



Department of Commerce

Innovation is in our nature.

FFY 2015 Justice Assistance Grant Application

May 2015

For Legislative & Public Review

The U.S. Department of Justice has not released the program allocations to date.

The enclosed budget is based at program staff's best estimate of the pending award amount.

If the actual award is greater than projected the entire additional amount will be applied to the local government sub-awards (pass-through);

If the actual award is less than projected Admin, Evaluation and Pass-Through will be proportionately reduced as necessary.

Review window is May 15th to June 15th, with submission not later than June 16, 2015.

Diane Klontz
Assistant Director

**FFY 2015 JUSTICE ASSISTANCE GRANT APPLICATION
WASHINGTON STATE**

ABSTRACT

- Applicant:** Washington State Department of Commerce
- Project Title:** FFY 2015 Justice Assistance Grant - Washington State
- Goals of the Project:**
1. To support and enhance the criminal justice system in Washington State by reducing drug and organized gang crime, and related violence
 2. To maintain a statewide network of multi-jurisdictional drug-gang task forces and to encourage partnerships and collaboration with other local, state and federal criminal justice agencies
 3. To disrupt and dismantle criminal organizations involved in drug trafficking and gang violence, that are operating at a level above the capacity of most local jurisdictions to adequately investigate and prosecute
 4. To maintain an evaluation program that identifies local implementation of best practices and indicators of potential management concern, and also improves performance
- Description of the Strategies to be Used:**
- Four activities will be supported with Justice Assistance Grant Funds:
1. Regional multi-jurisdictional drug and gang task forces with integration of enforcement activities around mid- to upper-level criminal organizations having significant gang membership, inclusive of prosecutorial support
 2. Assignment of Washington State Patrol personnel to the regional multi-jurisdictional drug and gang task forces
 3. Evaluation, inclusive of peer review
 4. Administration with strong emphasis on compliance monitoring in conjunction with the peer review audits
- Drug trafficking above the street level is by nature near impossible to address on a jurisdiction-by-jurisdiction basis. Drug trafficking organizations operating across city, county, and state boundaries cannot be adequately investigated or disrupted and dismantled when only a portion of their operation is locally targeted. External funding is required to both encourage agencies to participate in the regional task forces, and to offset local revenues lost due to the current economic decline.
- Criminal organizations with active gang membership are an increasing problem at every level. These criminal organizations are most effectively addressed by applying active drug enforcement efforts in an integrated model. Depending upon location, between one-third and two-thirds of violent, property, and drug-related crime is attributed to gang activity.
- Corresponding Project Identifiers:** Drugs
Gangs
Evaluation

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PROGRAM NARRATIVE

State Justice Assistance Grant Strategy

The current strategy adopted by the Washington State Department of Commerce Justice Assistance Grant (JAG) Advisory Committee is a reflection of the state's current economic situation and the criminal justice community within the state. The strategy is to concentrate all available revenue to maintain the state's network of multi-jurisdictional drug and gang task forces to the maximum extent possible, rather than to dilute the impact of the funds by investing in multiple and diverse program types.

The multi-jurisdictional drug and gang task force program is supported by three activity types:

- Local Participation: Defined in terms of investigative strength and participating agencies, i.e. officers, administrative support, and prosecution.
- Washington State Patrol Participation: The assignment of State law enforcement personnel to local task forces, under local supervision.
- Project Evaluation: Peer review of operational elements, administrative and compliance monitoring, performance reporting, and data assessment.

