



2018 REQUEST FOR PROPOSALS

Programs that Enhance Law Enforcement's Response to Domestic Violence, Dating Violence, and Stalking

Deadline

All proposals are due by **11:59 p.m. ET on August 1, 2018**

Contact Information

For assistance with the requirements of this solicitation, contact:

Wioleta Gaddy at Gaddy_Wioleta@fcadv.org

NOTE: It is very important that applicants review the enclosed information carefully. Incomplete applications or applications that are submitted by non-eligible entities will not be considered for funding.

Program Description

Background

Services, Training, Officers and Prosecution (STOP), Violence Against Women Act (VAWA) formula grant funding supports Florida's efforts to provide a collaborative and well-coordinated, multidisciplinary approach to enhance advocacy and improve the criminal justice system's response to violence against women. Each of the STOP components: Services, Training, Officers and Prosecutors, are given priority to address strategies which are utilized to hold perpetrators accountable and provide critical services to victims/survivors. Florida's current STOP Implementation Plan focuses on developing a collaborative approach among law enforcement, prosecution agencies, the courts, and victim service providers to increase appropriate arrest and prosecution of these crimes while also increasing survivor safety. Strong partnerships exist at the community and statewide levels between each of the before mentioned systems to create a coordinated approach to responding to and eventually ending violence against women. Through STOP funding, FCADV and other experts are able to assist law enforcement agencies in rural counties and communities in maintaining their commitment to ensuring an appropriate and specialized law enforcement response to domestic violence, dating violence, and stalking.

The Programs that Enhance Law Enforcement's Response to Domestic Violence, Dating Violence, and Stalking (hereinafter Law Enforcement Enhanced Response) grant program creates a unique opportunity for select Florida communities to create or enhance law enforcement's response to victims/survivors of domestic violence, dating violence, and stalking. This program challenges the community to listen, communicate, identify problems, and share ideas that will result in new collaborative responses to ensure victim safety and offender accountability. One goal of the grant program is to help provide victims and survivors with the protection and services they deserve to experience safe and healthy lives, while improving the communities' capacity to hold offenders accountable for their crimes. Domestic violence, dating violence, and stalking are crimes that require the criminal justice system to **hold offenders accountable for their actions** through investigation, arrest, and prosecution of violent offenders, and through close judicial scrutiny and management of offender behavior. This grant program is designed to encourage local law enforcement agencies and their community partners to treat domestic violence, dating violence, and stalking as serious violations of criminal law requiring the coordinated involvement of the entire criminal justice system.

Additional priorities of Florida's aforementioned STOP implementation plan include the following:

- Training law enforcement officers to more effectively identify and respond to violent crimes against women, including the crimes of domestic violence, dating violence, and stalking;

- Developing, training, or expanding units of law enforcement officers specifically targeting violent crimes against women, including the crimes of domestic violence, dating violence, and stalking;
- Developing and/or enhancing Intimate Violence Enhanced Service Teams (InVEST) which is FCADV's program to reduce domestic violence homicides through enhanced advocacy and perpetrator accountability when there are known risk factors for homicide.¹
- Developing and implementing more effective police, court, and prosecution policies, protocols, orders, and services specifically devoted to identifying and responding to violent crimes against women, including the crimes of domestic violence, dating violence and stalking; and
- Developing, installing, or expanding data collection and communications systems, including computerized systems, linking police, prosecutors, and courts or for the purpose of identifying and tracking arrests, protection orders, violations of protection orders, prosecutions, and convictions for violent crimes against women, including the crimes of domestic violence, dating violence, and stalking.

Prior to determining project scope and priority areas for this grant program's funding, FCADV convened meetings with the Florida Police Chiefs Association (FPCA) and the Florida Sheriffs Association (FSA) to garner information regarding the statewide needs of law enforcement entities in relation to domestic violence, dating violence, and stalking. FPCA is comprised of more than 750 of the state's top law enforcement executives and serves municipal police departments, airport police, college and university police, private business and security firms, as well as federal, state and county law enforcement agencies. FPCA promotes legislation that would enhance public security by providing superior police protection for the residents of Florida and its many visitors. FPCA also provides communication, education, and training for the states' various police and security agencies.

