
GRANT SUMMARY SHEET

Grant Name: Cherished HEARTS Court Expansion and Enhancement Project
23-27

Department: GENERAL SESSIONS CT

Grantor: U.S. DEPARTMENT OF JUSTICE

**Pass-Through Grantor
(If applicable):**

Total Award this Action: \$930,095.00

Cash Match Amount \$313,401.00

Department Contact: Grace Guerra Woolbright
880-3712

Status: NEW

Program Description:

The Cherished HEARTS Court is specifically designed to reduce revictimization of justice-involved survivors of human trafficking and those risk of sexual exploitation. The Court accepts pre- and post-conviction cases, as well as pre-adjudication cases where the Court's program acts as a condition of bond. Program participants are non-violent, justice-involved individuals with high criminogenic risk and high behavioral health treatment needs suffering from extreme trauma and/or living with substance use disorders or co-occurring mental health issues. The purpose of this project is threefold: 1) create a stand-alone human trafficking Court to strengthen current Court operations and internal capacity, centralize accountability, implement an independent approach for dealing with justice-involved trafficking victims, and develop a more efficient and effective treatment delivery system by adding a staff LCSW; 2) better connect with victims through a peer recovery specialist; and 3) raise community awareness about human trafficking and sexual exploitation through expanded education and outreach efforts.

Plan for continuation of services upon grant expiration:

Cherished H.E.A.R.T.S. will collaborate with Metropolitan Government for Nashville and Davidson County for addition to yearly budge in 2026-2027 and seek other grant oppourtunies as they become available and also seeks assistance from WINGS Foundation.

Grants Tracking Form

Part One

Pre-Application <input type="radio"/>		Application <input type="radio"/>		Award Acceptance <input checked="" type="radio"/>		Contract Amendment <input type="radio"/>	
Department	Dept. No.	Contact		Phone	Fax		
GENERAL SESSIONS CT	027	Grace Guerra Woolbright		880-3712			
Grant Name:		Cherished HEARTS Court Expansion and Enhancement Project 23-27					
Grantor:		U.S. DEPARTMENT OF JUSTICE		Other:			
Grant Period From:		10/01/23	<small>(applications only)</small> Anticipated Application Date:				
Grant Period To:		09/30/27	<small>(applications only)</small> Application Deadline:				
Funding Type:		FED DIRECT	Multi-Department Grant <input type="checkbox"/> If yes, list below.				
Pass-Thru:			Outside Consultant Project: <input checked="" type="checkbox"/>				
Award Type:		COMPETITIVE	Total Award: \$930,095.00				
Status:		NEW	Metro Cash Match: \$313,401.00				
Metro Category:		New Initiative	Metro In-Kind Match: \$0.00				
CFDA #		16.585	Is Council approval required? <input checked="" type="checkbox"/>				
Project Description:		Applic. Submitted Electronically? <input checked="" type="checkbox"/>					
<p>The Cherished HEARTS Court is specifically designed to reduce revictimization of justice- involved survivors of human trafficking and those risk of sexual exploitation. The Court accepts pre- and post-conviction cases, as well as pre-adjudication cases where the Court's program acts as a condition of bond. Program participants are non-violent, justice-involved individuals with high criminogenic risk and high behavioral health treatment needs suffering from extreme trauma and/or living with substance use disorders or co-occurring mental health issues. The purpose of this project is threefold: 1) create a stand-alone human trafficking Court to strengthen current Court operations and internal capacity, centralize accountability, implement an independent approach for dealing with justice-involved trafficking victims, and develop a more efficient and effective treatment/delivery system by adding a staff LCSW; 2) better</p>							
Plan for continuation of service after expiration of grant/Budgetary Impact:							
Cherished H.E.A.R.T.S. will collaborate with Metropolitan Government for Nashville and Davidson County for addition to yearly budge in 2026-2027 and seek other grant oppourtunies as they become available and also seeks assistance from WINGS Foundation.							
How is Match Determined?							
Fixed Amount of \$		or	25.0%	% of Grant		Other: <input type="checkbox"/>	
Explanation for "Other" means of determining match:						N/A	
For this Metro FY, how much of the required local Metro cash match:							
Is already in department budget?		NO		Fund	32227	Business Unit	NEW
Is not budgeted?		Proposed Source of Match:					
(Indicate Match Amount & Source for Remaining Grant Years in Budget Below)							
Other:							
Number of FTEs the grant will fund:		2.00		Actual number of positions added:		2.00	
Departmental Indirect Cost Rate		25.00%		Indirect Cost of Grant to Metro:		\$310,874.00	
*Indirect Costs allowed? <input type="radio"/> Yes <input checked="" type="radio"/> No		% Allow.		Ind. Cost Requested from Grantor:		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	FY24	\$237,139.00			\$116,297.00			\$353,436.00	\$88,359.00	\$0.00
Yr 2	FY25	\$231,112.00			\$89,296.00			\$320,408.00	\$80,102.00	\$0.00
Yr 3	FY26	\$230,922.00			\$89,296.00			\$320,218.00	\$80,054.00	\$0.00
Yr 4	FY27	\$230,922.00			\$18,512.00			\$249,434.00	\$62,359.00	\$0.00
Yr 5	FY__									
Total		\$930,095.00	\$0.00	\$0.00	\$313,401.00		\$0.00	\$1,243,496.00	\$310,874.00	\$0.00
Date Awarded:			10/01/23		Tot. Awarded: \$930,095.00		Contract#: 15PBJA-23-GG-04284-DGCT			
(or) Date Denied:					Reason:					
(or) Date Withdrawn:					Reason:					

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

GCP rec'd
10/17/23

GCP Approved
10/18/23

VW



Department of Justice (DOJ)

Office of Justice Programs

Bureau of Justice Assistance

Washington, D.C. 20531

Name and Address of Recipient: NASHVILLE & DAVIDSON COUNTY, METROPOLITAN GOVERNMENT
OF
1 PUBLIC SQ

City, State and Zip: NASHVILLE, TN 37201

Recipient UEI: LGZLHP6ZHM55

Project Title: Cherished HEARTS
Treatment Expansion Project

Award Number: 15PBJA-23-GG-04284-DGCT

Solicitation Title: BJA FY 2023 Adult Treatment Court Site-Based

Federal Award Amount: \$930,095.00

Federal Award Date: 9/27/23

Awarding Agency: Office of Justice Programs
Bureau of Justice Assistance

Funding Instrument Type: Grant

Opportunity Category: D

Assistance Listing:

16.585 - Treatment Court Discretionary Grant Program

Project Period Start Date: 10/1/23

Project Period End Date: 9/30/27

Budget Period Start Date: 10/1/23

Budget Period End Date: 9/30/27

Project Description:

Metropolitan Government of Nashville and Davidson County (Tennessee) is requesting \$930,095 for its Cherished HEARTS (Healing Enslaved and Repressed Trafficking Survivors) Court Expansion and Enhancement Project. Cherished HEARTS is the General Sessions Human Trafficking Survivors Court serving justice-involved victims of human trafficking and those at risk of sexual exploitation in the Nashville/Davidson County area. Created in 2016, Cherished HEARTS is one of the first sex trafficking intervention courts implemented in the United States. It is the court's policy to conduct all aspects of its program without discrimination of any kind. The purpose of this project is threefold: (1) Create a stand-alone human trafficking court to strengthen current court operations and internal capacity, centralize accountability, implement an independent approach for dealing with justice-involved trafficking victims, and develop a more efficient and effective treatment delivery system by adding a staff LCSW. (2) Better connect with victims through a peer recovery specialist. (3) Raise community awareness about human trafficking and sexual exploitation through expanded education and outreach efforts. The Cherished HEARTS Court is specifically designed to reduce revictimization of justice-involved survivors of human trafficking and those at risk of sexual exploitation. The court accepts pre- and postconviction cases, as well as pre-adjudication cases where the court's program acts as a condition of bond. Program participants are nonviolent, justice-involved individuals with high criminogenic risk and high behavioral health treatment needs suffering from extreme trauma and/or living with substance use disorders or co-occurring mental health issues. Cherished HEARTS is a voluntary treatment-based program that integrates treatment services and judicial supervision for participants with the goal of breaking the cycle of substance use disorders and criminal behavior. Cherished HEARTS uses a five-phase intervention program that lasts up to 24 months: Acute Stabilization, Clinical Stabilization, Pro-social Habilitation, Adoptive Habilitation, and Continuing Care. This project will incrementally serve 35 individuals. Because of the complexities in identifying victims of human trafficking and sexual exploitation, the number of eligible participants is inherently limited. Treatment will be provided using evidence-based practices including medication-assisted treatment, and recovery support services will be provided. The court operates in accordance with each of the National Association of Drug Court Adult Drug Court Best Practice Standards.