The funding concepts for these three activity types are:

- Washington State Patrol (WSP) participation funding is to be preserved at essentially a fixed level in order to maintain prior state staffing implementation levels. Additional state funding will support any additional costs required to maintain previous staffing levels.
- Evaluation is maintained at essentially a fixed level to continue the peer review evaluation program. This program assesses task forces' performance in the adoption of best practices, highlights organizational and procedural weaknesses, and trains leadership on task force management by incorporating task force leadership in the reviewing team.
- The local participation component receives the balance of the pass-through funding. The available funding is initially divided evenly between the existing multi-jurisdictional drug and gang task forces as base funding. Those task forces able to maintain program compliance with the revised program model will receive all of their base funding, as well as a proportionate share of the funding deducted from the base of non-compliant task forces. Those task forces not able to maintain program fidelity with the revised task force model will have their base funding reduced proportionate to their drop below the model's staffing and participation standards. Proportionate reduction applies only up to the point that residual operations fail to maintain any of the value-added benefits of the task force model, and officer safety or prosecutorial capacity is threatened. At that point, those projects are considered ineligible for funding.

Maintenance of WSP participation is essential to a number of task force's ability to comply with the program model. Smaller agencies often have to recall officers to cover essential patrol duties. For those task forces classified as "rural," WSP participation will count as "local" participation for the purpose of model compliance. Beyond program compliance, WSP participation yields another benefit to the local task forces in that the JAG funds effectively leverage state funds to fully support the number of state officers dedicated to the program. The task forces gain more officers for each grant dollar expended through WSP, than through a direct award to a local sub-recipient.

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The graduated penalty for not complying with the revised program model incorporates several aspects regarding task force performance:

- It penalizes poor performance and/or participation.
- It keeps the penalty proportionate to the reduction in model compliance.
- It maintains a base of task force funding, from which the program may more easily recover. Essential organizational infrastructure remains to serve as a base for re-qualification, whereas restructuring from zero is a three- to four-year process at best.
- It establishes a minimal program model compliance level below which the value-added and officer safety benefits inherent in the task force model are lost, and moreover JAG funding is lost.
- It mitigates or delays the negative impact of a task force's collapse on their neighbors, whereby drug trafficking organizations and gangs may spread their impact into adjacent jurisdictions by the creation of an enforcement void.

How Local Communities are Engaged in the Planning Process

Local communities, as geographic communities and/or jurisdictions are not primarily engaged in the planning process. However, communities of interest such as victims, prosecution, courts, interventionists, etc., are engaged in the process through their primary state-level interest groups and networks (refer to "Stakeholders" below).

Stakeholders Participating in the Planning Process

The JAG Advisory Committee is comprised of representatives of the following interest and stakeholder groups. Many of these groups' active leadership constitute the representation of regional associations and interest groups.

- Office of the Governor
- Washington State Association of Counties: County commissioners
- Washington Association of Prosecuting Attorneys
- Washington Administrative Office of the Courts
- Washington Association of Sheriffs & Police Chiefs: One member of each classification
- Violent Crime Victims Services
- County Human Services: Crime prevention expertise
- Public Health Services: Treatment and intervention expertise
- Washington State Department of Corrections
- Washington State University: Representing multiple disciplines and interests
- United States Attorney's Offices: Non-voting member
- Washington State Department of Commerce: Administration, grant management, requested data and analyses

Data and Analysis Utilized to Support the Plan

- Historical and local data, a city/county aggregate
- Criminal justice revenues, via the Office of Financial Management's Washington State Data Book
- Comparative program performance
- Comparative program participation and staffing

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- Summary of local task force future staffing and participation, as well as local expectations on program continuation
- Informal extrapolation of the last completed Needs and Gaps Analysis

Gaps in Criminal Justice Resources

Prior to the board's recommendations on January 7, 2015, the Department of Commerce conducted an informal Needs and Gap Analysis of the Criminal Justice System's primary components in September-October 2012. While essential funding of each primary component has been negatively impacted by reductions in state and local revenues, and in federal grant funds, the primary funding streams of each remain in place.

The primary need identified in this analysis was drug investigations above the level that may be adequately conducted by local agencies. This component previously received slightly more than \$500,000 in state funding a year, and is eliminated in the current budget proposals of the Governor, House and Senate.. This precarious funding at the state level leaves JAG as the sole, external funding available to stabilize and maintain the multi-jurisdictional drug and gang task force program. At that time, it was estimated that up to one-third of the existing task forces in the state were in danger of folding if funding could not be maintained.

