
GRANT APPLICATION SUMMARY SHEET

Grant Name: 2024 PSN Middle Grant 24
Department: POLICE DEPARTMENT
Grantor: U.S. DEPARTMENT OF JUSTICE
Pass-Through Grantor (If applicable): TENN DEPT OF JUSTICE PROGRAMS
Total Applied For: \$159,172.00
Metro Cash Match: \$0.00
Department Contact: Jim Stephens
 880-2850
Status: CONTINUATION

Program Description:

Funding will be used for reducing violent crime in Davidson County. This funding will be only used to pay for overtime for violent crimes involving guns.

Plan for continuation of services upon grant expiration:

Project is totally grant funded and will cease upon expiration of the grant.

APPROVED AS TO AVAILABILITY OF FUNDS:

APPROVED AS TO FORM AND LEGALITY:

<p><u><i>Kevin Crumbo/mfw</i></u> 2/27/2024 5:18 PM CST Director of Finance <i>EF AP</i> Date</p>	<p><u><i>Courtney Mohan</i></u> 2/28/2024 9:56 AM CST Metropolitan Attorney Date</p>
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APPROVED AS TO RISK AND INSURANCE:

<p><u><i>Balogun Cobb</i></u> 2/27/2024 7:26 PM CST Director of Risk Management Services Date</p>	<p><u><i>Freddie O'Connell</i></u> 2/29/2024 9:59 AM CST Metropolitan Mayor Date (This application is contingent upon approval of the application by the Metropolitan Council.)</p>
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Grants Tracking Form

Part One

Pre-Application <input type="radio"/>		Application <input checked="" type="radio"/>		Award Acceptance <input type="radio"/>		Contract Amendment <input type="radio"/>	
Department	Dept. No.	Contact		Phone	Fax		
POLICE DEPARTMENT	031	Jim Stephens		880-2850	880-3077		
Grant Name:	2024 PSN Middle Grant 24						
Grantor:	U.S. DEPARTMENT OF JUSTICE			Other:			
Grant Period From:	07/01/24	<small>(applications only)</small> Anticipated Application Date:		03/01/24			
Grant Period To:	06/30/25	<small>(applications only)</small> Application Deadline:		03/01/24			
Funding Type:	FED PASS THRU	Multi-Department Grant		<input type="checkbox"/> If yes, list below.			
Pass-Thru:	TENN DEPT OF JUSTICE PROGRAMS	Outside Consultant Project:		<input type="checkbox"/>			
Award Type:	COMPETITIVE	Total Award:		\$159,172.00			
Status:	CONTINUATION	Metro Cash Match:		\$0.00			
Metro Category:	Est. Prior.	Metro In-Kind Match:		\$0.00			
CFDA #	16.609	Is Council approval required?		<input type="checkbox"/>			
Project Description:	Funding will be used for reducing violent crime in Davidson County. This funding will be only used to pay for overtime for violent crimes involving guns.						
Plan for continuation of service after expiration of grant/Budgetary Impact:							
Project is totally grant funded and will cease upon expiration of the grant.							
How is Match Determined?							
Fixed Amount of \$		or		% of Grant			
				Other: <input checked="" type="checkbox"/>			
Explanation for "Other" means of determining match:							
Grant funds will not cover complete cost and require additional funds to make purchase.							
For this Metro FY, how much of the required local Metro cash match:							
Is already in department budget?		\$0.00		Fund	Business Unit		
Is not budgeted?		\$0.00		Proposed Source of Match:			
(Indicate Match Amount & Source for Remaining Grant Years in Budget Below)							
Other:							
Number of FTEs the grant will fund:		0.00		Actual number of positions added:			
Departmental Indirect Cost Rate		31.20%		Indirect Cost of Grant to Metro:			
				\$49,661.66			
*Indirect Costs allowed? <input type="radio"/> Yes <input checked="" type="radio"/> No		% Allow.		Ind. Cost Requested from Grantor:			
		0.0%		\$0.00 in budget			
<small>*(If "No", please attach documentation from the grantor that indirect costs are not allowable. See Instructions)</small>							
Draw down allowable? <input type="checkbox"/>							
Metro or Community-based Partners:							

Part Two

Grant Budget

Budget Year	Metro Fiscal Year	Federal Grantor	State Grantor	Other Grantor	Local Match Cash	Match Source (Fund, BU)	Local Match In-Kind	Total Grant Each Year	Indirect Cost to Metro	Ind. Cost Neg. from Grantor
Yr 1	FY25	\$159,172.00	\$0.00	\$0.00	\$0.00		\$0.00	\$159,172.00	\$49,661.66	\$0.00
Yr 2	FY__									
Yr 3	FY__									
Yr 4	FY__									
Yr 5	FY__									
Total		\$159,172.00	\$0.00	\$0.00	\$0.00		\$0.00	\$159,172.00	\$49,661.66	\$0.00
Date Awarded:			Tot. Awarded:			Contract#:		FFY22 PSN MIDDLE		
(or) Date Denied:			Reason:							
(or) Date Withdrawn:			Reason:							

Contact:

juanita.paulsen@nashville.gov
vaughn.wilson@nashville.gov



TENNESSEE Grant Solicitation Packet



Middle Tennessee Project Safe Neighborhoods Assistance Listing Number 16.609

Released on: 2/1/2024
Intent to Apply due: 3/1/2024
Completed applications due: 3/1/2024

Prepared by:

State of Tennessee
Office of Criminal Justice Programs
Department of Finance and Administration
312 Rosa L. Parks Avenue
William R. Snodgrass Tennessee Tower, Suite 1800
Nashville, Tennessee 37243-1102

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1. **IMPORTANT INFORMATION**

Project Safe Neighborhoods (PSN) is designed to create and foster safer neighborhoods through a sustained reduction in violent crime, including, but not limited to, addressing criminal gangs and the felonious possession and use of firearms. The program's effectiveness depends upon the ongoing coordination, cooperation, and partnerships of local, state, tribal, and federal law enforcement agencies-and the communities they serve-engaged in a unified approach led by the U.S. Attorney Office (USAO) in all 94 districts. Acting decisively in a coordinated manner at all levels-federal, state, local, and tribal-will help reverse a rise in violent crime and keep American citizens safe. PSN provides the critical funding, resources, and training for law enforcement, prosecutors, and their PSN teams to combat violent crime and make their communities safer through a comprehensive approach to public safety that marries targeted law enforcement efforts with community engagement, prevention, and reentry efforts.

With PSN, each USAO is responsible for establishing a collaborative PSN team of federal, state, local, and tribal (where applicable) law enforcement and other community members to implement a strategic plan for investigating, prosecuting, and preventing violent crime. Through the PSN team (referred to as the "PSN task force"), each district will implement the five design features of PSN-leadership, partnership, targeted and prioritized enforcement, prevention, and accountability-to address violent crime in their respective districts.

All of OCJP subrecipients will be required to have on file signed and initialed copies of Certification, Assurances, and Special Conditions required from both the Federal Level and State Level.

1.1. **Available Funds**

Project Safe Neighborhoods (PSN), Assistance Listing Number 16.609

1.2. **Eligibility**

Eligible subrecipients are limited to the Metropolitan Government of Nashville and Davidson County as specified in the approved FY2022 Project Safe Neighborhood narrative. Implementation will be limited to the Metro-Nashville police department and its partners.

Applicants must designate 30% of their funding for gang task force work to include strategies to reduce violent crime, firearms offenses, human trafficking, and drug trafficking.

1.3. **Length and Amount of Project Support**

Project budgets under this section are not to exceed **\$159,172.00** in total federal grant funds. **\$49,552.00** in funding is set aside for gang task force related projects. **\$109,620.00** is the balance available for all other PSN projects.

Multi-year contracts will remain contingent, as always, on the availability of federal appropriations. Federal approval of the project and budget is required before the start of the contract. This project has the potential for amendment with additional PSN funds.

Year 1: July 1, 2024 – June 30, 2025

1.4. **Program Purpose**

The purpose of this solicitation is to seek projects which meet the listed goals: **1) Reducing gun crime in the jurisdiction and 2) implementing gang activity reduction strategies and supporting gang taskforce work.**

The Middle Tennessee FY22 Project Safe Neighborhoods Initiative focuses on improving collaboration between federal and local partners a by tracking shooters with National Integrated Ballistics Information Network (NIBIN) data, drawing connections through other investigative techniques, and holding shooters accountable to disrupt shooting cycles. This funding will also

support gang task forces in regions of Tennessee experiencing a significant or increased presence of criminal or transnational organizations engaging in high levels of violent crime, firearms offenses, human trafficking, and drug trafficking. Approved projects will be provided funding for overtime to successfully complete these activities.

1.5. **Grant Solicitation Communications**

The State has assigned the following Grant Solicitation identification title that must be referenced in all communications regarding this Grant Solicitation:

FFY22 PSN Middle

- 1.5.1. Prospective Applicants must direct communications concerning this Grant Solicitation to the following email designated and indicate which Grant Solicitation Title in the subject line:

Meribeth.Howell@tn.gov

1.6. **Notice of Intent to Apply**

Applicants should complete the [Intent to Apply](#) by the deadline detailed in the Grant Solicitation Section 3, Schedule of Events.