Award Letter

September 27, 2023

Dear John Cooper,

On behalf of Attorney General Merrick B. Garland, it is my pleasure to inform you the Office of Justice Programs (OJP) has approved the application submitted by NASHVILLE & DAVIDSON COUNTY, METROPOLITAN GOVERNMENT OF for an award under the funding opportunity entitled 2023 BJA FY 2023 Adult Treatment Court Site-Based. The approved award amount is \$930,095.

Review the Award Instrument below carefully and familiarize yourself with all conditions and requirements before accepting your award. The Award Instrument includes the Award Offer (Award Information, Project Information, Financial Information, and Award Conditions) and Award Acceptance. For COPS Office and OVW funding the Award Offer also includes any Other Award Documents.

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

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

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

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

Congratulations, and we look forward to working with you.

Amy Solomon

Assistant Attorney General

Office for Civil Rights Notice for All Recipients

The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) has been delegated the responsibility for ensuring that recipients of federal financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) are not engaged in discrimination prohibited by law. Several federal civil rights laws, such as Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, require recipients of federal financial assistance to give assurances that they will comply with those laws. Taken together, these civil rights laws prohibit recipients of federal financial assistance from DOJ from discriminating in services and employment because of race, color, national origin, religion, disability, sex, and, for grants authorized under the Violence Against Women Act, sexual orientation and gender identity. Recipients are also prohibited from discriminating in services because of age. For a complete review of these civil rights laws and nondiscrimination requirements, in connection with DOJ awards, see <https://ojp.gov/funding/Explore/LegalOverview/CivilRightsRequirements.htm>.

Under the delegation of authority, the OCR investigates allegations of discrimination against recipients from individuals, entities, or groups. In addition, the OCR conducts limited compliance reviews and audits based on regulatory criteria.

These reviews and audits permit the OCR to evaluate whether recipients of financial assistance from the Department are providing services in a nondiscriminatory manner to their service population or have employment practices that meet equal-opportunity standards.

If you are a recipient of grant awards under the Omnibus Crime Control and Safe Streets Act or the Juvenile Justice and Delinquency Prevention Act and your agency is part of a criminal justice system, there are two additional obligations that may apply in connection with the awards: (1) complying with the regulation relating to Equal Employment Opportunity Programs (EEOs); and (2) submitting findings of discrimination to OCR. For additional information regarding the EEO requirement, see 28 CFR Part 42, subpart E, and for additional information regarding requirements when there is an adverse finding, see 28 C.F.R. §§ 42.204(c), .205(c)(5).

The OCR is available to help you and your organization meet the civil rights requirements that are associated with DOJ grant funding. If you would like the OCR to assist you in fulfilling your organization's civil rights or nondiscrimination responsibilities as a recipient of federal financial assistance, please do not hesitate to contact the OCR at askOCR@ojp.usdoj.gov.

Memorandum Regarding NEPA

NEPA Letter Type

OJP - Categorical Exclusion

NEPA Letter

None of the following activities will be conducted whether under the Office of Justice Programs federal action or a related third party action:

- (1) New construction
- (2) Any renovation or remodeling of a property located in an environmentally or historically sensitive area, including property (a) listed on or eligible for listing on the National Register of Historic Places, or (b) located within a 100-year flood plain, a wetland, or habitat for an endangered species
- (3) A renovation that will change the basic prior use of a facility or significantly change its size
- (4) Research and technology whose anticipated and future application could be expected to have an effect on the environment
- (5) Implementation of a program involving the use of chemicals (including the identification, seizure, or closure of clandestine methamphetamine laboratories)

Additionally, the proposed action is neither a phase nor a segment of a project that when reviewed in its entirety would not meet the criteria for a categorical exclusion.

Consequently, the subject federal action meets the Office of Justice Programs' criteria for a categorical exclusion as contained in paragraph 4(b) of Appendix D to Part 61 of Title 28 of the Code of Federal Regulations.

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

NEPA Coordinator

First Name

Orbin

Middle Name

Last Name

Terry

Award Information

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

Recipient Information

Recipient Name

NASHVILLE & DAVIDSON COUNTY, METROPOLITAN GOVERNMENT OF

UEI

LGZLHP6ZHM55

Street 1

1 PUBLIC SQ

Street 2

City

NASHVILLE

State/U.S. Territory

Tennessee

Zip/Postal Code

37201

Country

United States

County/Parish

Province

Award Details

Federal Award Date

9/27/23

Award Type

Initial

Award Number

15PBJA-23-GG-04284-DGCT

Supplement Number

00

Federal Award Amount

\$930,095.00

Funding Instrument Type

Grant

Assistance Listing Number

16.585

Assistance Listings Program Title

Treatment Court Discretionary Grant Program

Statutory Authority

Pub. L. No. 90-351, Title I, Part EE (codified at 34 U.S.C. 10611 - 10619); Department of Justice Appropriations Act, 2023 (Pub. L. No. 117-328; 136 Stat. 4459, 4537)

[]

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

Project Information

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

Solicitation Title

2023 BJA FY 2023 Adult Treatment Court Site-Based

Awarding Agency

OJP

Application Number

GRANT13856963

Program Office

BJA

Grant Manager Name

Nicholas Leftwich

Phone Number

[202-880-7464](tel:202-880-7464)

E-mail Address

Nicholas.Leftwich@usdoj.gov

Project Title

Cherished HEARTS Treatment Expansion Project

Performance Period Start

Date

10/01/2023

Performance Period End Date

09/30/2027

Budget Period Start Date

10/01/2023

Budget Period End Date

09/30/2027

Project Description

Metropolitan Government of Nashville and Davidson County (Tennessee) is requesting \$930,095 for its Cherished HEARTS (Healing Enslaved and Repressed Trafficking Survivors) Court Expansion and Enhancement Project. Cherished HEARTS is the General Sessions Human Trafficking Survivors Court serving justice-involved victims of human trafficking and those at risk of sexual exploitation in the Nashville/Davidson County area. Created in 2016, Cherished HEARTS is one of the first sex trafficking intervention courts implemented in the United States. It is the court's policy to conduct all aspects of its program without discrimination of any kind. The purpose of this project is threefold: (1) Create a stand-alone human trafficking court to strengthen current court operations and internal capacity, centralize accountability, implement an independent approach for dealing with justice-involved trafficking victims, and develop a more efficient and effective treatment delivery system by adding a staff LCSW. (2) Better connect with victims through a peer recovery specialist. (3) Raise community awareness about human trafficking and sexual exploitation through expanded education and outreach efforts. The Cherished HEARTS Court is specifically designed to reduce revictimization of justice-involved survivors of human trafficking and those at risk of sexual exploitation. The court accepts pre- and postconviction cases, as well as pre-adjudication cases where the court's program acts as a condition of bond. Program participants are nonviolent, justice-involved individuals with high criminogenic risk and high behavioral health treatment needs suffering from extreme trauma and/or living with substance use disorders or co-occurring mental health issues. Cherished HEARTS is a voluntary treatment-based program that integrates treatment services and judicial supervision for participants with the goal of breaking the cycle of substance use disorders and criminal behavior. Cherished HEARTS uses a five-phase intervention program that lasts up to 24 months: Acute Stabilization, Clinical Stabilization, Pro-social Habilitation, Adoptive Habilitation, and Continuing Care. This project will incrementally serve 35 individuals. Because of the complexities in identifying victims of human trafficking and sexual exploitation, the number of eligible participants is inherently limited. Treatment will be provided using evidence-based practices including medication-assisted treatment, and recovery support services will be provided. The court operates in accordance with each of the National Association of Drug Court Adult Drug Court Best Practice Standards.

[]

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

Financial Information

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

The recipient budget is currently under review.

[]

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

Award Conditions

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

1

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

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

2

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

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

3

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

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

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

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

4

Applicability of Part 200 Uniform Requirements

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 C.F.R. Part 200, as adopted and supplemented by DOJ in 2 C.F.R. Part 2800 (together, the "Part 200 Uniform Requirements") apply to this FY 2022 award from OJP.