FSA is one of the largest and most successful state law-enforcement associations in the nation and is comprised of the 67 Sheriffs of Florida as well as approximately 3,500 business leaders and 70,000 citizens throughout the state. FSA serves the citizens of Florida by supporting the needs of the state's law-enforcement community; works with lawmakers to push for positive changes in Florida's public safety arena; and, provides Sheriffs' Offices much-needed programs such as affordable training, special task forces and legislative and legal services.

Overwhelmingly, both Associations described a need for an enhanced coordinated community response to help prevent domestic violence homicide and a need for funding specifically to create or enhance law enforcement's response to domestic violence, dating violence, and stalking. Both urban and rural communities are encouraged to apply, however programs with emphasis on increasing law enforcement's response in rural communities will receive priority.

¹ For more information, see FCADV's InVEST webpage at: <http://fcadv.org/projects-programs/invest-program>

The *Law Enforcement Enhanced Response* grant program was structured to reflect the priorities of Florida's STOP Implementation Plan as well as input received from Florida's law enforcement associations. This grant program will support efforts to increase perpetrator accountability and enhance victim/survivor safety in Florida.

Purpose Areas

The Purpose Areas will focus on a specialized law enforcement response to the following: domestic violence, dating violence, and stalking in Florida. Survivors of domestic violence, dating violence, and stalking often confront unique challenges when seeking assistance such as the community's lack of knowledge about the dynamics of domestic violence, unsupportive attitudes, and/or a societal acceptance of domestic violence, dating violence, and stalking within their communities. **Agencies may choose from one or more of the below purpose areas.**

Purpose Area 1: Enhanced Domestic Violence Responses

This purpose area includes the creation or enhancement of a domestic violence unit within the law enforcement agency. Dedicated officers and detectives who specialize in the investigation of intimate partner violence and work collaboratively with the local certified domestic violence center and State Attorney's Office strengthen the criminal justice response to domestic violence. The Law Enforcement Enhanced Response Program is designed to provide victims and their children with protection and services while improving a community's capacity to hold batterers accountable.

Purpose Area 2: Stalking

Agencies may choose to enhance their response to stalking within the context of intimate partner violence. Stalking is a prevalent crime in domestic violence. Nearly three out of four victims of stalking report being stalked by their intimate or former partner.² The 2018 Faces of Fatality report identified that nearly 50% of the homicides reviewed by local teams included known stalking behavior on the part of the perpetrator.³ Agencies applying under this purpose area should include training for officers on recognizing and reporting stalking, evidence collection practices and stalking as a risk indicator to homicide in their project.

Purpose Area 3: Intimate Violence Enhanced Service Team

Intimate Violence Enhanced Service Team (InVEST) is a statewide initiative created specifically to reduce and prevent domestic violence homicides in Florida. FCADV and the Office of the Attorney General created the statewide model in 2006 and it has been successfully implemented in multiple Florida communities with high rates of domestic violence homicide. The model encourages the collaboration of multidisciplinary partners, such as law enforcement, certified domestic violence centers, state attorneys, courts and other providers to enhance offender

² Catalano, S., Smith, E., Snyder, H. & Rand, M. (2009). Bureau of Justice Statistics selected findings: Female victims of violence. Retrieved from <http://www.bjs.gov/content/pub/pdf/fvv.pdf>

³ The Florida Attorney General's Domestic Violence Fatality Review Team Annual Faces of Fatality Report. 2018.

accountability through increased service provision, monitoring of perpetrators and training on evidence based risk indicators to homicide.

Under this purpose area, law enforcement agencies may choose to include funding for an InVEST Advocate to be employed by the certified domestic violence center. In such cases, the letter of commitment from the certified domestic violence center must clearly indicate agreement with this additional request for funding and the estimated budget for the InVEST Advocate position shall be included in the application.

Domestic Violence: Florida statute 741.28. “Domestic violence” means any assault, aggravated assault, battery, aggravated battery, sexual assault, sexual battery, stalking, aggravated stalking, kidnapping, false imprisonment, or any criminal offense resulting in physical injury or death of one family or household member by another family or household member. "Family or household member" means spouses, former spouses, persons related by blood or marriage, persons who are presently residing together as if a family or who have resided together in the past as if a family, and persons who are parents of a child in common regardless of whether they have been married. With the exception of persons who have a child in common, the family or household members must be currently residing or have in the past resided together in the same single dwelling unit.