Completion of the Intent to Apply form creates no obligation, but is a prerequisite for submitting an application and necessary to ensure receipt of any Grant Solicitation updates or other notices and communications relating to this Grant Solicitation. The Intent to Apply and all documents must reference the Grant Solicitation Title found in section 1.5

1.7. **Application Deadline**

An Applicant must ensure that the State receives an application no later than the application deadline time and date detailed in the Grant Solicitation Section 3, Schedule of Events. An Applicant must apply, as required, to this Grant Solicitation (including all attachments). The State will not accept late applications, and an Applicant's failure to submit its application by the deadline will result in disqualification of the application.

2. IMPORTANT INFORMATION

2.1. Scope of Services/Project Narrative

The Office of Criminal Justice Programs has provided a word document for use in constructing an application under this solicitation based on the various projects types available. First select the proper scope of services/project narrative from the list below and save this document to your computer with the grant solicitation identification title before completing it. (**consult the name listed in 1.5**)

The [Scope of Services/Project Narrative](#) contains the following headers and will be evaluated based upon the following criteria:

EVALUATION CATEGORY
Problems and needs
Eligibility
Purpose
Activities
Implementation Timeline
Inputs
Data collection procedure
Collaboration Activities
Intended outputs
Intended outcomes

The Scope of Services/Project Narrative should be submitted with the application. See Sections 2.3 and 2.4 for information on how to submit your application.

2.2. Budget Summary and Line-Item Detail

Begin by saving this document to your computer with the **grant solicitation title** and then fill in the budget detail and the summary of this spreadsheet. Please use whole numbers.

PSN: [Budget](#), [Budget Instructions](#)

You must complete one budget for the full project.

NOTE: Thoroughly read the instructions before preparing the budget. The Project Title at the top of the budget summary page must match the title submitted in Intent to Apply and on your Scope of Services/Project Narrative (see 1.5).

Each fiscal year project budget consists of two components: the Summary Budget Amounts for the Federal, and Line-Item total for each line item; and the Budget Narrative for each line item where narrative detail is required. All budgeted line items must be reasonable, necessary, and allocable directly to the project.

See Section 2.3 and 2.4 for information on how to submit your application.

2.3. Application Submission

An Applicant must ensure that the State receives a response no later than the Response Deadline

time and date detailed in the Grant Solicitation Section 3, Schedule of Events at the following email address:

Meribeth.Howell@tn.gov

2.4. Application Requirements

- 2.4.1. The first step to the application process is to submit the Intent to Apply form through the following on-line link: [Intent to Apply](#) by 3/1/2024 as your intent to apply for this grant (See Grant Solicitation Section 3, Schedule of Events). **Intent to Apply must reference the grant solicitation identification title (See section 1.5).**
- 2.4.2. The next step is to create a [Scope of Services/Project Narrative](#) by using the word forms document found at the links provided in 2.1 that corresponds with the solicitation grant solicitation identification title.
- 2.4.3. Next create a budget:
PSN projects: [Budget](#), [Budget Instructions](#)
- 2.4.4. Other Funds Form – application attachment provided at the following link: [Other Funds Form](#).
- 2.4.5. Create and attach a copy of the organizational chart used if awarded this grant.
- 2.4.6. Complete the [Certification - PSN - Research Independence and Integrity](#) if project involves research
- 2.4.7. Submit approved cost allocation plan (if applicable)
- 2.4.8. Submit approved indirect cost rate (if applicable)
- 2.4.9. Submit [De Minimis certification](#) if electing to use the 10% De Minimis rate.
- 2.4.10. Use the attached checklist at the end of this application and submit all required documents (except Intent to Apply which is an online document), via e-mail to Meribeth.Howell@tn.gov.

All above documents should be emailed to Meribeth.Howell@tn.gov with the grant solicitation identification title in the subject line of the email (complete list located in section 1.5).

2.5. Application Deadline

3/1/2024

2.6. Response Preparation Costs

The State will not pay any costs associated with the preparation, submittal, or presentation of any application.

2.7. Application Completion Check-off List

(Retain for your own purposes)

To ensure compliance with funding consideration requirements, please read the entire solicitation.

- [Intent to Apply](#) completed and submitted online no later than 3/1/2024.
- [Scope of Services/Project Narrative](#) completed on the forms document
- Budget completed on the excel spreadsheet (one budget for full project):
PSN projects: [Budget](#) and [Budget Instructions](#)
- [Other Funds Form](#)
- [Certification - PSN - Research Independence and Integrity](#). (If applicable)
- Agency Organizational Chart
- Most recent approved Cost Allocation Plan (if applicable)
- Approved Indirect Cost Rate (if applicable)
- [De Minimis Certification](#) (if applicable)

Applications must be submitted in accordance with Section 2.4 no later than 4:30 pm central time, 3/1/2024.

If you have completed the above items and emailed to Meribeth.Howell@tn.gov with the grant solicitation description title in the subject line (see section 1.5 for a complete list), then your application is complete.

3. GRANT SOLICITATION SCHEDULE OF EVENTS

3.1. The following Grant Solicitation Schedule of Events represents the State's best estimate for this Grant Solicitation.

EVENT	TIME (central time zone)	DATE
1. Grant Solicitation Issued		2/1/2024
2. Notice of Intent to Apply Deadline	4:30 p.m.	3/1/2024
3. Application Deadline	4:30 p.m.	3/1/2024
4. Contract Start Date		7/1/2024

3.2. **The State reserves the right, at its sole discretion, to adjust the Grant Solicitation Schedule of Events as it deems necessary.** Any adjustment of the Schedule of Events shall constitute a Grant Solicitation update, and the State will communicate such to prospective Applicants from whom the State has received a Notice of Intent to Apply (refer to section 1.5).

4. FUND SOURCE DESCRIPTIONS AND SPECIFIC REQUIREMENTS

4.1. PSN Funds

The intent of the PSN is to provide criminal justice assistance to state agencies, local units of government, and non-profit organizations. The Department of Justice has defined a unit of local government as a general-purpose political subdivision of a state, such as a judicial district, city, or county. PSN funds may be used by the subrecipient for personnel costs, training and technical assistance, equipment, operational costs, and information systems that are part of an approved project and are in addition to the resources already available to the subrecipient. Costs must be reasonable, allocable, and necessary to the project and comply with the PSN Program requirements. Any questions about allowable use of funds should be directed to the Office of Criminal Justice Programs.

4.1.1. Allowable Use of Funds

- a. General Salaries and Personnel Costs: Payment of personnel costs are allowable if costs are a part of an approved project and are necessary and incidental to project implementation and operation. Overtime pay will only be approved by OCJP on a case by case basis.
- b. Operational Costs: Payment of operational costs is allowable if costs are part of an approved project and are necessary to the project implementation and operation. Operational costs may include supplies, telecommunication costs, postage and shipping, printing and publications costs, rent, equipment rental costs and insurance costs. Costs for a program must be prorated across all fund sources.
- c. Clothing and Furniture Costs: Payment of clothing and furniture must be pre-approved by OCJP before a purchase is made.
- d. Professional Fees: If the implementing governmental agency or non-profit organization is entering into a subcontractual relationship with an entity that is providing project based professional services for the project, a subcontract will be required between the implementing agency and the subcontracting entity. Subrecipients should check the Administrative Manual as many items in this line item require a pre-approved Subcontract. Enter the name of the individual or company being used, the number of hours or days for the fiscal year and the total cost. Consultant rates of payment are to be reasonable and consistent with fees for similar services in the market place. Individual consultant fees cannot exceed \$650 per day or \$81.25 per hour; this includes legal, medical, psychological, training, and accounting consultants.
- e. Publication of Documents and Electronic Media: Project directors are encouraged to make the results and accomplishments of their activities available to the public. A subrecipient who publicizes project activities and results shall adhere to the following:

Responsibility for the direction of the project should not be ascribed to the Department of Justice or the Tennessee Office of Criminal Justice Programs.

All reports, studies, notices, informational pamphlets, press releases, signs, billboards, DVDs, public awareness kits, training curricula, webinars, websites, and similar public notices (written, visual or sound) prepared and released by the Grantee shall include the statement:

“This project was supported by Award No. (insert award number) awarded by the Bureau of Justice Assistance, Department of Justice.”

Additionally, studies and research/report type publications expressing the direction of project activity must also contain the following federal funding statement:

The opinions, findings, conclusions or recommendations contained within this document are those of the author and do not necessarily reflect the views of the Department of Justice or the State of Tennessee, Office of Criminal Justice Programs.”