The Part 200 Uniform Requirements were first adopted by DOJ on December 26, 2014. If this FY 2022 award supplements funds previously awarded by OJP under the same award number (e.g., funds awarded during or before December 2014), the Part 200 Uniform Requirements apply with respect to all funds under that award number (regardless of the award date, and regardless of whether derived from the initial award or a supplemental award) that are obligated on or after the acceptance date of this FY 2022 award.

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

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

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

5

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

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

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

6

Requirement for data on performance and effectiveness under the award

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

7

Compliance with DOJ Grants Financial Guide

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

8

Compliance with general appropriations-law restrictions on the use of federal funds (FY 2022)

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable restrictions on the use of federal funds set out in federal appropriations statutes. Pertinent restrictions, including from various "general provisions" in the Consolidated Appropriations Act, 2022, are set out at <https://www.ojp.gov/funding/Explore/>

FY22AppropriationsRestrictions.htm, and are incorporated by reference here.

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

9

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

The recipient, and any subrecipient ("subgrantee") at any tier, must comply with all applicable requirements of 28 C.F.R. Part 38 (as may be applicable from time to time), specifically including any applicable requirements regarding written notice to program beneficiaries and prospective program beneficiaries.

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

The text of 28 C.F.R. Part 38 is available via the Electronic Code of Federal Regulations (currently accessible at <https://www.ecfr.gov/cgi-bin/ECFR?page=browse>), by browsing to Title 28-Judicial Administration, Chapter 1, Part 38, under e-CFR "current" data.

10

Effect of failure to address audit issues

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

11

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

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

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

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

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

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

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

12

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

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

13

Requirements related to "de minimis" indirect cost rate

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

14

Employment eligibility verification for hiring under the award

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

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

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

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

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

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

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

2. Monitoring

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

3. Allowable costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for

the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition.

4. Rules of construction

A. Staff involved in the hiring process

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

B. Employment eligibility confirmation with E-Verify

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

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

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

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

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

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

15

OJP Training Guiding Principles

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

16

Determination of suitability to interact with participating minors

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

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

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

17

Potential imposition of additional requirements

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

18

Required training for Grant Award Administrator and Financial Manager

The Grant Award Administrator and all Financial Managers for this award must have successfully completed an "OJP financial management and grant administration training" by 120 days after the date of the recipient's acceptance of the award. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

In the event that either the Grant Award Administrator or a Financial Manager for this award changes during the period of performance, the new Grant Award Administrator or Financial Manager must have successfully completed an "OJP financial management and grant administration training" by 120 calendar days after the date the Entity Administrator enters updated Grant Award Administrator or Financial Manager information in JustGrants. Successful completion of such a training on or after October 15, 2020, will satisfy this condition.

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

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

19

Restrictions and certifications regarding non-disclosure agreements and related matters

No recipient or subrecipient ("subgrantee") under this award, or entity that receives a procurement contract or subcontract with any funds under this award, may require any employee or contractor to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to an investigative or law enforcement representative of a federal department or agency authorized to receive such information.

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

1. In accepting this award, the recipient--

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

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

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

a. it represents that--

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

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

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

20

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

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

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

21

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

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

22

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

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

23

Encouragement of policies to ban text messaging while driving

Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages recipients and subrecipients ("subgrantees") to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this

award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

24

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

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

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

25

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

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

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

26

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

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

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

27

Requirement to report potentially duplicative funding

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

28

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

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

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

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

29

Requirements related to System for Award Management and Universal Identifier Requirements

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

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

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

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

30

Restrictions on "lobbying"

In general, as a matter of federal law, federal funds awarded by OJP may not be used by the recipient, or any subrecipient ("subgrantee") at any tier, either directly or indirectly, to support or oppose the enactment, repeal, modification, or adoption of any law, regulation, or policy, at any level of government. See 18 U.S.C. 1913. (There may be exceptions if an applicable federal statute specifically authorizes certain activities that otherwise would be barred by law.)

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

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

31

The recipient understands that, in accepting this award, the Authorized Representative declares and certifies, among other things, that he or she possesses the requisite legal authority to accept the award on behalf of the recipient entity

and, in so doing, accepts (or adopts) all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority.

32

Regarding medication-assisted treatment (MAT), the award recipient understands and agrees to the following: 1) all clients in a BJA-funded drug court have a right to access MAT under the care and prescription of a physician to the extent MAT is clinically indicated; 2) BJA-funded drug courts must not deny any eligible client enrollment to the drug court program because of their use of FDA-approved medications for the treatment of substance abuse; 3) MAT must be permitted to be continued for as long as the prescriber determines that the FDA-approved medication is clinically beneficial; 4) while under no circumstances can a BJA-funded drug court program deny access to MAT under the care and prescription of a physician when it is clinically indicated, a judge retains judicial discretion to mitigate/reduce the risk of abuse, misuse, or diversion of these medications; and 5) federal funds shall not be used to support activities that violate the Controlled Substances Act, 21 U.S.C. 801-904.

33

Verification and updating of recipient contact information

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

34

All BJA-funded adult drug courts must be operated based on the 10 key components for drug courts, which are found in BJA's and National Association of Drug Court Professionals (NADCP) publication: Defining Drug Courts: The Key Components at <https://www.ncjrs.gov/pdffiles1/bja/205621.pdf>. During the grant period of performance, if BJA concludes that a funded drug court is not conforming to the 10 key components, it retains the right to place the award recipient on a corrective action plan to bring the drug court into conformance. Continued failure to maintain conformance to the key components may result in a hold placed on award funds or suspension/termination of the grant award agreement.

35

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

36

Recipient understands and agrees that it must submit quarterly Federal Financial Reports (SF-425) and semi-annual performance reports through JustGrants (justgrants.usdoj.gov), and that it must submit quarterly performance metrics reports through BJA's Performance Measurement Tool (PMT) website (<https://bjapmt.ojp.gov/>). For more detailed information on reporting and other requirements, refer to BJA's website. Failure to submit required reports by established deadlines may result in the freezing of grant funds and High Risk designation.

37

Any written, visual, or audio publications funded in whole or in part under this award, with the exception of press releases, shall contain the following statements: "This project was supported by Grant No. <AWARD_NUMBER>

awarded by the Bureau of Justice Assistance. The Bureau of Justice Assistance is a component of the Department of Justice's Office of Justice Programs, which also includes the Bureau of Justice Statistics, the National Institute of Justice, the Office of Juvenile Justice and Delinquency Prevention, the Office for Victims of Crime, and the SMART Office. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice." The current edition of the DOJ Grants Financial Guide provides guidance on allowable printing and publication activities.

38

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

39

The recipient understands and agrees that no award or matching funds may be used to provide services for violent offenders as defined in 42 U.S.C. 3797u-2, a "violent offender" means a person who (1) is charged with or convicted of an offense that is punishable by a term of imprisonment exceeding one year, during the course of which offense or conduct (A) the person carried, possessed, or used a firearm or dangerous weapon; (B) there occurred the death of or serious bodily injury to any person; or (C) there occurred the use of force against the person of another, without regard to whether any of the circumstances described in subparagraph (A) or (B) is an element of the offense or conduct of which or for which the person is charged or convicted; or (2) has 1 or more prior convictions for a felony crime of violence involving the use or attempted use of force against a person with the intent to cause death or serious bodily harm.

40

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

41

Recipient may not obligate, expend, or drawdown funds until the Bureau of Justice Assistance, Office of Justice Programs has reviewed and approved the Budget Narrative portion of the application and has issued an Award Condition Modification (ACM) informing the recipient of the approval.

42

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

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

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

OJP will issue an Award Condition Modification upon budget clearance.

43

Justification of consultant rate

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

44

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

45

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

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

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

46

FFATA reporting: Subawards and executive compensation

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

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

47

Applicants must ensure that Limited English Proficiency persons have meaningful access to the services under this program(s). National origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI and the Safe Streets Act, recipients are required to take reasonable steps to ensure that LEP persons have meaningful access to their programs. Meaningful access may entail providing language assistance services, including oral and written translation when necessary. The U.S. Department of Justice has issued guidance for grantees to help them comply with Title VI requirements. The guidance document can be accessed on the Internet at www.lep.gov.