A partial Needs and Gaps Analysis was initiated and provided to the JAG Advisory Committee for use in formulating the federal fiscal year 2015 JAG program recommendations. This analysis is conducted on a biennial basis, set one year behind the state Legislature's budget cycle.

Note: A key difference between Washington State's criminal justice budget and strategy, compared to those of most other states, is that the chief law enforcement agencies of the state are the county sheriffs, not an agency of the state government. As such, the primary responsibility for funding law enforcement initiatives is normally considered a county, not a state function. Washington normally only accepts funding responsibility for specific initiatives implemented at the local level when the underlying issues addressed cross boundaries, or are clearly beyond the existing capacity of local governments to address.

JAG Fund Coordination with State and Related Justice Funding

The application of JAG funds are made in conjunction with various other funds in several ways:

- First, intentionally not duplicating the effort of any criminal justice system component's primary funding.
- Second, reinforcing and amplifying existing efforts to support approved criminal justice system components. WSP systemically lacks the capacity to dedicate assignment of its personnel to more than a few of the task forces. However, application of JAG funds in conjunction with that of WSP enables the state to provide officers to the majority of task forces, on a per officer cost basis to the JAG fund that is less than the cost of locally hired officers.
- Third, providing a base for other program support and assistance. By holding the local task forces together and ensuring sound management and reporting, JAG funds provide a base to which other funds—notably those of the Western State's Information Network (WSIN), the Northwest High Intensity Drug Trafficking Area (NWHIDTA), and those of the state's fusion center—may be reinforced and amplified.

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Additional Strategic Planning and Coordination Efforts of the State Administering Agency (SAA) with Other Criminal Justice Agencies

The current strategy, by concentrating its efforts in one primary program area, does not in and of itself require the breadth and depth of coordination undertaken when supporting multiple program areas. However, the SAA is actively involved in the following strategic planning and coordination efforts:

- **WSP Task Force Training of Commanders and Supervisors:** The SAA requires the leadership of supported task forces to attend the semi-annual conferences coordinated by the Washington State Patrol. Coordination generically includes new trends and concerns of the SAA, WSP, WSIN, NWHIDTA, United States Drug Enforcement Administration (DEA), and Oregon’s narcotics task force program. Local, state, & national trends, best practices, and lessons learned are incorporated and presented.
- **WSP Task Force Training on Drug and Gang Basics:** The SAA periodically surveys the task forces it supports to ensure that assigned personnel are properly trained. When data indicates that training is lagging due to a lack of training opportunities, as opposed to local funding or supervisor attentiveness issues, the SAA coordinates with WSP to take the lead and to coordinate additional training opportunities—whether through the standard DEA Drug Basic sessions or by locally conducted training with equivalent curriculum, speakers, and facilities to standard.
- **WSP and Peer Review Evaluation:** The SAA funds and coordinates with WSP for the operational and management evaluation of the task forces it funds. WSP in turn brings in other city and county law enforcement managers to review operational records and protocols which the SAA is not qualified to assess. This additionally keeps the SAA out of case sensitive records, while providing the evaluated agencies an added incentive to respond and comply.
- **Washington Association of Sheriffs and Police Chiefs (WASPC):** The SAA is partnering with WASPC to address the state’s shortfalls in complying with the provisions of the Sex Offender Registration and Notification Act.
- **WSIN:** The SAA requires the task forces it supports to utilize the Western States Information Network’s event and suspect deconfliction and intelligence functions, and has coordinated with WSIN to develop a standardized utilization report to avoid the variances in data reporting that have previously crept in as task forces individually attempted to interpret their use with our standardized performance measurements.
- **NWHIDTA:** The SAA sends a representative to participate in NWHIDTA’s Law and Justice Committee along with DEA, Federal Bureau of Investigation, Border Patrol, U.S. Attorney’s Offices, WSP, and other agencies to review drug trends and initiatives.