- f. Equipment: Equipment expenses, which are part of an approved project, if necessary and allocable to that project, are allowable expenses. Equipment defined as tangible non-expendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit or "Sensitive Minor Equipment". "Sensitive Minor Equipment" defined as moveable, high-risk, sensitive property items purchased with a cost between \$500.00 and \$5,000.00, such as computers (i.e., laptops, tablets), weapons, TVs, and cameras acquired, used and managed for criminal justice grant purposes. Equipment or other assets that are purchased in whole or in part with grant funds are subject to OCJP policy guidelines. These guidelines require that whenever a subrecipient wishes to dispose of surplus equipment, or change its use, the equipment must be returned to the Office of Criminal Justice Programs. There is no time limit on this requirement.
- g. Technology: In order to promote information sharing and enable interoperability among disparate systems across the justice and public safety community, OCJP requires the grantee to comply with DOJ's Global Justice Information Sharing Initiative (DOJ's Global) guidelines and recommendations for this particular grant. Subgrantee shall conform to the Global Standards Package (GSP) and all constituent elements, where applicable, as described at: http://www.it.ojp.gov/gsp_grantcondition. Subgrantee shall document planned approaches to information sharing and describe compliance to the GSP and appropriate privacy policy that protects shared information, or provide detailed justification for why an alternative approach is recommended.
- h. Software and Hardware: Any law enforcement records management system must be from a TBI approved vendor and be TIBRS compliant. Records management systems must be preapproved by OCJP prior to submitting the proposal. Records management systems must be XML compatible.
- i. Travel: Expenses and reimbursements for in state and out of state travel must follow the most current comprehensive State of Tennessee Travel Rules and Regulations.
- j. Training, Conferences, and Meetings: Training, Conferences, and Meetings: which are part of an approved project, if necessary and allocable to that project, are allowable expenses. The following cost thresholds are in place:
 - Meeting Room/Audio Visual Services: Lesser of \$25 per day per attendee or \$20,000.
 - Logistical Planners: Lesser of \$50 per attendee or \$8,750.
 - Programmatic Planners: Lesser of \$200 per attendee or \$35,000.
 - Food and Beverage: Generally not allowed.
 - Refreshments: Generally not allowed.

4.1.2. **PSN Program Federal and State Requirements**

- a. Record of Effective Services: Organizations must demonstrate a record of providing effective services to crime victims. This includes having the support and approval of its services by the community, a history of providing direct services in a cost-effective manner, and financial support from other sources.
- b. Comply with Federal Rules Regulating Grants: Sub-recipients must comply with the applicable provisions of PSN, the program guidelines (found at [28 C.F.R. Part 94](#)), and the requirements of the DOJ Grants Financial Guide, which includes maintaining appropriate programmatic and financial records that fully disclose the amount and disposition of PSN funds received. This includes: Financial documentation for disbursements, daily time and attendance records specifying time devoted to allowable PSN services, the portion of the project supplied by other sources of revenue, job descriptions, contracts for services, and other records which facilitate an effective audit.
- c. Maintain Civil Rights Information: Maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age, and disability, within the timetable established by the state grantee, and permit reasonable access to its books, documents, papers, and records to determine whether the sub-recipient is complying with applicable

civil rights laws.

- d. Text Messaging While Driving: Pursuant to Executive Order 13513 of October 1, 2009, "Federal Leadership on Reducing Text Messaging While Driving," all Department of Justice (DOJ) recipients and sub-recipients are encouraged to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this grant, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers. Texting while driving a vehicle in Tennessee is illegal per Texting While Driving Law (TCA 55-8-199).
- e. Computer Network Requirements: The sub-recipient understands and agrees that (a) No award funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography, and (b) Nothing in subsection (a) limits the use of funds necessary for any Federal, State, tribal, or local law enforcement agency or any other entity carrying out criminal investigations, prosecution, or adjudication activities.
- f. Non-Disclosure Prohibited: No recipient or sub-recipient under this award, or entity that receives a contract or subcontract with any funders under this award, may require an employee or contractor to sign an internal confidentiality agreement or statement that prohibits, or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.
1. Prohibition on Reprisal: The recipient must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant. The recipient also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712. Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DOJ awarding agency (OJP or OVW, as appropriate) for guidance.
- g. Compliance with Network Technology Regulations: In order to promote information sharing and enable interoperability among disparate systems across the justice and public safety community, OCJP requires the subgrantee to comply with DOJ's Global Justice Information Sharing Initiative (DOJ's Global) guidelines and recommendations for this particular grant. Subgrantee shall conform to the Global Standards Package (GSP) and all constituent elements, where applicable, as described at: http://www.it.ojp.gov/gsp_grantcondition. Subgrantee shall document planned approaches to information sharing and describe compliance to the GSP and appropriate privacy policy that protects shared information, or provide detailed justification for why an alternative approach is recommended.
- To avoid duplicating existing networks or IT systems in any initiatives funded by BJA for law enforcement information sharing systems which involve interstate connectivity between jurisdictions, such systems shall employ, to the extent possible, existing networks as the communication backbone to achieve interstate connectivity, unless the subgrantee can demonstrate to the satisfaction of BJA that this requirement would not be cost effective or would impair the functionality of an existing or proposed IT system.
- h. Prohibited Conduct Related to Trafficking in Persons: The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part of recipients, subrecipients ("subgrantees"), or individuals defined (for purposes of this condition) as "employees" of the recipient or of any subrecipient.

Details of the recipient's obligations related to prohibited conduct related to trafficking in persons are posted on the OJP web site at <https://ojp.gov/funding/Explore/ProhibitedConduct>.

[Trafficking.htm](#) (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OJP authority to terminate award)), and are incorporated by reference here.

- i. Research and Evaluation Independence and Integrity (if applicable): If an application involves research (including research and development) and/or evaluation, the applicant must demonstrate research/evaluation independence and integrity, including appropriate safeguards, before it may receive award funds. The applicant must demonstrate independence and integrity regarding both this proposed research and/or evaluation, and any current or prior related projects.

Application must include [Certification - PSN - Research Independence and Integrity](#).

4.1.3. **Unallowable PSN costs**

Please reference [Chapter XV. Unallowable Costs](#) of the OCJP Grants Manual for full explanations and restrictions regarding generic Unallowable Costs.

Food and Beverages: Food, snacks, and beverages are not allowed under PSN funding.

Construction: Use of grant funds for construction projects is prohibited under both state and federal guidelines for this program.

Land Acquisition: Acquisition of land with PSN grant funds are prohibited.

Supplanting: Federal funds must be used to supplement existing State and local funds for program activities and must not supplant those funds that have been appropriated for the same purpose. Supplanting will be reviewed during the application process, post-award monitoring, and audit.

Generic Unallowable Costs:

- Construction,
- Land acquisition (Purchase of real property),
- Any expenditures that reflect supplanting,
- Compensation of federal employees,
- Travel of federal employees,
- Bonuses or commissions,
- Military type equipment,
- Lobbying,
- Fundraising (including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions),
- Corporate formation,
- State and Local taxes,
- Trainings and workshops have unallowable cost restrictions,
- Food is unallowable, except food provided directly for victim's needs,
- Legal fees,
- Cost in applying for this grant,
- Any expenses prior to the grant award date,
- First class travel,
- Management or administrative training,
- Gas or gift cards,
- Sole source contracts (without the prior written approval from the OCJP), and
- Cost incurred outside the project period.
- Administrative liability insurance.

Lobbying: In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") at any tier, either directly or indirectly, to support or oppose the enactment, repeal, modification, or adoption of any law, regulation, or policy, at any level of government. See 18 U.S.C. 1913.

Another federal law generally prohibits federal funds awarded by OJP from being used by the recipient, or any subrecipient at any tier, to pay any person to influence (or attempt to influence) a federal agency, a Member of Congress, or Congress (or an official or employee of any of them) with respect to the awarding of a federal grant or cooperative agreement, subgrant, contract, subcontract, or loan, or with respect to actions such as renewing, extending, or modifying any such award. See 31 U.S.C. 1352. Certain exceptions to this law apply, including an exception that applies to Indian tribes and tribal organizations.

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

Please Note: This list is NOT ALL-INCLUSIVE. For further clarification, contact OCJP or refer to the PSN portion of the OCJP Grants Manual at the following link: [OCJP Grants Manual](#).

5. PROGRAM REQUIREMENTS

5.1. Other Federal and State Program Requirements

Each sub-recipient organization shall meet the following **requirements that apply to all applicants unless otherwise specified**:

- 5.1.1. Confidentiality: Each agency that receives a grant from the Office of Criminal Justice Programs (OCJP) to provide direct services to victims of crime should have a confidentiality policy in place to protect confidential personally identifying information. Furthermore, confidentiality statements should be signed by all staff, volunteers, interns, board members, etc. and should state, at a minimum, that s/he will protect the personally identifying information of all persons contacting the agency for service, regardless of whether these persons actually receive services from the agency. For further confidentiality requirements, please see the OCJP Grants Manual, [Chapter XX, Retention of and Access to Records](#), Confidentiality Policy, and [28 C.F.R. 94.115](#).
- 5.1.2. Items Requiring Pre-Approval: The following budget items must be pre-approved: capital purchases, depreciation, Sensitive Minor Equipment, furniture, clothing and other categories specifically noted in the description.
- 5.1.3. Law Enforcement Agencies: In order for law enforcement agencies to qualify for grant funds, they must comply with the following:
- a. Fingerprint Reporting Requirement: The Agency shall ensure that they will comply with Tennessee Code Annotated (TCA) 38-3-122 and will submit all fingerprints taken to the Tennessee Bureau of Investigation (TBI).
 - b. TIBRS Reporting Requirement: The Agency shall ensure that they comply with the rules and regulations of the Tennessee Bureau of Investigations (TBI) as empowered by Tennessee Code Annotated (TCA) 38-10-101 et seq. with regard to the Tennessee Incident Based Reporting System (TIBRS). The agency will at all times maintain TBI certification of their compliance with those rules and regulations.
 - c. National Instant Criminal Background Check System (NICS) Reporting Requirement: The Agency shall ensure that they comply with Tennessee Code Annotated (TCA) 33-3-1115 with regard to NICS Reporting. The agency will at all times maintain compliance.
 - d. Death in Custody Reporting Act (DICRA) Requirement: The Agency shall comply with PUBLIC LAW 113-242 by submitting all deaths in custody to the TBI.
 - e. DNA and CODIS Requirements: The Agency shall ensure that they will comply with Tennessee Code Annotated (TCA) 40-35-321 regarding the collection of DNA.
 - f. Use of Force Requirement: The Agency must have a certification from the Tennessee Association of Chiefs of Police regarding their Use of Force policies. The Agency must also comply with TCAs 38-3-121, 38-8-101, 38-8-113, 38-8-127:130, and 40-6-105.