48

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

With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of

the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)

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

49

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

50

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

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

Award Acceptance

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

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

- A. Declare to the U.S. Department of Justice (DOJ), under penalty of perjury, that I have authority to make this declaration and certification on behalf of the applicant.
- B. Certify to DOJ, under penalty of perjury, on behalf of myself and the applicant, to the best of my knowledge and belief, that the following are true as of the date of this award acceptance: (1) I have conducted or there was conducted (including by applicant's legal counsel as appropriate and made available to me) a diligent review of all terms and conditions of, and all supporting materials submitted in connection with, this award, including any assurances and certifications (including anything submitted in connection therewith by a person on behalf of the applicant before, after, or at the time of the application submission and any materials that accompany this acceptance and certification); and (2) I have the legal authority to accept this award on behalf of the applicant.
- C. Accept this award on behalf of the applicant.
- D. Declare the following to DOJ, under penalty of perjury, on behalf of myself and the applicant: (1) I understand that, in taking (or not taking) any action pursuant to this declaration and certification, DOJ will rely upon this declaration and certification as a material representation; and (2) I understand that any materially false, fictitious, or fraudulent information or statement in this declaration and certification (or concealment or omission of a material fact as to either) may be the subject of criminal prosecution (including under 18 U.S.C. §§ 1001 and/or 1621, and/or 34 U.S.C. §§ 10271-10273), and also may subject me and the applicant to civil penalties and administrative remedies under the federal False Claims Act (including under 31 U.S.C. §§ 3729-3730 and/or §§ 3801-3812) or otherwise.

Agency Approval

Title of Approving Official
Assistant Attorney General

Name of Approving Official
Amy Solomon

Signed Date And Time
9/25/23 4:27 PM

Authorized Representative

Entity Acceptance

Title of Authorized Entity Official

Signed Date And Time

Budget Summary

Budget Summary											
<i>Note: Any errors detected on this page should be fixed on the corresponding Budget Detail tab.</i>											
Budget Category	Year 1		Year 2 (if needed)		Year 3 (if needed)		Year 4 (if needed)		Year 5 (if needed)		Total(s)
	Federal Request	Non-Federal Request	Federal Request	Non-Federal Request	Federal Request	Non-Federal Request	Federal Request	Non-Federal Request	Federal Request	Non-Federal Request	
A. Personnel	\$125,250	\$89,296	\$125,250	\$89,296	\$125,250	\$89,296	\$125,250	\$18,512	\$0	\$0	\$787,400
B. Fringe Benefits	\$54,633	\$27,001	\$54,633	\$0	\$54,633	\$0	\$54,633	\$0	\$0	\$0	\$245,533
C. Travel	\$9,931	\$0	\$9,931	\$0	\$9,931	\$0	\$9,931	\$0	\$0	\$0	\$39,724
D. Equipment	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
E. Supplies	\$27,039	\$0	\$26,900	\$0	\$26,710	\$0	\$26,710	\$0	\$0	\$0	\$107,359
F. Construction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
G. Subawards (Subgrants)	\$20,286	\$0	\$14,398	\$0	\$14,398	\$0	\$14,398	\$0	\$0	\$0	\$63,480
H. Procurement Contracts	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
I. Other	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Direct Costs	\$237,139	\$116,297	\$231,112	\$89,296	\$230,922	\$89,296	\$230,922	\$18,512	\$0	\$0	\$1,243,496
J. Indirect Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Project Costs	\$237,139	\$116,297	\$231,112	\$89,296	\$230,922	\$89,296	\$230,922	\$18,512	\$0	\$0	\$1,243,496
Does this budget contain conference costs which is defined broadly to include meetings, retreats, seminars, symposia, and training activities? - Y/N										No	

**SIGNATURE PAGE
FOR
GRANT NO. 15PBJA-23-GG-04284-DGCT**

IN WITNESS WHEREOF, the parties have by their duly authorized representatives set their signatures.

**METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY**




General Sessions Court

10-5-23

Date

**APPROVED AS TO AVAILABILITY
OF FUNDS:**



Director of Finance
Department of Finance

10/24/2023 | 1:45 PM CDT

Date

APPROVED AS TO RISK AND INSURANCE:



Director of Insurance

10/25/2023 | 10:55 AM CDT

Date

**APPROVED AS TO FORM AND
LEGALITY:**



Metropolitan Attorney

10/25/2023 | 9:25 AM CDT

Date

FILED:

Metropolitan Clerk

Date

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

Introduction

Cherished HEARTS (Healing Enslaved and Repressed Trafficking Survivors) is the General Sessions Human Trafficking Survivors Court created in 2016 to serve the Metropolitan Nashville/Davidson County, Tennessee area. Cherished HEARTS is one of the first sex trafficking intervention courts implemented in the United States, and is specifically designed to reduce revictimization of justice-involved survivors of human traffickingⁱ and individuals at risk of being exploited.ⁱⁱ Metropolitan Government of Nashville and Davidson County is the applicant agency for this application and will serve as the grant's fiscal agent. It is the policy of Cherished HEARTS to conduct all aspects of its program without discrimination.

A. Description of the Issue

Human trafficking – and its devastating and debilitating effects, mainly on girls and women – knows no border and the issue has permeated Nashville/Davidson County. Forced sex trafficking crimes are often hidden crimes that can easily evade detection, are frequently underreported, and are constantly evolving.

The estimated population of Davidson County is 708,144, which is 10% of the state's population of 7,051,339.ⁱⁱⁱ The county, however, has experienced issues related to human trafficking and sexual exploitation at much higher rates relative to the proportion of its population. For the eight-year period of 2014-2021, Davidson County accounted for 148 (29.3%) of the 505 crimes against individuals in Tennessee most associated with human trafficking and sexual exploitation: *commercial sex acts and involuntary servitude*, which are both felonies.^{iv} When accounting for crimes against society that are also likely to involve human trafficking or sexual exploitation – *prostitution, prostitution assisting/promoting, and purchasing prostitution* – Davidson County

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

accounted for 2,450 (34.3%) of 7,139 such crimes committed in Tennessee for 2014-2021.^v In 2022, the Human Trafficking Prosecution Unit within the Davidson County District Attorney's Office prosecuted 50 crimes related to human trafficking: trafficking for a commercial sex act (22), patronizing prostitution (12), prostitution (8), promoting prostitution (6), aggravated prostitution (1), and prostitution near a school zone (1).^{vi}

Most Cherished HEARTS participants, however, enter the program because of drug-related arrests, and drug issues in Davidson County are extremely prevalent compared to the rest of Tennessee. Between 2017 and 2021, the overdose death rate for all drugs per 100,000 residents in Davidson County was 72, while the state rate was 57.^{vii} The overdose death rate for opioids was 62 in Davidson County and 46 statewide.^{viii} For drug overdoses between 2016-2020, the rate of inpatient stays per 100,000 residents was higher in Davidson County (156) than the statewide rate (100).^{ix}

Current operation. Cherished HEARTS accepts pre- and post-conviction cases from both the General Sessions Court and Criminal Court. Cherished HEARTS also accepts pre-adjudication cases where the Court's program acts as a condition of bond for legal purposes. Pre-adjudication cases are capable of dismissal and expungement for the participant upon their graduation from the Court program. Individuals with post-conviction cases are given a chance to avoid a sentence of incarceration, shorten their term of probation, or consolidate multiple probation sentences, which can then be terminated upon successful program completion. In some instances, individuals may need to remain on probation to fulfill the remainder of their sentence following Court graduation.

Although no state certification or requirements exist in Tennessee for human trafficking courts, Cherished HEARTS follows the National Association of Drug Court Professionals (NADCP) ten

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

key components defining drug Courts^x and implements the NADCP adult drug court best practice standards (BPS).^{xi}

Cherished HEARTS is a voluntary, treatment-based program that integrates treatment services and close judicial supervision for participants with the goal of breaking the cycle of substance use disorders and criminal behavior (**Key Component #1**). The Court serves high-risk/high-needs, justice-involved individuals either suffering from extreme trauma and/or living with substance use disorders or co-occurring mental health issues. (**BPS #6**). The program's strategic approach combines clinical treatment and recovery support services through community partnerships while monitoring participants' compliance with program requirements (**Key Component #6**). A multi-disciplinary team works together to balance participants' needs and rights with maintaining public safety and personal accountability (**Key Component #2; BPS #8**).