Plan for Collecting and Submitting Performance Measurement Data

The SAA will conduct a pre-contracting review of the Performance Management Tool (PMT) and other reporting and data requirements of the Justice Assistance Grant in April-May 2016, and release a revision of its Periodic Activity Report (PAR) prior to the beginning of the first quarter of the July 2016 – June 2017 sub-award cycle. The sub-award application and the associated certification and assurances packages will also be reviewed/revised in April-May 2016 to capture baseline data prior to the contracting decisions.

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All sub-recipients are required to submit a PAR by the middle of the month, following the end of each calendar quarter. Upon receipt of each sub-recipient's report, the data is reviewed for completeness, and several validity checks are made for report consistency and accuracy. Those data elements required for the PMT are entered into that system. Should a sub-recipient's report not be received in time for the SAA to enter it into the PMT in timely fashion, the sub-recipient is deemed to be out of compliance, and is denied reimbursement for that quarter.

Funding Priorities

The funding priorities for the federal fiscal year 2015 Justice Assistance Grant are:

1. Multi-Jurisdictional Drug and Gang Task Forces
2. Washington State Patrol participation in multi-jurisdictional drug and gang task forces
3. Evaluation
4. Administration

Description of the Programs to be Funded

1. Multi-Jurisdictional Drug and Gang Task Forces:

The defining characteristics are:

- Created and operated in accordance with a formal interagency agreement defining roles and responsibilities of participating agencies, supervision and management of assets.
- Multiple local agencies participating through the assignment of personnel to the task force.
 - Local agency participation and personnel dedication is considered fulfilled by contribution from local agencies of funding sufficient for another participant to receiving those funds to hire and dedicate personnel to the task force which would otherwise not be so assigned.
 - For task forces characterized under a 'counties like us' grouping as 'rural', Washington State Patrol participation and personnel dedication will satisfy the requirement for one local agency.
- At a minimum, the following number and types of personnel will be dedicated to a task force:
 - Four law enforcement officers.
 - One half-time support staff.
 - Either one half-time prosecutorial support staff or the demonstration that no task force generated case is not prosecuted due to lack of prosecutorial support.
- The primary mission: The investigation and disruption of drug trafficking, gang and violent criminal organizations, at investigative levels above the sustainable capacity of individual local jurisdictions.

2. WSP Participation within Multi-Jurisdictional Drug and Gang Task Forces:

Assignment of experienced detective and/or supervisory personnel to work within regional multi-jurisdictional drug and gang task forces, and under the supervision of the local agency or executive board which has oversight and responsibility for that task force. Assigned individuals are to provide consistency of assigned investigators, minimize the training time required for newly assigned investigators, and facilitate the acquisition of additional resources i.e. equipment, when required.

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3. Evaluation:

- Peer Review Evaluation: Management, operation, and administrative task force review by a team consisting of at least a sheriff or police chief, task force supervisor, task force office manager, prosecutor, peer review coordinator, and a SAA representative. Such a review involves interviewing everyone in the task force—its supervisory chain and the majority of its executives or governing board- and reviewing all policies and procedures, case records, cross-walking funds and evidence through initial disbursement, informant, the buy, seizure and arrest records, evidence room records and inventory, and any cash returns. Each on-site review lasts between two and three days, and each task force is subject to such a review at least every 36 months.
- Peer Review Follow-Up: Not later than six months after the peer review evaluation, an on-site follow-up is conducted to assess the corrective actions and procedural modifications made in response to the peer review evaluation.
- Self-Assessments: One and two years after the peer review, each task force conducts a self-review of its operations addressing the same elements targeted in the peer review evaluation, and goes over the current status of each operational aspect of the task force with WSP's evaluator and SAA's Program Manager/s.
- Administrative and Compliance Monitoring: A review conducted by SAA staff of federal grant and state program pre-requisites, including fiscal management, property management, DUNS Numbers and CCR Registration, multiple Civil Rights and related issues, and sub-recipient compliance. Dependent upon recent program requirement changes and the date of the last or next peer review, select operational concerns may also be reviewed. These reviews are normally conducted within one month prior to a peer review evaluation, with the results furnished to the Peer Review Team. A second administrative and compliance review is conducted approximately 18 months later, halfway between peer reviews.
- Report and Application Analysis: Individual, systemic, and comparative analysis of application (baseline) and quarterly activity reports. Systemic analysis is conducted on a cyclic basis—prior to contracting and then following the end of each calendar quarter—to assess the validity of data and catch common errors before data system entry and submission, as well as to ensure that comparative analysis is conducted on standardized data. Comparative analysis is normally conducted on a 'Counties Like Us' basis and seeks to bring both outstanding and apparently poor performance to the attention of the SAA and the sub-recipient. Individual analysis is conducted to gain a more thorough understanding of a specific sub-recipient's performance and its underlying causes.

4. Administration:

Administration consists of all other functions necessary to administer the program, and includes, but is not limited to, the following primary duties:

- Supporting the Justice Assistance Grant Advisory Committee.
- Preparing program applications and contracts, and their supporting databases and files.
- Establishing quarterly activity report templates and supporting data files; entering sub-recipient reports; data extraction and entry into the Performance Management Tool (PMT); and annual data entry into the federal Grant Management System (GMS).

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- Coordinating with other agencies related to the criminal justice system and the multi-jurisdictional drug and gang task force program, primarily WSP, NWHIDTA, and WASPC.
- Technical assistance to program sub-recipients.
- Review and processing of sub-recipient reimbursement requests.

Sub-Grant Award Process

The normal process for sub-recipient selection is not being used this year as all the areas capable of supporting multi-jurisdictional drug and gang task forces are already participating in the program. Even if a new area was to become capable of supporting a task force, the limited funding available is not sufficient to maintain the existing task force network and add a new task force.

Therefore, the 19 existing task forces will be offered a funding base (1/19th of the task force pass-through funding) as a planning figure in the application. If any existing sub-recipient cannot meet the task forces' program model, it will be offered reduced funding depending upon its level of participation and staffing, with funding being zeroed out at the level where the expected task force performance level does not have any advantage over that of the aggregate individually assigned officers. Any applicant facing a reduction will be informed and offered a brief period in which to revise their application, if possible, before their funding is reallocated.

Any reduction in the base funding for a task force will be proportionately re-distributed to those sub-recipients which do comply with the task force model.

A special condition will cause a quarterly program model compliance review, and reduce funding available for the reported quarter according to the same scheme used at the time of application. Compliance with the program model after contracting will not increase funding levels since the individual task force's reduction has already been re-allocated.

The application and pre-award process requires each sub-recipient to complete a basic grant application providing enough data to determine whether they comply with the task force model, and to establish a performance and data baseline. Certifications of assurance addressing all federal and program prerequisites will be included in the application package.

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BUDGET AND BUDGET NARRATIVE

Budget Overview & Control Percentages

<u>Category</u>	<u>Local</u>	<u>State</u>	<u>Sub-Total</u>	<u>Total</u>	<u>Category Distribution</u>
Administration	\$207,156	\$80,099	\$287,255	\$287,255	8.10%
Evaluation	\$250,293		\$250,293	\$250,293	7.06%
PassThru					
Drug/Gang Task Forces	\$2,098,795		\$2,098,795	\$3,007,087	84.84%
WSP Drug/Gang Task Force Participation		\$908,292	\$908,292		
	<u>\$2,556,245</u>	<u>\$988,391</u>	<u>\$3,544,635</u>	<u>\$3,544,635</u>	100.00%
	72.12%	27.88%			

Note: The 72.12% allocation of funds to local activities exceeds the States's 62.8% Variable Pass-Through Percentage.