Please note that 5.1.3. a-f are also federal requirements.

- 5.1.4. Evidence-Based Programming: Agencies should employ evidence-based programming in their grant project or use best practices (as identified in research) in the implementation of their proposed project. Framework for evidence-based programming has a logic model, or a theory of action, that guides its operation. Outputs are process measures, while outcomes communicate impact on participants or systems over time. The evidence and strong evidence steps indicate that the program is supported by at least one rigorous evaluation. Various factors can prevent a program from being rigorously evaluated, so ultimately the expectation is that all Tennessee programs are at least measuring outcomes. Websites such as www.CrimeSolutions.gov or

<http://www.samhsa.gov/programs-campaigns> offer resources that applicants may use to find information about evidence-based programs in criminal justice, juvenile justice, and crime victim services.

- 5.1.5. **Mandatory Reporting of Child Abuse and Adult Abuse:** Agencies must comply with Tennessee Code Annotated, Sections 37-1-403 and 37-1-605 by reporting suspected cases of child abuse to the Department of Children's Services and with Tennessee Code Annotated 71-6-103 by reporting cases of adult abuse to the Department of Human Services as required by law.
- 5.1.6. **Federal Funding Accountability and Transparency Act of 2006 (FFATA):** Per Public Law 109-282, all applicants are required to register via SAM, and provide employee compensation information (if applicable) to be eligible for this funding.
- a. **SAM Generated Unique Entity Identifier (UEI):** The Grantee will obtain a Unique Entity Identifier (SAM) and maintain its number for the term of this Grant Contract. More information about obtaining a Unique Entity Identifier can be found at <https://www.gsa.gov>.
- b. **Executive Compensation Reporting:** FFATA requires a sub-grantee of a federal award to report the names and total compensation of the most highly compensated executives (i.e., officers, managing partners, or any other employees in management positions) if they meet the following criteria:
- (1) 80 percent or more of the sub-grantee's annual gross revenues from Federal procurement contracts and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320; and
- (2) \$25,000,000 or more in annual gross revenues from Federal procurement contracts, and Federal financial assistance subject to the Transparency Act; and,
- (3) The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission total compensation filings at [Executive Compensation | Investor.gov](#))
- 5.1.7. **Additional State or Federal Funds Received:** The sub-recipient agrees that if it currently has a contract with OCJP and receives additional state or federal funding, outside OCJP, and those funds are to be used, in whole or in part, for one or more of the identical cost items for which funds are being provided under the OCJP contract, the sub-recipient will promptly notify the OCJP program manager in writing.
- 5.1.8. **Program Income:** Program income, as defined by 2 CFR 200.80, means gross income earned by a non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance. **Program Income is unallowable without prior approval.**
- 5.1.9. **Subject to Funds Availability:** Funding is subject to the appropriation and availability of Federal funds. In the event that the funds are not appropriated or are otherwise unavailable, the State reserves the right to terminate this solicitation. Upon such termination, the Grantee shall have no right to recover from the State any actual, general, special, incidental, consequential, or any other damages whatsoever of any description or amount.
- 5.1.10. **Tennessee Department of Revenue Registration:** Pursuant to Tennessee Code Annotated (TCA) 12-3-306 all sub-recipients must comply with the Retailers' Sales Tax Act compiled in TCA 67-6-8 101 et seq. All sub-recipients and therefore required to either register a sales and use account with the Department of Revenue or seek an exemption from the same. Information on the process can be found at: [Sales and Use Registration](#).

To determine eligibility click on the **link above** and navigate in the following manner:
TNTAP < Help < TN Vendor Contract Questions.

Follow the instructions on this page to determine whether or not your agency requires as sales and use account or has a valid exemption.

If your agency is exempt please provide the exemption letter provided by the website with your application.

Applications must include sales/use registration information or exemption letter. Requests for this registration or exemption should be initiated at least two (2) business days prior to application due date. (This does not apply to Drug Task Forces (DTF) and State and Local Law Enforcement.)

- 5.1.11. High Risk Designation: Requirement to disclose whether recipient is designated "high risk" by a federal grant-making agency. If the recipient is designated "high risk" by a federal grant-making agency, currently or at any time during the course of the period of performance under this award, the recipient must disclose that fact and certain related information to the OCJP.

For purposes of this disclosure, high risk includes any status under which a federal awarding agency provides additional oversight due to the recipient's past performance, or other programmatic or financial concerns with the recipient. The recipient's disclosure must include the following: 1. The federal awarding agency that currently designates the recipient high risk, 2. The date the recipient was designated high risk, 3. The high-risk point of contact at that federal awarding agency (name, phone number, and email address), and 4. The reasons for the high-risk status, as set out by the federal awarding agency.

Applicants will be required to submit a [High Risk Designation Certification](#) if selected for funding.

- 5.1.12. State Sponsored Insurance Plan Enrollment: The subrecipient warrants that it will not enroll or permit its employees, officials, or employees of contractors to enroll or participate in a state sponsored health insurance plan through their employment, official, or contractual relationship with unless the subrecipient first demonstrates to the satisfaction of the Department of Finance and Administration that it and any contract entity satisfies the definition of a governmental or quasigovernmental entity as defined by federal law applicable to ERISA.
- 5.1.13. Prohibited and Controlled Equipment and Associated Procedures: The JAG statute, at 34 U.S.C. § 10152(d), specifically identifies a list of prohibited items. In addition, consistent with Executive Order 14074, Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety of May 25, 2022, the use of grant funds for the purchase or transfer of certain equipment has been designated as prohibited or controlled starting with FY 2023 OJP grant funds. Details and associated procedures for requesting prior approval, where applicable, can be found in the [Prohibited and Controlled Equipment Guidance](#).
- 5.1.14. Limited English Proficiency Compliance with Title VI of the Civil Rights Act of 1964, which prohibits grantees from discriminating on the basis of national origin in the delivery of services or benefits, entails taking reasonable steps to ensure that persons with limited English proficiency (LEP) have meaningful access to their programs and activities. An LEP person is one whose first language is not English and who has a limited ability to read, write, speak, or understand English. To assist grantees in meeting their obligation to serve LEP persons, DOJ has published a number of resources, including a language access assessment and planning tool. Additional resources are available on the Office of Civil Rights webpage. Grantees should contemplate how their program budget supports the costs for providing interpretation and translation services to eligible LEP persons or be able explain how language access will be provided if grant funds are not needed for this purpose.

5.2. Additional Program Requirements

For further program requirements please refer to the OCJP Grants Manual on the Office of Criminal Justice Programs website at the following link: [OCJP Grants Manual](#).

6. FINANCIAL REQUIREMENTS

6.1. OCJP grants are governed by the provisions of the Office of Management and Budget (OMB) Uniform Guidance applicable to financial assistance. The sub-recipient must follow [OMB Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements](#) (Uniform Guidance). Additional information and guidance are contained in the fund source chapters of the OCJP Grants Manual available from the Office of Criminal Justice Programs upon award of grant funds or by referring to the [OCJP Grants Manual](#). This policy manual provides information on allowed costs, methods of payment, audit requirements, accounting systems, and financial records. Specific requirements include:

- 6.1.1. Accounting Systems: A grant accounting system must be in place and financial records must accurately account for funds awarded to them. The system must have a financial management module in place that is able to record and report on the receipt, obligation, and expenditure of grant funds. This includes ability to track grant funds separately from other funds. There should be a system in place that can accurately track employee's time charged to the grant. Accounting policies and procedures should be documented and in use, this includes payroll and purchasing policies that reflect good internal controls.
- 6.1.2. Cost Allocation Plan: If any part of the costs to be reimbursed are joint costs involving allocation to more than one program or activity, a cost allocation plan must be submitted and approved by the subrecipient's cognizant agency. The subrecipient's cognizant agency is the agency whose funds comprise the greatest percentage of grant funds received by the Subrecipient. Cost Allocation Plans must comply with the applicable accounting and financial standards, either Financial Accounting Standards Board ("FASB") standards or Governmental Accounting Standards Board ("GASB") standards. Methods used for allocating costs may differ between Subrecipients. It should be noted that grantors are not required to fully fund the costs that are charged to a particular program under an approved Cost Allocation Plan if such costs are not allowable under the contract with the Subrecipient or exceed the prescribed funding percentage or budgets.