Referral, screening, and assessment (Key Component #3). Referrals to the Cherished HEARTS program are made through various sources, including judges, district attorneys, probation officers, defense attorneys, or by self-referral. Referred defendants are screened either by the Program Manager or the program's Substance Use Treatment Specialist. Using the Ohio Risk Assessment System (ORAS) screening tool,^{xii} a review is done of the potential participant's current offense(s), criminal history, and history of substance use involvement. Assessments of the individual's trafficking history and treatment needs are also done. Program requirements and expectations are explained and discussed with the defendant, who then decides whether or not to commit to the program.

During the initial process, the district attorney's office ensures no violent offender is considered for the program. The Court team also creates a treatment plan for each participant. Upon

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

successful completion of the program, participants' cases are docketed for judicial review of their original Court-ordered supervision.

Eligibility requirements (BPS #2). The program is voluntary and designed to minimize barriers to participation, with specific eligibility requirements in place. Candidates must be: 1) identified as a human trafficking victim using the validated Trafficking Victim Identification Tool;^{xiii} 2) committed to following the recommendations of the Cherished HEARTS Court team; and 3) non-violent offenders. Incarcerated candidates must have all charges and holds in other counties or jurisdictions cleared prior to being accepted into the program. Conversely, violent offenders, registered sex offenders, and confirmed gang members are not eligible.

Target population (BPS #1). The program's target population is justice-involved adults of Davidson County who are considered victims of human trafficking or at risk of sexual exploitation. The program does not discriminate against any eligible prospective or current candidate. **(BPS #2).**

Current capacity (BPS #9). In order to balance its operational capacity with maintaining fidelity to best practice standards, Cherished HEARTS currently serves 7 clients. Direct program staff includes one treatment specialist, while the program manager/probation officer, grants coordinator, and case manager positions are supported through other Metro-Nashville government offices/resources.

Length and phases of the program. Cherished HEARTS is a 5-phase intervention program that lasts up to 24 months. The individual components are: Phase 1/Acute Stabilization (min. 90 days); Phase 2/Clinical Stabilization (min. 90 days); Phase 3/Pro-social Habilitation (min. 90 days); Phase 4/Adoptive Habilitation (min. 90 days); and Phase 5/Continuing Care (min. 30 days).

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

At any point during the program, clients' participation may be terminated for specific reasons, including the participant is rearrested and/or convicted of a misdemeanor or felony offense, refuses to comply with case management or treatment plans, or poses a threat to public safety.

Case management process. The program's case management function is a holistic, multi-disciplinary, strengths-based approach coordinated by a case manager. Case management services are varied, and participants are involved in the case management process throughout their time in the program.

Community supervision. Supervision of program participants is provided by Cherished HEARTS and the Davidson County Probation Department. Participants are required to attend office visits with their probation officer according to their respective Phase. These visits review the individual's case plan, update contact information, confirm paycheck and place of employment, guide participants in their personal goals and phase requirements, review participant manual for completion, and review sanction requirements as needed. Travel plans are submitted to probation staff on Mondays for a Tuesday review starting in Phase 3. Move-out plans are submitted in Phase 4 before independent living is approved. The program's treatment specialist and case manager also provide a level of community supervision for clients.

Recovery support services delivery plan, including vocational and/or educational, transitional housing, and peer recovery services (Key Component #10). The program maintains a relationship with community resources to ensure effective recovery supports. The program respects each participant's right to self-determination when recommending community resources, and each participant develops a case plan with individualized recovery goals pertaining to job/skills training, housing, employment, harm reduction techniques, and education.

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

Family support services. Many trafficked victims are not connected with their families. Various treatment modalities, however, may involve family members if such members are agreeable.

Strategies to prevent and respond to risk for overdose. The Court's underlying premise is to assist justice-involved victims of human trafficking and those at risk for sexual exploitation to successfully manage their issues in order to live healthy, productive lives. Individualized substance-use treatment services for participants are provided based their respective assessments. The program consists of 5 distinct phases requiring clients' participation in treatment (including any clinically-recommended medication-assisted treatment), case management services, and other requirements to help prevent and/or respond to risk for overdose or other unhealthy behaviors.

Judicial supervision (Key Component #7; BPS #3). Participants appear in Court on a regular basis according to their program Phase. The Judge and court team members meet prior to Court sessions to discuss each client on the docket, including their progress and any setbacks. This information is used during participants' Court sessions to help determine appropriate incentives or sanctions, to provide encouragement and support in a structured and formal setting, and for overall planning purposes. Because some participants enter a guilty plea before entering the program, they are placed on supervised probation. Failure to complete the program results in a violation of probation.

Process for randomized drug testing (Key Component #5; BPS #7). Participants' abstinence from substances is determined through random urinalysis testing. Drug screens are scheduled on a computerized random system through the testing provider. Participants call or log onto the automated drug screen hotline every day (as early at 5a.m.) and enter their PIN. If they are required to test, they must arrive between 7a.m.-5p.m. that day to provide a urine sample. Oral fluid tests

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

can be administered on a case-by-case basis. All urine screens are directly observed by a member of the same sex, and chain of custody paperwork is completed per the testing provider's donor testing agreement and policies. Results are provided to the Court within 48 hours.

Incentives and sanctions (BPS #4). Cherished HEARTS uses incentives and sanctions to help participants live law-abiding, substance free lives. The team looks for reasons to encourage and incentivize participants to accomplish their program and personal goals. Conversely, sanctions are used to help participants modify negative behavior and are intended to keep participants from returning to jail. The Judge imposes all incentives and sanctions from the bench.

Graduation. Cherished HEARTS participants must fulfill all specified requirements to successfully complete the program, including: complete all conditions as listed on the Cherished HEARTS program conditions, complete all assessed aspects of drug and alcohol treatment, complete all assessed aspects of mental health treatment, maintain sobriety for 90 days, maintain financial independence for 90 days, and have a formulated plan for maintaining independence.

Restitution and fees. No program-related fees are required, although participants may be required to provide restitution as part of their sentence. If applicable, and if resources are available, program participants contribute toward housing costs beginning in Phase 3.

Training (Key Component #9). Various Cherished HEARTS team members have attended annual conferences sponsored by NADCP and the Tennessee Association of Recovery Court Professionals, along with Ending the Game training to understand the psychological coercion associated with human trafficking. The team monitors any emerging best practices for treatment courts and any state-level changes/initiatives regarding such courts.

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

Planning. All planning functions are conducted by the Court team. Through this proposal, the Court is also seeking a licensed clinical social worker (LCSW) position and certified peer recovery specialist (CPRS) position. From a planning perspective, the LCSW will enable the program to refocus and centralize its treatment services to better serve clients, and the peer specialist will allow the program to more fully connect with current and prospective clients and provide much-needed community education and outreach efforts.

Treatment services/evidence-based practices (Key Component #4; EBP #5). Clinical treatment for program participants follows a continuum based on need. Under this grant, a central treatment provider will be used to ensure program participants receive the appropriate type and level of care in a timely manner to meet their needs. Treatment services are based on clinical assessments, and include an array of evidence-based practices. Medication-Assisted Treatment (MAT) is also an important program component, and access to all forms of MAT is provided based on clinical assessment and need. Community-based treatment, including 12-Step support groups, is also used. Concurrent with treatment services, the program offers various recovery support services to clients. The program manager, treatment specialist, and case manager have oversight responsibilities, and are in frequent contact with current providers and community resources.

B. Project Design and Implementation

Project purpose and goals. The overarching purpose of the Cherished HEARTS proposed project is to expand much-needed treatment Court services to justice-involved victims of human trafficking or sexual exploitation in Davidson County to help eliminate criminal and drug-addiction behaviors. The Court is proposing this multi-faceted expansion and enhancement project to **serve 35 trafficked victims over the four-year grant period.** Because of the complexities in

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

identifying victims of human trafficking and sexual exploitation and the narrow specialty of the Court, the number of eligible participants is inherently limited. To that end, Cherished HEARTS has the following goals: *Goal 1*) create a stand-alone human trafficking Court to strengthen Court operations and internal capacity, centralize accountability, implement an independent approach for dealing with justice-involved trafficking victims, and develop a more efficient and effective treatment delivery system; *Goal 2*) better connect with victims through a peer recovery specialist; and *Goal 3*) raise community awareness about human trafficking and sexual exploitation through expanded education, outreach efforts, and (possible) state certification. Cherished HEARTS, however, cannot accomplish these goals without federal support.