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Administrative Allocation Breakdown:

A - Personnel

Richard Torrance	Unit Manager	<u>\$86,736</u> /Yr	x	<u>0.30</u> FTE	=	<u>\$26,021</u>
Ashley Wancha	Administrative Assistant	<u>\$31,176</u> /Yr	x	<u>0.30</u> FTE	=	<u>\$9,353</u>
Bill Johnston	Program Manager	<u>\$68,016</u> /Yr	x	<u>0.60</u> FTE	=	<u>\$40,810</u>
Harvey Queen	Program Manager	<u>\$64,740</u> /Yr	x	<u>0.15</u> FTE	=	<u>\$9,711</u>
Vacant Commerce 3	Program Manager	<u>\$64,740</u> /Yr	x	<u>0.60</u> FTE	=	<u>\$38,844</u>
Naomi Ramos	Budget Analyst	<u>\$66,420</u> /Yr	x	<u>0.30</u> FTE	=	<u>\$19,926</u>
Connie Scumate	Operations Manager	<u>\$75,264</u> /Yr	x	<u>0.05</u> FTE	=	<u>\$3,763</u>
Personnel Sub-Total:				2.30 FTEs		\$148,428

B - Fringe Benefits

Retirement	<u>\$148,428</u> Total Salary/Yr	x	<u>0.053</u> Rate	=	<u>\$7,800</u>
OASI	<u>\$148,428</u> Total Salary/Yr	x	<u>0.061</u> Rate	=	<u>\$9,113</u>
Medicare	<u>\$148,428</u> Total Salary/Yr	x	<u>0.014</u> Rate	=	<u>\$2,133</u>
Med Aid and Industrial	<u>\$148,428</u> Total Salary/Yr	x	<u>0.005</u> Rate	=	<u>\$812</u>
Health Insurance	<u>2.30</u> FTE	x	<u>\$850.00</u> Rate	=	<u>\$1,955</u>
Fringe Benefit Sub-Total:					<u>\$21,813</u>

Total Personnel & Fringe Benefits: \$170,241

C - Travel

NW HIDTA Meetings and Training

Olympia - Seattle	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc (Parking)	Vehicle Cost/Trip	Year	
124 x	\$0.11 +	1 x	\$25.00 +	\$16 =	\$55 x	5 =	\$275

D - Equipment

\$0

E - Supplies and Services

Supplies	\$444 /FTE (Std Planning Figure) x 2.3 FTE's =	<u>\$1,021</u>
Rent	\$5,736 /FTE (Std Planning Figure) x 2.3 FTE's =	<u>\$13,193</u>
Seat of Government Fee	\$250 /FTE (Std Planning Figure) x 2.3 FTE's =	<u>\$575</u>
PC Appl Licensing	\$420 /FTE (Std Planning Figure) x 2.3 FTE's =	<u>\$966</u>
Computer Station (replacement)	\$796 /FTE (Std Planning Figure) x 2.3 FTE's =	<u>\$1,831</u>
Citrix (Remote LAN Access)	\$90 /FTE (Std Planning Figure) x 2.3 FTE's =	<u>\$207</u>
Professional Development (Training)	\$872 /FTE (Std Planning Figure) x 2.3 FTE's =	<u>\$2,006</u>
Collective Bargaining (Classified FTEs)	\$68 /FTE (Std Planning Figure) x 2 FTE's =	<u>\$136</u>
Dept of Personnel Fees	\$306 /FTE (Std Planning Figure) x 2 FTE's =	<u>\$704</u>
Total Goods & Services:		\$20,639

F - Consultants/Contracts (agency/s research unit assistance in evaluation planning) \$36,516

G - Other (Indirect) HUD approved rate of 0.35 x \$170,241 (Combined Salary & Benefits) = \$59,584