Dating Violence: Florida statute 784.046 (1) (d), “Dating violence” means violence between individuals who have or have had a continuing and significant relationship of a romantic or intimate nature. The existence of such a relationship shall be determined based on the consideration of the following factors:

- 1) A dating relationship must have existed within the past 6 months;
- 2) The nature of the relationship must have been characterized by the expectation of affection or sexual involvement between the parties; and,
- 3) The frequency and type of interaction between the persons involved in the relationship must have included that the persons have been involved over time and on a continuous basis during the course of the relationship.

The term does not include violence in a casual acquaintanceship or violence between individuals who have only engaged in ordinary fraternization in a business or social context.

Stalking: Stalking is a serious crime that often escalates over time and is on the rise in the State of Florida. During the 2012 legislative session, the criminal definition related to stalking was revised. Primarily the definition of “credible threat” was updated which is a component of aggravated stalking. A credible threat is not required to prove simple stalking. “Credible threat” was amended to protect a person who is a target of threats (including electronic communications) when the person is in reasonable fear for his or her safety or the safety of family members or of individuals closely associated with the person, and the stalker has the apparent ability to carry out the threat.

The revised definition of stalking (Florida Statute 784.048) which was effective October 1, 2012 also:

- Removes the requirement that the threat be against the life or bodily injury to the person and establishes a separate civil injunction for protection against stalking. The procedures created closely track the procedures for the injunction for protection against domestic violence;
- Provides a first-degree misdemeanor penalty for violating an injunction against stalking; and,
- Requires the court to consider issuing an order restraining a defendant from victim contact for up to ten years.

Program Requirements

FCADV will play an integral role in shaping and monitoring the projects, which will include intensive training, technical assistance (TA) and overall program guidance by FCADV staff and other identified providers. This will include, but not be limited to, onsite training and TA, frequent communication via email, phone and webinar, and annual monitoring. Funded law enforcement agencies and their designated staff must participate in all sponsored grant program activities. Successful applicants should expect to engage in intensive, proactive technical assistance for the duration of the grant period.

Applicants must commit to and demonstrate how they plan to improve the response to domestic violence, dating violence and stalking in their local communities. For example, applicants must describe in detail the barriers to effectively holding perpetrators accountable in their respective community. In addition, applicants will describe current community resources or lack of such and activities that coordinate systems, services, and resources. Please note that grantees will commit to only utilizing FCADV approved law enforcement risk assessment tool(s). Those agencies who do not wish to comply with this requirement, should not apply for this grant program.

Law enforcement agencies applying for this funding **must** commit to, at minimum, involving at least one certified domestic violence center in the development and implementation of the project. The first six months of the project will be a planning period, with a three month implementation stage and possible two-year continued funding period, based on the successful planning and initial implementation period (the first nine months of the project).

Activities that Compromise Survivor Safety

The following activities have been found to jeopardize survivor safety or allow offenders to escape responsibility for their actions:

- Procedures or policies that exclude survivors from receiving safe shelter, advocacy services, crisis intervention counseling, and other assistance based on their actual or perceived age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, disability, criminal record, work in the sex industry, or the age and/or gender of their children;
- Procedures or policies that compromise the confidentiality of information and privacy of persons receiving services;
- Procedures or policies that deny survivors access to services based on their relationship to the perpetrator;
- Mandating that domestic violence survivors participate in social service programs or domestic violence education classes in order to “drop” domestic violence charges that are filed against the perpetrator;
- Automatic pre-trial diversion programs;
- Mediation or counseling for couples as a systemic response to domestic violence or dating violence or any other manner of joint victim-offender communication;
- Requiring survivors to seek legal sanctions against the perpetrator or offender (e.g., seek a protection order, file formal complaint, force the victim to testify against the perpetrator or offender);
- Procedures that would penalize survivors of violence for failing to testify against their abusers or impose other sanctions on survivors;
- Imposing conditions on survivors of domestic or dating violence in order for them to receive services (e.g., requiring a survivor of domestic or dating violence to seek a protection order or counseling as a precondition to services); and
- The placement of perpetrators in anger management programs instead of Batterer Intervention Programs, or inappropriate sexual offender treatment programs.

Applications that propose activities that compromise survivor safety will be eliminated from further consideration entirely.