The Court has a bifurcated organizational structure in that a Probation Officer from the Metro-Nashville Probation Department serves a dual-role as the Court's Program Manager and as the Probation Officer for all program participants, which is conflicting based on the roles of those two positions. Both functions report to the Office of Probation, and not to the Court's presiding Judge. This structure has led to: 1) confusion and miscommunication with program participants; 2) a philosophical difference whether the response for participants who have minor rules violations should be punitive – as is case with the current probation-focused response – or a more trauma-informed, therapeutic adjustment approach, as favored by the Court team; and 3) inconsistent accountability due to multi-office management and oversight. Funding through this grant proposal would allow for the current Grants Coordinator to assume the role of program manager, thus revising the organizational structure and resolving the inherent conflict. Simultaneously, the Court's current therapy contractor recently changed a key program component for dealing with trafficked individuals that is highly inconsistent with the Court's preferred approach. The Court believes an LCSW therapist on staff to provide treatment services would fully align with the

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

Court's philosophy, be more conducive for helping program participants, and provide more continuity in therapy providers. Lastly, the Court's use of a CPRS with lived experience as its primary community liaison for education and outreach would serve to better connect and relate with prospective and current clients. The CPRS would also help develop a community outreach curriculum to train and educate primary responders, industry professionals, and community members to recognize the signs of human trafficking/sexual exploitation and how to safely and appropriately respond to those cases. The Court's current Phase structure and program requirements will remain the same under the grant.

Best Practice Standards. The proposed project is designed to fully align with the NADCP 10 best practice standards for adult drug Courts, as well as the NADCP 10 key components defining adult drug Courts. The project will implement the NADCP best practices as follows:

Standard 1 Target Population: Cherished HEARTS provides an array of services for individuals who are high risk/high need, nonviolent offenders. The Court's current requirements provide objective program eligibility and review criteria. The current evidence-based criminogenic and treatment assessments would continue, with results discussed among team members.

Standard 2 Equity and Inclusion: Under the grant, Cherished HEARTS's current practice of prohibiting discrimination or reduced opportunities within its program for any reason will be maintained. Equity and inclusion efforts will be overseen by the Court team and an external Evaluator, with direct oversight by the presiding Judge.

Standard 3 Roles and responsibilities of the Judge: The current Judge has presided over Cherished HEARTS since September 2019. The Judge holds Court every Tuesday, attends staffing prior to Court, and issues incentive, sanctions, and therapeutic adjustments with advice from all

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

team members. The Judge also attends relevant trainings to remain current on client treatment matters, human trafficking, substance use disorders and mental health treatment, as well as behavior modifications and community supervision. The Judge has control over the program, and is dedicated to following NADCP standards and maintaining appropriate judicial demeanor.

Standard 4 Incentives, Sanctions and Therapeutic Adjustments: Cherished HEARTS is a highly individualized program intended to provide participants the resources needed to become independent, healthy, productive members of society. Individuals in this Court have experienced complex trauma. When participants display healthy coping skills, program compliance, or healthy support for another participant, the Judge may issue an incentive(s). When anti-social behaviors or attitudes occur, the team discusses the behavior and through consensus makes recommendations to the Judge who issues the sanction(s). The Court does not sanction relapses, but instead uses therapeutic adjustments. Prospective program candidates are provided a Participant Handbook upon entering the program, which details the use of incentives and sanctions.

Standard 5 Substance Use Disorder Treatment: Evidence-based resources and standardized tools are used for screening, assessment, and treatment. A continuum of care for participants' substance use disorders or co-occurring mental health issues includes immediate stabilization and detoxification, inpatient residential treatment, and intensive outpatient treatment, and is overseen by a full-time staff substance use specialist. Treatment services are provided by licensed and experienced providers using evidence-based modalities, including MAT.

Standard 6 Complementary Treatment and Social Services: The Court focuses on participants' individual needs that are conducive to recovery and that avoid re-arrest and incarceration. Individualized substance-use treatment services for participants are provided based their respective

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

assessments. A generalist case management model and community partners are used to target other services beneficial to participants' accessibility to treatment and their overall recovery.

Standard 7 Drug and Alcohol Testing: The Court's policy is that participants' abstinence from substances is determined through random, unannounced, and frequent urinalysis testing. A written protocol is in place to ensure the integrity of the urine sample collection and testing processes. Testing is done during each program phase, and at least twice per week.

Standard 8 Multidisciplinary Team: The Court team is a multi-disciplinary and collaborative group with representatives from different aspects associated with the program. This includes the Judge, prosecutor, defense attorney, treatment providers, probation officer, case manager, and law enforcement, among others. Informed and shared decision making regarding each client is standard practice. The team also stays knowledgeable of drug court initiatives and best practices.

Standard 9 Census and Caseloads: While the Court's operational capacity largely drives the total number of program participants it can serve, census is not arbitrarily applied but guided by quality treatment, supervision, clinical intervention, and support. Clinical caseloads are designed to support maximum therapeutic outcomes and ensure resources are available for treatment. The case management function also follows a manageable caseload to maximize the number of clients without sacrificing service quality.

Standard 10 Monitoring and Evaluation: The Court team monitors program performance and adherence to best practice standards. An external Evaluator will be hired to assist with this process.

Medication-Assisted Treatment. Cherished HEARTS believes Medication-Assisted Treatment is part of a whole-client approach for substance use and mental health issues. The Court accepts participants who voluntarily elect MAT as part of their treatment protocol. Participants must

Metropolitan Government of Nashville and Davidson County
 Cherished HEARTS Court Expansion and Enhancement Project
 BJA Grant: O-BJA-2023-171509

undergo an assessment and are under the direct supervision of an appropriate credentialed and licensed medical professional while in an MAT regimen.

Treatment and services plan. This project is designed to provide treatment assessment and services to program participants through experienced substance use disorder and mental health providers. Having an LCSW on staff will centralize treatment services making it a more efficient and effective process for program participants. As part of this project, the LCSW will determine participants’ therapeutic needs. Community-based recovery support resources will also be available, including Alcoholics Anonymous and Narcotics Anonymous. The Court and the new treatment provider, when hired, will ensure there is adequate capacity to provide treatment services to the number of individuals served annually under this grant.

The tools used for clinical assessments are: DAST-10, Addiction Severity Index (ASI), Substance Use Scale, and Adverse Childhood Experiences (ACEs). Examples of the specific evidence-based modalities currently used for program treatment are:

• Moral Reconciliation Therapy (MRT®)	• Sensorimotor Psychotherapy
• Cognitive Behavioral Therapy (CBT)	• Trauma-focused CBT
• Trust-based Relational Intervention	• Internal Family Systems
• Intensive Outpatient Treatment (IOP)	• Somatic Experiencing
• Attachment, Self-Regulation, Competency (ARC)	• Residential Inpatient Treatment
• Comprehensive Resource Model (CRM)	• Eye Movement Desensitization and Reprocessing (EMDR)

The evidence base for the above-referenced assessment tools and treatment modalities for substance use disorder and co-occurring mental health issues is strong for this population. These methods are used by numerous Recovery Courts as effective evidence-based practices.

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

The Program Director and Treatment Specialist will have primary daily oversight of the services provided to program participants and participants' progress.

Referral, screening, and assessment. Cherished HEARTS's current referral, screening, and assessment processes will remain under the proposed project. Individuals may be referred to the Court by a Judge, district attorney, public defender, private attorney, or by self-referral. The district attorney's office also ensures no violent offender is considered for the program. Court clients may participate in the program only after all pending criminal charges have been resolved either by a plea or after conviction at trial. Initial clinical and criminogenic assessments are completed as part of determining eligibility. The ORAS tool is administered to potential participants to determine their level of risk and need (the program only admits candidates who are considered high risk/high need). Court staff then meet candidates to fully explain the program requirements and to complete the necessary forms. The program's rules and regulations must be agreed to for candidates to meet eligibility requirements. After successful completion of the program, participants' case(s) are docketed for judicial review of the status of the original Court-ordered supervision.

All referrals are processed in the order received, and no special consideration is given to referrals based on recommendations from team members or outside sources. The time from the date of enrollment into the Court program and the date of first initiation of clinical treatment services typically takes 30 days, depending on treatment recommendations. General services begin within 2-3 days after a participant enters the program.