Total Administration: \$287,255

Administrative Budget Summary

Salaries	2.30 FTEs	\$ 148,428
Fringe Benefits		<u>\$ 21,813</u>
Total Personnel & Fringe Benefits		\$ 170,241
Travel		\$275
Equipment		\$ -
Supplies & Services		\$ 20,639
Consultants/Contracts		\$ 36,516
Other (Indirect)		<u>\$ 59,584</u>
Total Administrative Budget		\$ 287,255

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Evaluation Allocation Breakdown:

A - Personnel

Richard Torrance	Unit Manager	<u>\$86,736</u> /Yr	x	<u>0.20</u>	FTE	=	<u>\$26,021</u>
Bill Johnston	Program Manager	<u>\$68,016</u> /Yr	x	<u>0.40</u>	FTE	=	<u>\$27,206</u>
Harvey Queen	Program Manager	<u>\$64,740</u> /Yr	x	<u>0.33</u>	FTE	=	<u>\$21,364</u>
Personnel Sub-Total:				0.93	FTEs		\$48,570

B - Fringe Benefits

Retirement		<u>\$48,570</u>		Total Salary/Yr	x	<u>0.053</u>	Rate	=	<u>\$2,552</u>
OASI		<u>\$48,570</u>		Total Salary/Yr	x	<u>0.061</u>	Rate	=	<u>\$2,982</u>
Medicare		<u>\$48,570</u>		Total Salary/Yr	x	<u>0.014</u>	Rate	=	<u>\$698</u>
Med Aid and Industrial		<u>\$48,570</u>		Total Salary/Yr	x	<u>0.005</u>	Rate	=	<u>\$266</u>
Health Insurance		<u>0.93</u>		Total Salary/Yr	x	<u>\$850/Yr</u>	Rate	=	<u>\$791</u>

Fringe Benefit Sub-Total: \$7,289

Total Personnel & Fringe Benefits: \$55,859

C - Travel

Monitoring

Olympia - Aberdeen	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
100	\$0.11	1	\$25	\$0	\$36	
					Trip Total =	\$36
Olympia - Auburn	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
84	\$0.11	1	\$25	\$0	\$34	
					Trip Total =	\$34
Olympia - Bellevue	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
125	\$0.11	1	\$25	\$0	\$39	
					Trip Total =	\$39
Olympia - Chelan	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
378	\$0.11	2	\$25	\$0	\$92	
					Trip Total =	\$92
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	1	\$46	\$14	1	\$60	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	1	\$83	\$8	1	\$91	
					Trip Total =	\$243
Olympia - Vancouver	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
212	\$0.11	1	\$25	\$0	\$48	
					Trip Total =	\$48
Olympia - Port Angeles	Mileage Rate	Vehicle Days	Vehicle Rate	Bridge Toll	Vehicle Total	
240	\$0.11	2	\$25	\$5	\$81	
					Trip Total =	\$81
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	1	\$61	\$18	1	\$79	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	1	\$128	\$12	1	\$140	
					Trip Total =	\$300
Olympia - Tumwater	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
15	\$0.11	1	\$25	\$0	\$27	
					Trip Total =	\$27
Olympia - Kelso	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
134	\$0.11	1	\$25	\$0	\$40	
					Trip Total =	\$40