Subrecipients will adhere to the CPO Policy 2013-007 (posted online at <https://www.tn.gov/generalservices/procurement/central-procurement-office--cpo-/library-.html>) for Cost Allocation Plans for Subrecipients of Federal and State Grant Monies.

Each budget object line-item expense is defined by the U.S. OMB's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart E Cost Principles (posted on the Internet at: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E>) and CPO Policy 2013-007 (posted online at <https://www.tn.gov/generalservices/procurement/central-procurement-office--cpo-/library-.html>).

The requirements for the development and submission of indirect cost proposals and cost allocation plans are set out in Appendices III – VI of 2 C.F.R. Part 200, for subrecipients that are a state department, city, county (and subdivision thereof) and state college, university, and technology center. These subrecipients should follow the guidelines applicable to its type of organization.

[2 C.F.R. § 200, Appendix III for Institutions of Higher Education](#)

[2 C.F.R. § 200, Appendix V for State/Local Government Central Service Cost Allocation Plans](#)

[2 C.F.R. § 200, Appendix VII for State/Local/Tribal Indirect Cost Proposals](#)

For additional information regarding cost allocation plans, please refer to [Chapter XVI – Cost Allocation](#) of the OCJP grants manual.

- 6.1.3. Indirect Cost Rate: Should the subrecipient request reimbursement for indirect costs, the Subrecipient must submit to the State a copy of the indirect cost rate approved by the cognizant federal agency or the cognizant state agency, as applicable. The Subrecipient will be reimbursed for indirect costs in accordance with the approved indirect cost rate and amounts and limitations

specified in the grant budget. Once the subrecipient makes an election and treats a given cost as direct or indirect, it must apply that treatment consistently and may not change during the contract period. Any changes in the approved indirect cost rate must have prior approval of the cognizant federal agency or the cognizant state agency, as applicable. If the indirect cost rate is provisional during the contract period, once the rate becomes final, the subrecipient agrees to remit any overpayment of funds to the State, and subject to the availability of funds the State agrees to remit any underpayment to the subrecipient. **Indirect costs cannot be used as match. If electing to use the De Minimis rate, fill out and submit with application [the certification of De Minimis rate](#)**

- 6.1.4. **Multiple Year Contracting:** Multiple year contracting reduces unneeded paperwork and duplication for OCJP, as well as the sub-recipient's office. This reduction in bureaucratic paperwork allows the sub-recipient more time to spend on project implementation and evaluation, while allowing OCJP more time to provide oversight, technical assistance and evaluation of individual projects and OCJP programs. **Multiple year contracts will remain contingent, as always, on the availability of federal and state appropriations.**
- 6.1.5. **State Agency Applicants:** State agency applicants (executive, judicial or legislative branch agencies) must notify their Department of Finance and Administration budget analyst at the time the OCJP application is submitted of their intentions to apply for a grant. This Division of Budget notification is required so that necessary steps can be taken to include the grant in the agency's state budget should the state agency receive an award granted from OCJP.

NOTE: State agencies procuring information technology must obtain formal support of procurement from Strategic Technology Solutions (STS) in the Department of Finance and Administration prior to the signing of the grant contract with OCJP.

- 6.1.6. **Solvency:** Agencies not solvent at the time of application are not eligible to apply for funding.
- 6.1.7. **Reporting Irregularities:** The subrecipient is responsible for promptly notifying OCJP and the State of Tennessee Comptroller of any illegal acts or irregularities and or proposed actual actions. Please notify the State of Tennessee Comptroller Hotline at 1-800-232-5454 of any irregularities that occur. Illegal acts include: conflicts of interest, falsification of records or reports, misappropriation of funds or other assets, and/or fraud, waste or abuse. For additional information, please refer to the Tennessee Comptroller of the Treasury website here: <http://www.comptroller.tn.gov/la/LGSfraudReporting.asp>.

7. REPORTING REQUIREMENTS

The sub-recipient must collect, maintain, and provide to OCJP, data that measure the performance and effectiveness of activities under this award, in the manner, and within the timeframes, specified in the program solicitation, or as otherwise specified by OCJP. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act, and other applicable laws.

Complete reporting requirements can be found in the [PSN](#), Fund Source Chapter of the OCJP Grants Manual and in the [PSN](#), Reporting Table. The data collected should support the information submitted on the reports and OCJP may periodically request to see the back-up data that supports the information submitted.

Any additional reports required will be determined by the scope of the project.

7.1. Programmatic Reporting

7.1.1. Quarterly Performance Measures Reports: Project Directors will submit the applicable required Quarterly Performance Report online at <https://ojpsso.ojp.gov/> no later than 15 days past the end of each state fiscal year quarter, (July 1 - September 30), (October 1 - December 31), (January 1 - March 31), (April 1 - June 30). Project Directors will email a copy of the report to their program manager by the same date.

7.1.2. Annual Project Reports: Project Directors will submit the applicable required Annual Project Report to the OCJP **no later than July 31st**. These reports provide the Project Director an opportunity to describe both in narrative and quantitative fashion the success of their project. These reports are submitted online at the following link: [PSN Reports](#).

7.2. Fiscal Reporting

Sub-recipient agencies must request reimbursement at least once per quarter based on expenditures incurred. However, it is recommended that agencies invoice monthly, when monthly expenditures are incurred.

7.2.1. Invoice for Reimbursement (Non-state Agencies): The invoice is used to request monthly reimbursement. It is **strongly recommended** that agencies invoice monthly, when monthly expenditures are incurred. However, subrecipient agencies can invoice quarterly. If invoicing quarterly, agencies **MUST request reimbursement 30 days after the end of each quarter for all the expenses incurred during the quarter in its entirety**. Funds can only be distributed to sub-recipients upon receipt of a properly prepared and signed invoice. The invoices are emailed to the Office of Business and Finance of the Department of Finance and Administration.

7.2.2. State of Tennessee Inter/Unit Journals (State Agencies Only): This method of payment is used for grants funded to State agencies. This payment method reimburses the sub-recipient based upon actual costs incurred by the sub-recipient in carrying out the activity of the grant. As the sub-recipient incurs costs, those costs are conveyed to the funding source (OCJP) following the State of Tennessee Inter/Unit Journal process described below. Following the IU processing, deposits (reimbursement) via the recognition of revenue are made to the account of the state sub-recipient.

7.2.3. Quarterly Program Income Summary Report (State and Local Governments Only): Agencies should be aware of and comply with reporting Program Income as defined in the [Department of Justice Financial Guide](#). The Quarterly Program Income Summary Report is due quarterly no later than fifteen (15) calendar days after the close of each State fiscal year quarter (July 1 - September 30), (October 1 - December 31), (January 1 - March 31), (April 1 - June 30). If the project **does not earn income**, then the agency may submit an annual report due no later than fifteen (15) days after the end of the fiscal year or end of the grant period. These reports are completed online at the following link: [Income Summary Report](#).

7.2.4. Project Equipment Summary Report: This report is completed on an annual basis, if equipment or "Sensitive Minor Equipment" (see [OCJP Grants Manual Chapter X](#)-Property and Equipment for definition) is purchased with grant funds during the current fiscal year. It is due to OCJP no later than

thirty (30) calendar days past the end of the State fiscal year or July 31st. For new projects, the Project Equipment Summary Report should list new or start-up equipment purchases. For multi-year projects, the Project Equipment Summary Report should specifically identify any purchases that have been made for equipment, either totally or in part with grant money, since the last fiscal year. This report is available for online submission at https://stateoftennessee.formstack.com/forms/project_equipment_summary_report.

7.3. Fiscal and Program Monitoring

The Office of Criminal Justice Programs program managers and fiscal monitors provide routine program and fiscal monitoring of all OCJP contracts. This monitoring provides program and fiscal contract compliance review, much needed information on how the program is actually being implemented, and assists in identifying sub-recipients experiencing problems requiring corrective action. If through monitoring a problem area is identified and corrective action is requested, OCJP sub-recipients must adhere to the corrective action requirements identified in the [OCJP Grants Manual Chapter XIX. D](#) within the time period required.

8. APPLICATION EVALUATION

8.1. Review and Evaluation of Proposals

Each application will be rated, utilizing a “weighted” review tool, based on the applicant agency’s ability to provide a logical description of how their project theoretically works to benefit the target group. The project description must tie goals, activities, outputs, and outcomes together in a logical fashion. Applications will be reviewed for financial and programmatic completeness by OCJP staff with expertise in grant requirements and program design. The applications will be rated and funding will be determined through a competitive review process by a review team of professionals knowledgeable in applicable subject material. Grants will be awarded based on current funding patterns, the availability of funds, and the above cited criteria.

All competitive applications will undergo a final review by OCJP Staff and applicants will be notified of approval or denial by the date listed below. If an application is approved, the contract between the state and the sub-recipient will be emailed with the approval letter. The contract **must** be signed by the Authorized Official and returned to the Office of Criminal Justice Programs for approval by the Commissioner of Finance and Administration. After the Commissioner approves the contract, an executed original contract will be emailed to the sub-recipient.

Applicants will be notified whether their application is approved for funding prior to the start date identified in this solicitation.