Equivalent access. It is the policy and practice of Cherished HEARTS to provide the citizens of Nashville/Davidson County who have historically experienced sustained discrimination or reduced social opportunities because of their race, ethnicity, gender, sexual orientation, sexual

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

identity, physical or mental illness, religion, or socioeconomic status the same opportunities as other citizens to participate and succeed in Cherished HEARTS. To that end, the Court is open to assessing the use of the NADCP Equity and Inclusion Assessment Toolkit.

Program. Cherished HEARTS is 5-phase strategic intervention program. Each phase builds on the previous one, with the ultimate goal of providing participants the structure and techniques needed to sustain long-term recovery and breaking away from criminal activity. All five phases have specific requirements, including appearing before the Judge, and each phase consists of random, unannounced drug testing. The program is designed to last up to 24 months. Cherished HEARTS is an important link in the state's efforts to reduce recidivism and substance abuse among adult offenders and identify and end human trafficking and sexual exploitation in Tennessee.

Community reintegration or continued care strategy. The Court's Phased-program has specific components to help participants strengthen their pro-social behaviors, recovery networks, and healthy behavior patterns including positive coping skills. Participants' trauma-focused psychotherapeutic work helps them build the skills and techniques needed to successfully regain trust for community reintegration and continued recovery. In the final phase of the program, participants are expected to have gained and maintained financial independence, maintained independent housing, and continuously demonstrated abstinence from substance use.

Sustainability Plan: Cherished HEARTS currently operates with funding from a federal VOCA grant, which is expiring this June, and some funding from Metropolitan Nashville and Davidson County Government. The Human Trafficking Survivors Court Foundation is the fundraising arm of the Court, and has provided limited assistance to participants for recovery support (e.g., housing stipends, transportation). The Foundation will continue its efforts to support program participants.

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

Other local, state, and federal grant sources, including the Edward Byrne Memorial Justice Assistance Grant Program, could also be leveraged to help sustain the program, but those are not guaranteed funding sources.

C. Capabilities and Competencies

The following Court key team members will have a role in implementing the proposed enhancement and expansion project helping to ensure its success.

Ana Escobar, Judge: will oversee entire program, lead Court team, preside over all Cherished HEARTS Court proceedings, hear inputs from team members, use information provided (along with NADCP Best Practice) to make program decisions, impose appropriate incentives/sanctions, reviews participants' progress, ensure participants' compliance with program requirements, and be ultimate decision maker and arbiter. (J.D., George Washington University Law School; attorney/judge 28 years)

Grace Guerra Woolbright, Project Director: will directly oversee the grant, coordinate programming efforts, provide program strategic planning and development, coordinate with government and partner agencies, and provide daily program oversight. (J.D., Nashville School of Law; attorney/victim advocate 25 yrs.)

District Attorney, Emma Lawson: will assist Court team in deciding if a candidate should be accepted to the program, assist in decision-making as it relates to sanctions and incentives; and move cases forward if victims want to prosecute their trafficker. (J.D., Case Western Reserve University School of Law; Attorney 3 years)

Public Defender, Faith Mote: will consult with and advise participants regarding the benefits and responsibilities of participating in Cherished HEARTS, help participants make well-informed

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

decisions regarding program participation, also ensure Court team is observing participants' due process rights and program policies. (J.D., University of TN College of Law; Attorney 5 years)

Melanie Taylor, Probation Officer: will monitor and supervise all program participants to ensure program compliance, report noncompliance issues to the team, encourage participants to engage in pro-social activities and behaviors, prepare probation violation warrants. (B.S. Criminal Justice, TN State University; Probation Officer 35 years)

Alissa Bloom, Substance Use Treatment Specialist: will oversee participants' care plans, contribute knowledge and expertise during Court team deliberations, and assist team with recovery treatment decisions and individual sanctions and incentives recommendations. (BSW, Indiana University; Cherished HEARTS Treatment Specialist, 3 years)

Julianne Teague, Case Manager: will assist participants in identifying their needs and accessing resources to meet those needs (e.g., housing, food, clothing, personal items, advocacy), provide updates on each participant scheduled for Court, and act as a liaison between participants' community providers. (B.A. Criminal Justice, Bloomsburg University of Pennsylvania; Metro Nashville Office of Family Services|Case Manager, 6 months)

TBD, Licensed Clinical Social Worker: will complete initial mental/behavioral health evaluations resulting in realistic treatment plans, assess clients using standardized assessment/screening tools, provide individual therapy and group counseling, and provide psychoeducation/treatment related to substance use disorders, human trafficking, and sexual exploitation risks. (Required: LCSW)

TBD, Certified Peer Recovery Specialist: will provide direct peer-to-peer support services to others with substance use disorders, mental health issues, or co-occurring disorders; community outreach. (Required CPRS)

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

Allard Consulting, LLC, Evaluator: will provide a process evaluation and performance-monitoring services. Master's Degree-level evaluators who have conducted previous evaluations of Recovery Courts throughout Tennessee and in other states.

Proposed Treatment and Recovery Support Partners: Cherished HEARTS currently integrates Court supervision and a network of treatment services and community-based resources. The Court's treatment providers for therapy/counseling are Ancora, Thistle Farms, and Sexual Assault Center, and Mental Health Coop (mental health/MAT). Several community partners offer other services, including housing, employment, and other recovery support and pro-social activities.

Program Evaluation: Allard Consulting, LLC, the external Evaluator for this grant, has extensive experience as an evaluator for projects focused on individuals with substance use disorders and co-occurring mental health disorders, including programs where participants are also involved in the criminal justice system. As an independent external Evaluator, Allard Consulting can remain objective and assess (non-clinically) who benefits most and least from treatment, including those who will be impacted in the evaluation process and sampling populations of focus. Allard Consulting's work is equity-focused, culturally responsive, and committed to issues of diversity, equity, and inclusion, which are essential elements to developing process and outcome evaluations and work products that support programs' short- and long-term goals and objectives.

Communication and coordination. The Court team meets every Tuesday to discuss participants' compliance and treatment. With compliance issues, the team considers available alternatives. The group encourages input from all team members to ensure continuity of responses to maintain consistent expectations and remedies that the other participants can see and understand. This non-adversarial approach emphasizes a consistent focus on participants' recovery and outcomes. The

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

assigned treatment providers also maintain ongoing communication with the Court team about participants through weekly written progress reports.

D. Plan for Collecting the Data Required for this Solicitation's Performance Measures

Evaluation. The Court will contract with Allard Consulting, LLC, as the grant's external Evaluator. The evaluation process is intended to verify the extent to which the project is implemented and the impact on improving program and participant outcomes. The Evaluator will be responsible for all BJA's performance reporting requirements.

Progress Meetings: Allard Consulting will hold at least quarterly meetings with the Court team to ensure project progress and discuss relevant performance metrics.

Data Collection: The Court currently uses the Tennessee Web Information Technology System (TN-WITS), a certified Electronic Health Record platform for data collection. The Evaluator will review and examine TN-WITS reports for analysis and reporting purposes. The Project Director will work with the Evaluator, program staff, and partners to ensure proper data is collected to track all measurable goals and required performance metrics. The Evaluator will ensure pertinent information is collected to describe and measure expanded program services, recovery support enhancements, and participant characteristics. Proper data collection methodologies will be used by the Evaluator, including key informant interviews, focus groups, program observation, records abstraction, participant satisfaction surveys, and program document review.

Data Analysis. The evaluation will include relevant quantitative/quantitative analyses of the data collected, and a strict information confidentiality protocol will be followed.

Screening Tool: Cherished HEARTS uses TN-WITS to collect data, including assessment, arrests, incarcerations, co-occurring disorders, levels of care, discharge information, and other relevant

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

data. The Court team can retrieve data from TN-WITS on a daily basis through reporting functions and also request the development of customized reports. If awarded this grant, Cherished HEARTS will provide BJA proper reporting regarding the required performance measures. The Court is willing and able to report the data required through BJA's Performance Measurement Tool.

Data Reporting: Court staff members will complete quarterly reporting. Specifically, the Project Director will be responsible for working with the evaluation team members as they collect and prepare all data necessary for reporting. TN-WITS and data collected through the evaluation will be the primary sources of participant data, and will be used to satisfy all BJA reporting requirements. The Project Director will also support the state of Tennessee in developing its annual outcome report, which provides information about each district's admissions, substances used, discharges, graduations, termination rates/reasons, and retention rates.