Out-of-Scope Activities

FCADV has determined the activities listed below to be out of the program scope. Applications that propose out-of-scope activities will receive a deduction of point(s) during the review process. Applications that are determined to be substantially outside the scope of the grant programs will not be considered for funding. The following activities are out-of-scope and will not be supported by grant funding:

- Research projects (This does not include program assessments conducted for internal improvement or grant reporting purposes);
- Criminal defense work, including defending women who assault, kill, or otherwise injure their partners; and
- Child abuse or family violence issues such as violence perpetrated by a child against a parent, or violence perpetrated by a sibling against another sibling.

Unallowable Activities

The following is a list of additional activities that are unallowable and cannot be supported by the grant programs. Applications that propose unallowable activities will receive a deduction of point(s) during the review process. Applications that include substantial unallowable activities will not be considered for funding.

- Prevention education efforts and media campaigns
- Lobbying
- Fundraising
- Purchase of real property or vehicles
- Construction
- Physical modifications to buildings, including minor renovations (such as painting or carpeting)

Accommodations and Language Access

Applicants are encouraged to allocate grant funds to support activities that help to ensure individuals with disabilities and Deaf or Hard of Hearing individuals and persons with limited English proficiency have meaningful and full access to their programs. For example, grant funds can be used to support American Sign Language (ASL) interpreter services, language interpretation and translation services, or the purchase of adaptive equipment. Applicants proposing to use grant funds to create websites, videos and other materials must ensure that they are accessible to persons with disabilities.

Eligibility Information

Eligible Applicants

It is very important that applicants review this information carefully. Applications that are submitted by ineligible entities or that do not meet all program eligibility requirements will not be considered for funding.

The Florida Coalition Against Domestic Violence (FCADV) will accept proposals from any of Florida's law enforcement agencies. This grant program focuses on creating or enhancing a specialized law enforcement response to domestic violence, dating violence, and stalking. Priority will be given to agencies whose jurisdiction includes one or more underserved and/or rural areas.

All agencies submitting an application for funding are advised that by accepting federal dollars under this Request for Proposals, as a sub-recipient they will be required to comply with all federal and state laws, executive orders, regulations and policies governing these funds. Prior to an award, all agencies must be found to be in good standing as indicated by the Federal Excluded Parties List System. <https://www.epls.gov/>

Award Information

Availability of Funds

All awards are subject to the availability of appropriated funds and any modifications or additional requirements that may be imposed by the Florida Department of Children and Families, FCADV, the U.S. Department of Justice, or Florida Statutes.

Award Period

The award period for the grant program will be 33 months. Commencement of awarded projects will be October 1, 2018 with an expiration of June 30, 2021. Applicants shall submit a **9-month budget for the planning and initial implementation phase of the project and a 12-month budget for the second and third years of the project** with this proposal. If awarded, grantees will receive a 9-month contract with the option to renew upon successful completion of the initial contract period.

Award Amounts

Applicants should carefully consider the resources needed to successfully implement the project proposed and present a realistic budget that accurately reflects project costs. Funding from this grant program will be awarded based upon the applicant's adherence to the Request for Proposals guidelines and purpose areas. Awarded projects shall not exceed \$150,000 annually each year of the project (subject to the availability of funds).

Application and Submission Information

Application Deadline

An application submission is complete if the application has been submitted **via email to gaddy_wioleta@fcadv.org** by the deadline and contains each required element. The deadline for applying for funding under this announcement is **11:59 p.m. ET on August 1, 2018**.

Hard copies of the application are not required. However, it is the applicant's responsibility to ensure they receive email verification that the application has been received by FCADV. Applicants should ensure plenty of time to verify FCADV's receipt of their application. It is anticipated that all applicants will be notified of the outcome of their application by **August 15, 2018**.

Intent to Apply

Applicants are strongly encouraged to submit an "Intent to Apply" email to gaddy_wioleta@fcadv.org by no later than **July 10, 2018**. In the "Subject" line of the email, please include: "Intent to Apply for *Law Enforcement Enhanced Response Funding*". Please include all chosen purpose areas in the letter of intent. Applicants who do not submit a letter of intent are still eligible to apply.

Pre-Application Questions

Applicants must email gaddy_wioleta@fcadv.org with questions related to clarifying the Request for Proposals. Questions will be accepted through July 10, 2018 and will be responded to no later than July 17, 2018. The questions and answers will be attached to this RFP and posted on FCADV's website at www.fcadv.org. Questions submitted after July 10, 2018, will not be accepted.