8.2. Grant Solicitation Update

The State at its sole discretion may update this Grant Solicitation, in writing, at any time prior to contract award. However, prior to any such update, the State will consider whether it would negatively impact the ability of potential Applicants to meet the response deadline and revise the Grant Solicitation Schedule of Events if deemed appropriate. If a Grant Solicitation update is issued, the State will convey it to potential Applicants who submitted a Notice of Intent to Apply (refer to Grant Solicitation Section 1.5). A response must address the final Grant Solicitation (including its attachments) as updated.

Scope of Services/Project Narrative

PSN Middle

Implementing Agency: Metropolitan Nashville Police Department

PROBLEMS FOR INTERVENTION AND NEEDS TO BE IMPROVED

Problem Description – What is the nature and magnitude of the problem(s) to be solved by the proposed funding? This should be based on your agency's own data and/or other relevant sources and describe in detail the most pressing problems in your service/impact area. The problem statement should also identify the needs of the community based on relevant and timely data. This should be light on demographics and geography. (See *Open Solicitation Blurb for project requirements*)

Gun Violence in Nashville continues to be a focus of the MNPD as its impact is devastating to the community and families involved. Through the use of NIBIN, we can see the retaliatory cycle of violence created by individual acts of gun violence.

Nashville and Davidson County have experienced homicide occurrences by more than 100 logged per year in the past five years with less than 1% in average decrease over time. Compared to previous years 2018 and 2019, homicide rates were only more than 80 and less than 100. From 2020 to 2023, there were between 466 and 538 gunshot victims every year – an average of 89 victims more than the past 10-year average of just 412. This year, 2024, we have already cataloged 34 victims of gunshot injuries reported [as of 2/7/2024] which is a little less than 2023 at this point when there were 44. However, the average decrease rate from 2020 to 2023 in gunshot injuries reported is significantly low (3.6%).

Since 2020, our department had 3,713 NIBIN related incidents (serial & forensically linked gun violence). 39.5% (1,468) of these are violent crimes classified as Aggravated Assault, Robbery, or Homicide. There are 73 patrol zones represented across the 8 precincts within Davidson County. All our zones have had NIBIN related incidents occur in them. 74%, (2,751) of the total incidents, were in 4 precincts – East, Hermitage, North and South. Half (50.66%) of the total NIBIN related incidents occurred in just one quarter of the patrol zones. This indicates that the gun violence is concentrated in smaller, denser parts of the city and in return is disproportionately affecting those communities.

Looking at suspects arrested in gunshot wound incidents during 2023 combined with subjects involved in multiple NIBIN related incidents, this demonstrates an overlap in a social network analysis as documented by data such as arrest reports and field interviews. They create a network of 582 people involved in these behaviors. Of those 582, over 25% (156) are in a singular component within the network and 63 individuals are confirmed gang members. This is a significant amount of interconnected violent subjects and a high concentration of gang members in one violent network with documented ties to each other.

An increase in focus on these NIBIN related investigative leads and the intelligence derived from the data would enable the department to interrupt these shooting cycles, focus investigative efforts on suspects willing to use a gun, decrease gun related violence, disrupt organized criminal groups and gangs, and increase the quality of life for the citizens in these areas most affected.

**ATTACHMENT A
APPLICATION FOR FUNDING
GRANT PROJECT NARRATIVE
(Narrative Page 2)**

ELIGIBILITY

Eligible subrecipients are limited to the Metropolitan Government of Nashville-Davidson County. Please list your county and agency name below.

Nashville, Davidson County – Metropolitan Nashville Police Department

Applicants must designate 30% of their funding for gang task force work to include strategies to reduce violent crime, firearms offenses, human trafficking, and drug trafficking. Please describe the strategies your agency will utilize to reduce violent crime, firearms offenses, human trafficking, and drug trafficking? How will you address these issues regarding gangs?

It is known and in fact codified into law what kinds of crime that gangs and associated criminal groups are involved. Those types of criminal gang offenses are related to violence, weapons, human trafficking, and drug trafficking. We will use constant analysis of data on multiple fronts to identify the most active of these criminal groups as well as the most active individuals within these groups and conduct enforcement and investigations to disrupt this activity. For example, using data from NIBIN, drug arrests, prostitution arrests, field interviews, gang databases, TDOC releases, ATF eTrace data, and analysis of these networks to address these issues.

Please explain your agency's background in measurement, analysis, and improvement or organizational performance. How do you track data and information as it relates to violent crime, firearms, human and drug trafficking and gang activity? How do you measure organizational performance related to these key performance metrics?

The department already has extensive data tracking mechanisms using the records management system (RMS) that update daily and weekly that will allow us to quickly ascertain which established gangs have the highest levels of membership and whether or not those members are related to violent acts.

The department also actively tracks firearms arrests that occur on a daily basis and has a system of communication in place facilitating a constant dialogue with federal and state prosecutors to determine the best course of prosecution to prevent further offenses.

The MNPD has also formed a NIBIN / Gang Intelligence Team within the Specialized Investigations Division to intensely focus on the processing and investigation of NIBIN related groupings along with building the intelligence related to Nashville gangs. Other investigative units like the T.I.T.A.N.S. (The Investigative Teams Addressing Neighborhood Shootings), Violent Crimes Division, Centralized Homicide team, and the Non-Lethal Shooting Team all coordinate and share information to identify and arrest subjects committing violent crimes.

PURPOSE

This section should include goals and objectives of the project.

Goals – The goals are the general statement of long-range benefits to the client or community that you are seeking to accomplish. The goal should tie back to your needs statement.

Goal 1 - The goal is to reduce gun violence and related injuries to multi-year lows using NIBIN, ATF eTrace, data and network analysis, thorough investigation and undercover operations and reduce the ability of active gangs in Nashville to perpetuate criminal gang offenses such as weapons offenses, robbery, homicide, nonlethal shootings, human trafficking and drug offenses.

ATTACHMENT A
APPLICATION FOR FUNDING
GRANT PROJECT NARRATIVE
(Narrative Page 3)

Objectives – The objectives are the general strategies (not specific activities) to be employed to accomplish the above stated goals. Objectives should be S.M.A.R.T. (Specific, Measurable, Achievable, Relevant, and Time Sensitive). There should be no more than three objectives. The objective ties to the goal, which links to the needs statement. A possible objective for this project: *By June 30, 2025, enhance the ability of the Metro Nashville Police Department's Specialized Investigations Division's Titans Unit to combat gang related crime through active suppression, investigation, and intelligence gathering leading to a 20% increase in arrests, prosecutions, and convictions of identified gang offenders.*

Objective 1: By the end of the project, the MNPD will have enhanced its use of data analysis and law enforcement relationships to reduce the number of gunshot wound victims in Nashville to multi-year lows.

Objective 2: To reduce the number of homicides that occur during the project period by at least 10 percent by using an intense focus of investigation and enforcement measures into NIBIN related incidents with emphasis on incidents (at least 30% of funding) involving confirmed gang members.

ACTIVITIES

Activities are what a project does with the inputs to meet the goals and objectives of the project. This section should describe the planned activities, that are needed to complete the project by June 30, 2024. You should describe the activities to be employed by the project to achieve the desired results. For projects requesting multi-year funding, describe and delineate how activities may change over the period of the grant if at all. Link the activities to the stated Objectives listed above. Repeat the section below as necessary.

The project will be overseen and directed by Sgt. Christopher Turner of the Specialized Investigations Division.

On a quarterly basis an analysis will be conducted using data from RMS relating to gunshot wound incidents, NIBIN related incidents in the MNPD built database, and information recorded of known gang members to extract cohesive criminal networks in order to identify the key individuals that are involved. Investigation and enforcement measures will be taken to disrupt the activities of these key individuals to achieve both objective #1 and #2. The investigations and enforcement measures will be funded in the form of overtime funding provided by this grant.

IMPLEMENTATION TIMELINE FOR ACCOMPLISHING KEY GRANT ACTIVITIES

This section should include a comprehensive timeline with concrete implementation and execution dates. The structure of the timeline should be feasible and outline the best scenario for achieving goals and objectives. Please add additional lines as necessary.

Activity/ Output	Position of Person Completing	Due Date for Completion
Training for community engagement	Sgt. Turner and Designees	Within 60 days of project implementation
Reduction of GSW victims to lows	MNPD Personnel	By End of project
10% reduction in homicides	MNPD Personnel	By End of project

ATTACHMENT A
APPLICATION FOR FUNDING
GRANT PROJECT NARRATIVE
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INPUTS

This section should describe what your proposal relies upon to complete the project. The inputs are the staff, the donated items, etc. that your project already has that will contribute to the success of the proposed project. Provide a brief description of grant funded position's responsibilities.

All personnel involved will be POST certified police officers employed by the MNPDP with jurisdiction over the affected areas. Training pertaining to NIBIN, and ATF eTrace will be provided to personnel using grant funds if they have not received the training or worked consistently with NIBIN related information within the last 36 months.

Describe the strengths your agency has in reducing violent crime, firearms offenses, human trafficking, and drug trafficking.