Project Timeline: See Project Timeline web-based form submitted by Cherished HEARTS.

System Enhancements After the Grant Period: System enhancements created using grant funds will continue, depending on sustainable funding resources. Cherished HEARTS will use the customized data reporting capacity in TN-WITS to track and evaluate program progress. Internal quarterly reporting and quality control will be used to continue the project's enhancement efforts. The Evaluator will help develop a sustainability plan using data and information collected during the evaluation. The plan will help ensure continuity of services and staff beyond the grant period.

Metropolitan Government of Nashville and Davidson County
Cherished HEARTS Court Expansion and Enhancement Project
BJA Grant: O-BJA-2023-171509

Citations

ⁱ Human Trafficking is defined at the national level as the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act (sex trafficking), in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, *National Strategy to Combat Human Trafficking, January 2022* (see: <https://www.justice.gov/opa/press-release/file/1467431/download>) Note: human trafficking can also mean forced labor instead of commercial sex.

ⁱⁱ Cherished HEARTS notes sexual exploitation occurs when a person takes non-consensual or abusive sexual advantage of another for anyone's advantage or benefit other than the person being exploited.

ⁱⁱⁱ U.S. Census Bureau QuickFacts (see:

<https://www.census.gov/quickfacts/fact/table/TN,davidsoncountytennessee/SBO040217>)

^{iv} Tennessee Bureau of Investigation, TN Incident Based Reporting System, Accessed March 28, 2023.

^v Ibid.

^{vi} Cherished HEARTS data analysis.

^{vii} Tennessee Department of Health, Tennessee Drug Overdose Dashboard, Fatal Drug Overdose Trends by County (see: <https://www.tn.gov/health/health-program-areas/pdo/pdo/data-dashboard.html>)

^{viii} Ibid.

^{ix} Ibid (see: <https://www.tn.gov/health/health-program-areas/pdo/pdo/data-dashboard.html>)

^x Defining Drug Courts: 10 Key Components, Bureau of Justice Assistance in Collaboration with the National Association of Drug Court Professionals, 2004.

^{xi} National Association of Drug Court Professionals, Adult Drug Court Best Practice Standards, Volumes I and II, ©2018.

^{xii} Ohio Risk Assessment System is a validated tool used to guide the case plan by identifying risk factors – including criminal history, education/employment, family/social support, neighborhood problems, substance abuse, peer associations, and criminal attitude – that indicate a person's risk to reoffend and the needs that, when addressed, reduce the risk to reoffend.

^{xiii} Vera Institute of Justice Screening for Human Trafficking: Guidelines for Administering the Trafficking Victim Identification Tool (TVIT), 2014


Certificate Of Completion

Envelope Id: 5B0CB7B1901B475B944850AC6EF9447B	Status: Completed
Subject: Complete with DocuSign: GSCherished HEARTS Court Expansion and Enhancement Project 23-27 Ready.pdf	
Source Envelope:	
Document Pages: 47	Signatures: 7
Certificate Pages: 15	Initials: 1
AutoNav: Enabled	Envelope Originator:
Envelope Stamping: Enabled	Juanita Paulson
Time Zone: (UTC-06:00) Central Time (US & Canada)	730 2nd Ave. South 1st Floor
	Nashville, TN 37219
	Juanita.Paulsen@nashville.gov
	IP Address: 170.190.198.185

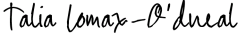
Record Tracking

Status: Original	Holder: Juanita Paulson	Location: DocuSign
10/23/2023 8:00:59 AM	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

Signer Events	Signature	Timestamp
Amanda Brown		Sent: 10/23/2023 8:09:13 AM
Amanda.Brown@nashville.gov		Viewed: 10/24/2023 10:03:40 AM
Security Level: Email, Account Authentication (None)		Signed: 10/24/2023 10:03:46 AM
	Signature Adoption: Pre-selected Style	
	Using IP Address: 170.190.198.185	

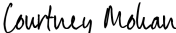
Electronic Record and Signature Disclosure:
 Accepted: 10/24/2023 10:03:40 AM
 ID: d7d9b1ad-4413-442f-ba48-83fb081303b8

Talia Lomax-O'dneal		Sent: 10/24/2023 10:03:48 AM
talia.lomaxodneal@nashville.gov		Resent: 10/24/2023 11:49:53 AM
Dep Dir of Finance		Viewed: 10/24/2023 12:25:14 PM
Security Level: Email, Account Authentication (None)	Signed: 10/24/2023 12:26:07 PM	
	Signature Adoption: Pre-selected Style	
	Using IP Address: 170.190.198.190	

Electronic Record and Signature Disclosure:
 Accepted: 10/24/2023 12:25:14 PM
 ID: 3e3ad274-f155-4553-995a-fe56f6f7379d

Kevin Crumbo/mjw		Sent: 10/24/2023 12:26:08 PM
MaryJo.Wiggins@nashville.gov		Viewed: 10/24/2023 1:43:53 PM
Security Level: Email, Account Authentication (None)		Signed: 10/24/2023 1:45:29 PM
	Signature Adoption: Pre-selected Style	
	Using IP Address: 170.190.198.190	

Electronic Record and Signature Disclosure:
 Accepted: 10/24/2023 1:43:53 PM
 ID: 3778d1b1-ab35-4b93-9fde-88e00f2503ea

Courtney Mohan		Sent: 10/24/2023 1:45:31 PM
Courtney.Mohan@nashville.gov		Viewed: 10/25/2023 8:33:30 AM
Security Level: Email, Account Authentication (None)		Signed: 10/25/2023 9:25:44 AM
	Signature Adoption: Pre-selected Style	
	Using IP Address: 170.190.198.185	

Signer Events	Signature	Timestamp
---------------	-----------	-----------

Electronic Record and Signature Disclosure:
Accepted: 10/25/2023 8:33:30 AM
ID: 54bc8799-9c17-42de-b688-e39f7e68179f

Balogun Cobb
balogun.cobb@nashville.gov
Security Level: Email, Account Authentication (None)

Balogun Cobb

Sent: 10/25/2023 9:25:46 AM
Viewed: 10/25/2023 10:55:09 AM
Signed: 10/25/2023 10:55:23 AM

Signature Adoption: Pre-selected Style
Using IP Address: 172.58.146.222
Signed using mobile

Electronic Record and Signature Disclosure:
Accepted: 10/25/2023 10:55:09 AM
ID: d829a448-422f-482e-82f7-45f746c5ef62

In Person Signer Events	Signature	Timestamp
-------------------------	-----------	-----------

Editor Delivery Events	Status	Timestamp
------------------------	--------	-----------

Agent Delivery Events	Status	Timestamp
-----------------------	--------	-----------

Intermediary Delivery Events	Status	Timestamp
------------------------------	--------	-----------

Certified Delivery Events	Status	Timestamp
---------------------------	--------	-----------

Carbon Copy Events	Status	Timestamp
--------------------	--------	-----------

Danielle Godin
Danielle.Godin@nashville.gov
Security Level: Email, Account Authentication (None)

COPIED

Sent: 10/25/2023 10:55:24 AM

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

Sally Palmer
sally.palmer@nashville.gov
Security Level: Email, Account Authentication (None)

COPIED

Sent: 10/25/2023 10:55:25 AM

Electronic Record and Signature Disclosure:
Accepted: 10/19/2023 8:31:41 AM
ID: 564644b2-e8bd-4939-98fb-03e95f1255e2

Witness Events	Signature	Timestamp
----------------	-----------	-----------

Notary Events	Signature	Timestamp
---------------	-----------	-----------

Envelope Summary Events	Status	Timestamps
-------------------------	--------	------------

Envelope Sent	Hashed/Encrypted	10/23/2023 8:09:13 AM
Envelope Updated	Security Checked	10/24/2023 11:49:52 AM
Envelope Updated	Security Checked	10/24/2023 11:49:52 AM
Envelope Updated	Security Checked	10/24/2023 11:49:52 AM
Envelope Updated	Security Checked	10/24/2023 11:49:52 AM
Certified Delivered	Security Checked	10/25/2023 10:55:09 AM
Signing Complete	Security Checked	10/25/2023 10:55:23 AM
Completed	Security Checked	10/25/2023 10:55:25 AM

Payment Events	Status	Timestamps
----------------	--------	------------

Electronic Record and Signature Disclosure
--