Schedule of Events

Activities	Date
Request for Proposal Available	June 12, 2018
Deadline for Submission	August 1, 2018; 11:59 p.m. ET
Notification of Awards	September 1, 2018
Project Initiation	October 1, 2018
Project Period	Nine-month planning and initial implementation period with option to renew 24 additional months after successful completion of the initial contract period.

Application Contents

This section describes what is included in a complete application package. Applicants should anticipate that failure to submit an application that contains all of the specified elements will result in the application not being considered for funding. It is the responsibility of the applicant to ensure that a complete application is submitted by the deadline. FCADV will not contact applicants for missing items. For each section listed below, please note the corresponding maximum point value that may be assigned during the peer review scoring process.

Formatting and Technical Requirements

Applicants must follow the requirements below. The proposal should follow the order below for easy reading.

- One-inch margins
- Type no smaller than 12-point, Times New Roman font
- Proposal Abstract (no more than one page, **single-spaced**)
- Project Narrative (no more than 15 pages, **double-spaced**)
- Letter of commitment from a certified domestic violence center
- Page numbers are highly encouraged, but not required
- The budget must be submitted in Excel format, not a PDF file

Proposal Abstract (10 points)

The Proposal Abstract must be in Microsoft Word format, single-spaced, and limited to one page. When read separately from the rest of the application, the Proposal Abstract is meant to serve as a succinct and accurate description of the proposed project and should concisely describe proposed project goals and objectives.

Proposal Narrative (65 points)

The Proposal Narrative must be double-spaced, and limited to 15 pages.

A. Purpose of the Application (20 points)

- Describe the jurisdiction, including county and community data, in which the project will be implemented;
- Describe the target population to be served; and
- Provide a detailed description of the needs for the project related to law enforcement's current response to domestic violence, dating violence, and stalking. Include gaps and barriers in the jurisdiction as it relates to the Purpose Area and targeted population(s).

This section will be rated on the extent to which the applicant addresses the above criteria.

B. What Will Be Done (25 points)

The applicant must provide a clear connection between the proposed activities and the need identified in the “Grant Program Purpose Area” section.

- Describe the **policies and procedures** that your agency has or will adopt to enhance a specialized and coordinated community response and/or InVEST Program to domestic violence, dating violence, and/or stalking;
- Describe in detail the proposed project as it relates to the Purpose Area;
 - Describe how funding will address the identified needs in the agency’s jurisdiction.
 - Describe how funding will assist the agency with the development and engagement of a coordinated community response and/or InVEST Program including partners, how often they will meet and how they will impact the project.
 - Describe how funding will assist the agency with strengthening and institutionalizing an appropriate response to domestic violence, dating violence, and/or stalking.
- Propose goals and objectives, specific tasks, and activities of the project. Activities must focus on the Purpose Area requirements, the needs in the jurisdiction and the plan to implement a specialized response to domestic violence, dating violence, and/or stalking;
- Describe the expected measurable outcomes of the proposed project;
- Describe any products to be revised, developed and/or distributed using grant funds (e.g., video, brochure, risk assessment tool), including why and how products will be tailored to meet the linguistic or cultural needs of victims and survivors of the agency’s jurisdiction; and
- Describe how the applicant is currently addressing victim safety and autonomy. The applicant should state what enhancements, if any, will be made through the proposed project.

This section will be rated on the extent to which the applicant addresses the above criteria, as well as the extent to which the project activities relate to the Purpose Area, are feasible and likely to succeed, and the extent to which project activities can realistically be completed within the grant period. Applicants are encouraged to allocate funding to project partners as appropriate for substantive participation in grant activities.

C. Activities Implementation Schedule (15 points)

A table or graph may be used for this section. If using a table or graph, the text within the table or graph may be single-spaced. The Implementation Schedule must still fall within the 15-page limit for the Proposal Narrative.

- Detail a 33-month activities implementation schedule. The schedule should indicate when project goals, objectives and activities will commence and how the project will progress. The schedule should clearly identify the activities in the planning phase vs. the implementation phase. Please note the planning phase should include the development and implementation of a community needs assessment and the development of a community action plan for the implementation phase.
- The schedule should indicate who is responsible for accomplishing each goal, objective and activity in both the planning and implementation phases.
- The schedule should also indicate how each goal, objective and activity will be accomplished.