The Chief of Police has consistently placed an emphasis on being precise with our preventive and investigative efforts. Because of this the department has invested heavily on the availability of data in all crime types enabling us to conduct a myriad of analysis to address crime problems of all types. The department has also invested in the training and hiring of crime analysts that can assist in this endeavor. To combine this with our crime lab's ability to produce quick NIBIN related leads and the consistent use of ATF eTrace and information about gang activity will empower us to act efficiently and precisely so as to focus our efforts on the most prone to violence in our communities.

Describe the strengths your agency has in addressing gang activity?

The MNPDP has consistently tracked and maintained detailed information about criminal gangs in Nashville. The MNPDP first began gathering this information in 2006 and has never stopped. The MNPDP has also developed and consistently used an objective method of gang membership confirmation that removes personal bias and subjectivity in its evaluation. This enables personnel to have access to reliable information that is accurate and is consistent with national policy in the maintenance of these records. The MNPDP also has established relationships with adult and juvenile probation, community groups, and prosecutors at all levels that can address this issue.

List the staff positions that will be paid for with this grant, and explain any special degrees, educational requirements or experience that are requirements of the grant-funded positions. In addition to this grant, what other resources are being offered by your agency? Outline the organizational structure including all who work with the project regardless of whether or not their salaries are grant funded. To what extent would this grant affect the overall project budget? Would this grant fund the entire project or are there other resources that would be leveraged to benefit this project? Give some detail.

MNPDP personnel within and outside of the specialized investigations division will be eligible for grant funded overtime to accomplish our objectives and will only require the training that has been developed over the last several years by specialist investigators that have used the NIBIN information since 2015 if they have not already attended the training or worked extensively with the NIBIN related information in the last 36 months as determined by Sgt. Christopher Turner (project director).

**ATTACHMENT A
APPLICATION FOR FUNDING
GRANT PROJECT NARRATIVE
(Narrative Page 5)**

DATA COLLECTION PROCEDURE

Describe the data collection procedures you will undertake to collect and report the outputs and outcomes of the planned services or interventions. E.g. number of active gangs, gang financing methods, law enforcement functions performed, volume of gang prevention activities, trends related to gangs and violent crime commission, specialized training for law enforcement officers, surveys, or case records, etc. Describe how you will document your activities and collect the data you will report for the quarterly PMT reports and OCJP Annual Report. Questions to be answered are who will collect the data as well as how and when. In addition, describe how your agency will use the data collected to evaluate the goals of the project and the work performed and plan accordingly.

The activities described for objective #1 and #2 will require data collection for adherence to our stated goals. Objective #1 describes a quarterly analysis. This analysis will be saved by quarter for reference along with a timeline of activity where actions were taken using the details of the analysis. In addition, a statistical record of arrests, seizures, reports, gang status, etc will be kept coinciding with the time of activity. The analysis, timeline, and statistical tracking will be kept separately in each of the quarters during the duration of the grant project. The analysis will involve NIBIN related people and incidents, arrest data, field interview data and gang information. For clarification if there are 8 quarters for this grant project there will be 8 different groups of data that include the aforementioned items and retained for record keeping. Sgt. Christopher Turner will be responsible for maintaining the records that will be available for review.

COLLABORATION ACTIVITIES (REQUIRED)

Collaboration is defined as a mutually beneficial and well-defined relationship entered into by two or more organizations to achieve results, they are more likely to achieve together than alone. Collaboration should describe the ongoing working relationship where ideas are exchanged a common purpose and common goals are planned and attained. **All applicants are strongly encouraged to collaborate with other agencies to achieve similar goals.**

MNPD personnel will work extensively with our established partners in juvenile probation, the TDOC, state and federal prosecutors as well as our law enforcement partners such as but not limited to the FBI, DEA, ATF, HSI, Murfreesboro Police Department, and other surrounding agencies to accomplish our objectives. We will also consistently work with the MNPD Crime lab using the NIBIN leads they provide and to assist the lab in continuing the ability to produce the leads by apportioning some of the grant funding to the lab to purchase another NIBIN related Comparison Microscope.

INTENDED OUTPUTS (Products)

This section should describe the outputs or internal measures of the amount of work done within the project. **Outputs are the direct products of program activities** and usually are measured in terms of the volume of work accomplished. Outputs refer to the completion of tasks you are required to accomplish over the course of the project. A minimum of three outputs are required.

There will be multiple outputs tracked during this project. The following will be tracked although this list is not limited to these outputs:

- **Number of arrests made**
- **Guns seized**
- **Gang members arrested**
- **Search warrants executed**
- **Drugs seized**

**ATTACHMENT A
APPLICATION FOR FUNDING
GRANT PROJECT NARRATIVE
(Narrative Page 6)**

INTENDED OUTCOMES (Results)

Outcomes describe the difference the project will make for its participants and/or the community as a whole. The outcomes for a project should be **measurable** based upon a set of defined criteria. Project goals should be set for each criterion. For projects requesting multi-year funding, describe how outcomes may be expected to change over the period of the grant.

Reduction of GSW injuries to new multi-year lows which can be defined by affecting the number of GSW injuries recorded to amounts similar to 2018 and 2019 or around 400 during the grant period.

Reduction in numbers of homicides committed by 10% using 2022 totals as the standard (approximately 108).

UPON COMPLETION OF THIS SCOPE OF SERVICE/NARRATIVE SAVE A COPY AND SUBMIT IT ALONG WITH YOUR BUDGET FORM TO OCJP VIA THE E-MAIL NOTED IN SOLICITATION.



Tennessee Department of Finance and Administration
 Office of Criminal Justice Programs
 312 Rosa Parks Ave, Ste. 1800
 Nashville, TN 37243-1102

Certification Regarding Research and Evaluation Independence and Integrity

This certification is required because project #26635 involves research and/or evaluation, and the Bureau of Justice Assistance requires that project staff demonstrate research/evaluation independence, including appropriate safeguards to ensure research/evaluation objectivity and integrity, both in this proposal and as it may relate to the applicant's other current or prior related projects. This certification addresses any potential conflicts of interest which may exist between agency staff that are participating in either the assessment of pretrial risk assessment pilot sites, or the provision of technical assistance and evaluation services at the pilot sites once they are selected and granted sub-awards through the Tennessee Office of Criminal Justice Programs.

Please check either option (a) or option (b) and provide any applicable supporting documentation for both sections (i) and (ii) as it relates to this funded project #26635 and its relationship to each of the potential applicant communities being considered for funding as pretrial risk assessment pilot sites listed below.

i. For purposes of this solicitation, applicants must document research and evaluation independence and integrity by including, at a minimum, one of the following two items:

- a. The grantee has reviewed its proposal to identify any research integrity issues (including all principal investigators and sub-recipients) and it has concluded that the design, conduct, or reporting of research and evaluation funded by BJA grants, cooperative agreements, or contracts will not be biased by any personal or financial conflict of interest on the part of part of its staff, consultants, and/or sub-recipients responsible for the research and evaluation or on the part of the applicant organization;

OR

- b. The grantee will provide a specific listing of actual or perceived conflicts of interest that the grantee has identified in relation to this project. These conflicts could be either personal (related to specific staff, consultants, and/or sub-recipients) or organizational (related to the applicant or any subgrantee organization). Examples of potential investigator (or other personal) conflict situations may include, but are not limited to, those in which an investigator would be in a position to evaluate a spouse's work product (actual conflict), or an investigator would be in a position to evaluate the work of a former or current colleague (potential apparent conflict). With regard to potential organizational conflicts of interest, as one example, generally an organization could not be given a grant to evaluate a project if that organization had itself provided substantial prior technical assistance to that specific project or a location implementing the project (whether funded by OJP or other sources), as the organization in such an instance would appear to be evaluating the effectiveness of its own prior work. The key is whether a reasonable person understanding all of the facts would be able to have confidence that the results of any research or

evaluation project are objective and reliable. Any outside personal or financial interest that casts doubt on that objectivity and reliability of an evaluation or research product is a problem and must be disclosed.

ii. In addition, for purposes of this award the grantee must address the issue of possible mitigation of research integrity concerns by including, at a minimum, one of the following two items:

a. If a grantee reasonably believes that no potential personal or organizational conflicts of interest exist, then they should provide a brief narrative explanation of how and why it reached that conclusion. The grantee MUST also include an explanation of the specific processes and procedures that the applicant will put in place to identify and eliminate (or, at the very least, mitigate) potential personal or financial conflicts of interest on the part of its staff, consultants, and/or sub-recipients for this particular project, should that be necessary during the grant period. Documentation that may be helpful in this regard could include organizational codes of ethics/conduct or policies regarding organizational, personal, and financial conflicts of interest.

OR

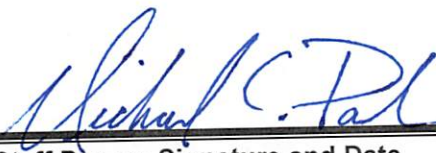
b. If the grantee has identified specific personal or organizational conflicts of interest in its proposal during this review, the applicant must propose a specific and robust mitigation plan to address conflicts noted above. At a minimum, the plan must include specific processes and procedures that the applicant will put in place to eliminate (or, at the very least, mitigate) potential personal or financial conflicts of interest on the part of its staff, consultants, and/or sub-recipients for this particular project, should that be necessary during the grant period. Documentation that may be helpful in this regard could include organizational codes of ethics/conduct or policies regarding organizational, personal, and financial conflicts of interest. There is no guarantee that the plan, if any, will be accepted as proposed.

