding sources that cannot fully support the cost of retained officers."

In their CHRP applications, agencies were asked to indicate the planned source(s) of funding to be used for the retention of CHRP officer positions, if awarded. Applicants were able to select from a list of funding sources commonly used by agencies for this purpose (including general funds, tax increases, asset forfeiture funds, etc.), or to select "other" and provide a brief narrative describing their planned funding source(s). During the application review process, the information provided by any agency that selected "other" was reviewed and, for any information provided that was questionable or unclear, COPS staff contacted agencies for additional clarification. As a result of these inquiries and follow-up, the COPS Office feels that all agencies have now submitted retention planning information containing funding sources considered to be "substantive," and which would fully support the cost of retained officers.

In addition, all CHRP grantees will be reminded of the retention requirement in their award notification letters, and the grant award condition regarding retention will be listed on the CHRP award document and explained in full detail within the CHRP Grant Owner's Manual. Additional information on retention (for example, a Frequently Asked Questions document) will be available on the COPS website, and the grants management training that will be offered through the interactive CHRP "eLearn Center" will include a section on the retention of officer positions.

Furthermore, questions regarding retention will be asked of CHRP grantees annually through their programmatic progress reports, and any agency indicating potential problems in this area will be contacted by COPS staff. As necessary, such grantees may be offered program implementation guidance or technical assistance with regard to retention planning, and/or may be monitored through on-site visits or other follow-up activity.

## **Ensuring Timely Implementation of Programs**

As acknowledged by the OIG in the MAM, many factors can delay the hiring of police officers at the local or state level, including recruiting, training, and other budgetary issues. Historical hiring practices by COPS grantees reflect that it can take an average of 12 to 18 months to fill officer positions, not including the additional time needed to re-fill vacancies brought about through officer turnover, attrition, etc.

Although the COPS Office supports and encourages the timely implementation of CHRP hiring grants so as to best realize the economic benefits of the Recovery Act, our office does not wish to compromise the integrity of local hiring processes by suggesting that grantee agencies expedite or otherwise alter their usual hiring practices for the purpose of expending CHRP

Raymond J. Beaudet Management Advisory Memorandum re: "Improving the Office of Community Oriented Policing Services' Management of Recovery Act Funds for the COPS Hiring Recovery Program (CHRP)" July 9, 2009 Page 5

funding more rapidly than would otherwise be the case. However, given the importance of expending funds in a timely manner to maximize these economic benefits, the COPS Office will evaluate overall grantee progress in filling CHRP officer positions (as indicated through quarterly progress reports) and consider revising our extension policy accordingly. The policy may be changed to reduce the use of "automatic" extensions, if determined appropriate, and to require more detailed written justifications for any extension granted, with the merits of each request reviewed to ensure that the needs of the community are balanced against the purposes of the Recovery Act.

Furthermore, in the CHRP Grant Owner's Manual and other grant management documents, all CHRP awardees will be notified that, during the last quarter of the grant period, agencies will be provided the opportunity to request a no-cost time extension for their award. As with all hiring grant extensions, such an extension will give each agency additional time to expend grant funds, and complete the full 36 months of funding for each position awarded. However, grantees will also be informed that only those agencies that can provide a <u>reasonable</u> justification for project delays will be granted no-cost extensions. Reasonable justifications may include setbacks in hiring CHRP-funded positions, officer turnover, or other circumstances that interrupt the 36-month grant funding period.

In addition, CHRP grantees may contact the COPS Office at any time for technical assistance with regard to recruitment and hiring issues. A component pertaining to these topics is under development for use through the interactive CHRP eLearn Center, and grantees will be provided with useful links to related materials after award decisions are announced. For example, awardees will be reminded of information available online through the COPS Office Resource Information Center, such as the "Recruitment, Hiring, and Retention Resources for Law Enforcement" CD-ROM, and will be notified of relevant ongoing projects, including the "Police Recruitment and Retention Clearinghouse" website maintained by the RAND Corporation and the "Discover Policing" website maintained by the International Association of Chiefs of Police.

The COPS Office would like to thank the OIG for the opportunity to review and respond to the Management Advisory Memorandum. If you have any questions or would like additional information regarding any of the topics discussed in this memorandum, please contact Bob Phillips, Deputy Director for Operations, at (202) 616-2876, or Cynthia Bowie, Assistant Director for the Audit Liaison Division, at (202) 616-3645.

cc: Richard P. Thies Director, DOJ/JMD Audit Liaison Office

> Thomas O. Puerzer Regional Audit Manager, OIG Philadelphia Regional Audit Office



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U.S. Department of Justice Office of Community Oriented Policing Services (COPS)

Office of the Director 1100 Vermont Avenue, N.W. Washington, DC 20530

Dear Colleague:

Thank you for submitting your COPS Hiring Recovery Program (CHRP) application. It is now under active review at the COPS Office. While that work continues, we want to update you on our progress and the process we are using to make funding decisions under this very competitive grant program.

As you know, the COPS Office was appropriated \$1 billion through the Recovery Act to make grants to create or save state, local, and tribal law enforcement jobs. During the CHRP solicitation period, we received 7,272 applications. These applications total \$8.3 billion and request more than 39,000 sworn law enforcement positions. Obviously, these requests far exceed the funding available under CHRP, and with no cap on officer salary or local match requirement, we will only be able to fund a portion of the officer and deputy positions requested.

Since the April 14, 2009 application deadline, the COPS Office has been actively reviewing the data submitted in each application. In some cases, we have reached out to applicant agencies to verify information provided in their applications. In fact, we contacted more than 1,700 agencies to validate their data, and in total the COPS Office reviewed over 275,000 individual data points. If your agency was not contacted by COPS during this phase of our work, that simply means that upon initial review by our staff, no further probing was required for your application. This data verification process, though time consuming, is very important because it ensures that all applicants will be properly evaluated based on each agency's economic, crime, and community policing data.

Now that the work described above is complete, we are moving quickly to the next phase of our process, which includes in-depth budget request reviews and evaluating the retention requirement information and other aspects of the application. In preparing a final CHRP award list, we will look at the total number of sworn positions being requested by each agency and determine how best to allocate the funds available.

The COPS Office will complete all this work and make awards no later than September 30, and likely sooner.

For more information, please visit the COPS website (<u>www.cops.usdoj.gov</u>), where we will post any new information about CHRP, updates on other our FY09 grant programs, and a wealth of information on community policing.

Sincerely,

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Timothy J. Quinn Acting Director