This section will be rated on the extent to which the applicant clearly articulates reasonable and attainable goals, objectives and activities within the time allotted for the grant period.

D. Sustainability (5 points)

- Describe the organization's plan for the long-term sustainability of this project.

Applicants are required to include a sustainability plan to continue the project if funding were no longer available. This section will be rated on the extent to which the applicant addresses the above criteria.

Budget (15 points)

The applicant must provide detailed 9-month and 12-month line item Budgets, including a Budget Narrative, which should clearly demonstrate the relationship between expenditures and program content. Expenditure categories must fall within the A-M line items included in the budget template. Budget form instructions are also included as a guide to help prepare the budget on the required budget template form. The budget **MUST** be submitted in Excel format. Awarded applicants will be required to submit revised budgets for the second and third years of the project once the first 9 months have been successfully completed.

Compensation for Partners

In developing the budget, applicants should compensate all project partners for their participation in any substantive project-related activities, including but not limited to, compensation for time and travel expenses to participate in project development, training, and implementation. If a

partner is a State or local governmental agency and the partnership duties are conducted within the course of the agency's "regular" scope of work, applicants do not need to compensate the partner if the partner a) offers this arrangement; and b) an explanation of this arrangement is included in the application.

Matching Funds

Matching funds are required for this project. Match is calculated assuming that the federal award comprises only 75% of the project and the local match comprises 25% of the total project. For example, a total project is \$133,333: 75% = \$100,000 federal award and 25% = \$33,333 match. Matching funds may be provided by cash OR in-kind contributions such as the use of office space, supervision, additional department or officer time, etc. or, a combination of both cash and in-kind contributions. Federal funds are not an allowable funding stream to use as match in either cash or in-kind contributions. All in-kind contributions must be directly related to the STOP project. *Any award that is accepted by an applicant will constitute agreement to providing the match contribution whether in cash, in-kind, or a combination of both.*

This section will be rated on the extent to which the budget is reasonable and within the established limits, and the extent to which the budget costs correspond with proposed project activities.

Letter of Commitment (10 points)

A minimum of one letter of commitment from a certified domestic violence center is required. The letter should outline the center's role in the project. A letter of commitment from the local State Attorney's Office is encouraged but not required. Letters of commitment should align with the purpose area(s) applied for.

Application Review Information

Review and Selection Process

The grant application process will be competitive and applications will be reviewed by an external panel. Applications will be scored based on the degree to which the application responds to each section and addresses each element in the section. Furthermore, applications will be scored based upon the quality of the response and the level of detail provided. An application that is deemed to be substantially out of scope, proposes a substantial number of activities that are unallowable, or proposes activities that pose a significant threat to survivor safety or a serious breach of confidentiality will not be considered for funding.

If an application fails to meet the criteria listed below for an initial internal review, the application may not be reviewed by the external panel:

- Proposal was submitted via email by the deadline
- Proposal is complete
- Proposal meets page limit, font, layout and spacing requirements
- Proposal reflects the purpose areas

Each external panel member will review the information provided in the application against the selection criteria for the program. The total points possible for an application are 100 (10 points Proposal Abstract, 65 points for Narrative, 15 points for Budget, and 10 points for Letter(s) of Commitment). The review panel will be responsible for rendering funding decisions as related to the grant proposal. Applications with the highest composite scores will be considered for funding. Award recipients will be subject to monitoring and contract compliance by FCADV.

Past Performance Review

In addition to the review process described above, applicants with current or recent (within the last two fiscal years) FCADV awards will be reviewed based on the elements listed below. Please note that if the applicant has not met or completed any one of the following, points may be deducted from the application.

- Progress reports submitted by the applicant, in conjunction with monitoring conducted by FCADV, demonstrate the effectiveness of the current project, indicating timely progress toward meeting project goals and objectives;
- Adherence to programmatic and financial reporting requirements, including timely submission of required reports;
- Completion of close-out of prior awards in a timely manner including, but not limited to, timely submission of final reports;
- Appropriate utilization and active participation in FCADV-sponsored workshops and other technical assistance events as required by the current award;
- Timely resolution of issues identified in any audit or on-site financial or programmatic monitoring visit; and
- Timely expenditure of grant funds.