Considerations in assessing research and evaluation independence and integrity will include, but are not be limited to, the adequacy of the applicant's efforts to identify factors that could affect the objectivity or integrity of the proposed staff and/or the organization in carrying out the research, development, or evaluation activity; and the adequacy of the applicant's existing or proposed remedies to control any such factors.

The project staff member listed below certifies that to the best of his or her knowledge and belief that the information contained in this certification is correct and in accordance with the requirements of the grant guidelines.

Michael C. Park Sergeant

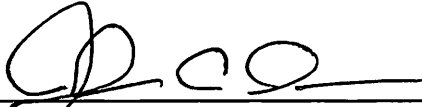
Staff Name and Title (Printed)

 02/26/24

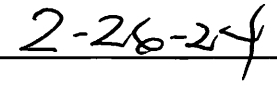
Staff Person Signature and Date

**APPLICATION SIGNATURE PAGE
FOR
APPLICATION FOR 2024 PSN Middle Grant**

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



Director
Department of **Police Department**



Date

GRANT BUDGET				
AGENCY NAME: Metro Government of Nashville and Davidson County				
FUND SOURCE: CFDA 16.609				
SOLICITATION IDENTIFICATION TITLE: Middle TN Project Safe Neighborhoods				
The grant budget line-item amounts below shall be applicable only to expense incurred during the following Applicable Period: BEGIN: 07/01/2024 END: 06/30/2025				
POLICY 03 Object Line-Item Reference	EXPENSE OBJECT LINE-ITEM CATEGORY ¹	GRANT CONTRACT	GRANTEE PARTICIPATION	TOTAL PROJECT
1, 2	Salaries, Benefits & Taxes ²	\$159,172.00	\$0.00	\$159,172.00
4, 15	Professional Fee, Grant & Award ²	\$0.00	\$0.00	\$0.00
5, 6, 7, 8, 9, 10	Supplies, Telephone, Postage & Shipping, Occupancy, Equipment Rental & Maintenance, Printing & Publications ²	\$0.00	\$0.00	\$0.00
11, 12	Travel, Conferences & Meetings ²	\$0.00	\$0.00	\$0.00
13	Interest ²	\$0.00	\$0.00	\$0.00
14	Insurance ²	\$0.00	\$0.00	\$0.00
16	Specific Assistance To Individuals ²	\$0.00	\$0.00	\$0.00
17	Depreciation ²	\$0.00	\$0.00	\$0.00
18	Other Non-Personnel ²	\$0.00	\$0.00	\$0.00
20	Capital Purchase ²	\$0.00	\$0.00	\$0.00
22	Indirect Cost ²	\$0.00	\$0.00	\$0.00
24	In-Kind Expense ²	\$0.00	\$0.00	\$0.00
25	GRAND TOTAL	\$159,172.00	\$0.00	\$159,172.00

¹ Each expense object line-item shall be defined by the Department of Finance and Administration Policy 03, *Uniform Reporting Requirements and Cost Allocation Plans for Subrecipients of Federal and State Grant Monies, Appendix A.* ([posted on the Internet at: https://www.tn.gov/content/dam/tn/finance/ocjp/Appendix_J_Policy_03_Report.xls](https://www.tn.gov/content/dam/tn/finance/ocjp/Appendix_J_Policy_03_Report.xls))

² Applicable detail follows this page if line-item is funded.

GRANT BUDGET LINE-ITEM DETAIL:

AGENCY NAME: Metro Government of Nashville and Davidson County

FUND SOURCE: CFDA 16.609

SOLICITATION IDENTIFICATION TITLE: Middle TN Project Safe Neighborhoods

SALARIES, BENEFITS & TAXES	AMOUNT
	\$0.00
1 Lieutenant assigned to the Specialized Investigations Division (SID) Overtime related to PSN	\$30,700.00
6 Sergeants assigned to the SID TITANS teams including SGT Winter of TITANS to oversee administered funds and investigative follow-up. Up to 36 detectives (Police Officer II) assigned to SID TITANS teams to execute PSN initiatives.	\$128,472.00
	\$0.00
	\$0.00
TOTAL	\$159,172.00

Note: Benefits must be calculated at the same or lesser percentage as the salary for each position.

PROFESSIONAL FEE, GRANT & AWARD	AMOUNT
	\$0.00
	\$0.00
	\$0.00
TOTAL	\$0.00

SUPPLIES (includes "Sensitive Minor Equipment"), TELEPHONE, POSTAGE & SHIPPING, OCCUPANCY, EQUIPMENT RENTAL & MAINTENANCE, PRINTING & PUBLICATION	AMOUNT
Occupancy: <i><Please provide description here></i>	\$0.00
Supplies: <i><Please provide description here></i>	\$0.00
Sensitive Minor Equipment: <i><Please provide description here></i>	\$0.00
All Other Items: <i><Please provide description here></i>	\$0.00
Repeat row(s) as Necessary	\$0.00
TOTAL	\$0.00

TRAVEL, CONFERENCES & MEETINGS	AMOUNT
Local Travel: <i><Please provide description here></i>	\$0.00
Training and Conferences Attended by Agency Staff: <i><Please provide description here></i>	\$0.00
Training and Conferences Implemented by Agency: <i><Please provide description here></i>	\$0.00
Repeat row(s) as Necessary	\$0.00
TOTAL	\$0.00

INSURANCE	AMOUNT
Description of Insurance: <i><Please provide description of Insurance here></i>	\$0.00
TOTAL	\$0.00

SPECIFIC ASSISTANCE TO INDIVIDUALS	AMOUNT
Description of Specific Assistance to Individuals: <i><Please provide descriptions of Specific Assistance to Individuals here></i>	\$0.00
Repeat row(s) as Necessary	\$0.00
TOTAL	\$0.00

DEPRECIATION	AMOUNT
Must provide depreciation schedule.	\$0.00
TOTAL	\$0.00

OTHER NON-PERSONNEL	AMOUNT
Prior approval required by OCJP before budgeting in this line. Specific, Descriptive, Detail required. <i><Please provide description here></i>	\$0.00
TOTAL	\$0.00

CAPITAL PURCHASE	AMOUNT
Description of Capital Purchases: Leica FSC comparison microscope and imaging station (federal portion \$65,000.00)	\$0.00
TOTAL	\$0.00

INDIRECT COST	AMOUNT
Description of Indirect Costs: <Please provide description of Indirect Costs here> cannot be match	\$0.00
TOTAL	\$0.00

IN-KIND EXPENSE	AMOUNT
Volunteer Time: <Please provide description here>	\$0.00
Donated Space: <Please provide description here>	\$0.00
Donated Goods: <Please provide description here>	\$0.00
Repeat row(s) as Necessary - CANNOT BE ANY FORM OF CASH MATCH	\$0.00
TOTAL	\$0.00

Certificate Of Completion

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Status: Completed

Subject: Complete with DocuSign: POLICE~3.PDF

Source Envelope:

Document Pages: 38

Signatures: 3

Envelope Originator:

Certificate Pages: 15

Initials: 1

Juanita Paulson

AutoNav: Enabled

730 2nd Ave. South 1st Floor

Envelope Stamping: Enabled

Nashville, TN 37219

Time Zone: (UTC-06:00) Central Time (US & Canada)

Juanita.Paulsen@nashville.gov

IP Address: 170.190.198.185

Record Tracking

Status: Original

Holder: Juanita Paulson

Location: DocuSign

3/12/2024 3:42:22 PM

Juanita.Paulsen@nashville.gov

Security Appliance Status: Connected

Pool: StateLocal

Storage Appliance Status: Connected

Pool: Metropolitan Government of Nashville and Davidson County

Location: DocuSign

Signer Events**Signature****Timestamp**

Ernest Franklin

Ernest.Franklin@nashville.gov

Security Level: Email, Account Authentication (None)



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Aaron Pratt

Aaron.Pratt@nashville.gov

Security Level: Email, Account Authentication (None)



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Electronic Record and Signature Disclosure:

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Kevin Crumbo/mjw

MaryJo.Wiggins@nashville.gov

Security Level: Email, Account Authentication (None)



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Electronic Record and Signature Disclosure:

Accepted: 3/13/2024 3:53:40 PM

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Courtney Mohan

Courtney.Mohan@nashville.gov

Security Level: Email, Account Authentication (None)



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Signature Adoption: Pre-selected Style

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Agent Delivery Events	Status	Timestamp
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Intermediary Delivery Events	Status	Timestamp
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Certified Delivery Events	Status	Timestamp
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Carbon Copy Events	Status	Timestamp
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Danielle Godin
Danielle.Godin@nashville.gov
Security Level: Email, Account Authentication (None)
Electronic Record and Signature Disclosure:
Not Offered via DocuSign

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Sally Palmer
sally.palmer@nashville.gov
Security Level: Email, Account Authentication (None)
Electronic Record and Signature Disclosure:
Accepted: 3/13/2024 11:59:23 AM
ID: 99cc1d5d-3e4d-4c64-9ed4-d0da4495d508

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Notary Events	Signature	Timestamp
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Payment Events	Status	Timestamps
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Electronic Record and Signature Disclosure
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