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Olympia - Okanogan	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
	556	\$0.11	1	\$25	\$0	\$86
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	2	\$46	\$0	1	\$92	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	1	\$83	\$8	1	\$91	
					Trip Total =	\$269
Olympia - Everett	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
	190	\$0.11	1	\$25	\$0	\$46
					Trip Total =	\$46
Olympia - Bellingham	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
	300	\$0.11	3	\$25	\$0	\$108
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	2	\$46	\$14	1	\$106	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	2	\$83	\$8	1	\$174	
					Trip Total =	\$388
Olympia - Pullman & Yakima	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
	853	\$0.11	3	\$25	\$0	\$169
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	2	\$46	\$0	1	\$92	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	2	\$83	\$8	1	\$174	
					Trip Total =	\$435
					Monitoring Sub-Total:	\$1,905
Peer Review						
Port Angeles - Bellevue	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
	215	\$0.30	4	\$30	\$35	\$220
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	4	\$71	\$0	1	\$284	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	3	\$190	\$18	1	\$588	
					Trip Total =	\$1,092
Port Angeles - Vancouver	Mileage Rate	Vehicle Days	Vehicle Rate	Bridge Toll	Vehicle Total	
	489	\$0.30	5	\$30	\$5	\$302
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	5	\$56	\$17	1	\$297	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	3	\$137	\$13	1	\$424	
					Trip Total =	\$1,023
Port Angeles - Kelso	Mileage Rate	Vehicle Days	Vehicle Rate	Bridge Toll	Vehicle Total	
	520	\$0.30	5	\$30	\$5	\$311
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	5	\$56	\$17	1	\$297	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	3	\$137	\$13	1	\$424	
					Trip Total =	\$1,032
Port Angeles - Ephrata	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
	520	\$0.30	5	\$30	\$35	\$341
	PerDiemDays	PerDiemRate	Partial PerDiem	Persons	PerDiem Total	
	5	\$46	\$14	1	\$244	
	LodgingNights	LodgingRate	Est Tax	Persons	Lodging Total	
	3	\$83	\$8	1	\$257	
					Trip Total =	\$842

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Port Angeles - Okanogan	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
460	\$0.30	5	\$30	\$35	\$323	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
5	\$46	\$14		1	\$244	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
3	\$83	\$8		1	\$257	
					<u>Trip Total =</u>	\$824
Port Angeles - Tumwater	Mileage Rate	Vehicle Days	Vehicle Rate	Bridge Toll	Vehicle Total	
274	\$0.30	5	\$30	\$5	\$237	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
5	\$61	\$18		1	\$323	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
3	\$98	\$9		1	\$303	
					<u>Trip Total =</u>	\$863
Port Angeles - Pullman	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
765	\$0.30	5	\$30	\$35	\$415	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
5	\$46	\$0		1	\$230	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
3	\$83	\$8		1	\$257	
					<u>Trip Total =</u>	\$902
				Peer Review Sub-Total:		\$6,578
Peer Review Follow-Up						
Port Angeles - Kennewick	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
645	\$0.30	5	\$30	\$35	\$379	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
3	\$46	\$0		1	\$138	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
2	\$92	\$9		1	\$193	
					<u>Trip Total =</u>	\$710
Port Angeles - Wenatchee	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
600	\$0.30	1	\$30	\$35	\$245	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
3	\$46	\$0		1	\$138	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
2	\$83	\$8		1	\$174	
					<u>Trip Total =</u>	\$557
Port Angeles - Pullman-Spokane	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
890	\$0.30	5	\$30	\$35	\$452	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
4	\$61	\$0		1	\$244	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
3	\$88	\$8		1	\$272	
					<u>Trip Total =</u>	\$968
Port Angeles - Bellingham	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total	
240	\$0.30	3	\$30	\$35	\$197	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
2	\$45	\$14		1	\$104	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
1	\$83	\$8		1	\$91	
					<u>Trip Total =</u>	\$392
Olympia - Auburn	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
84	\$0.11	1	\$25	\$0	\$34	
					<u>Trip Total =</u>	\$34

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Olympia - Aberdeen	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
100	\$0.11	1	\$25	\$0	\$36	
						Trip Total = \$36
Olympia - Bellevue	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
125	\$0.11	1	\$25	\$0	\$39	
						Trip Total = \$39
Olympia - Vancouver	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
212	\$0.11	3	\$25	\$0	\$98	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
1	\$56	\$31		1	\$87	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
1	\$137	\$13		1	\$150	
						Trip Total = \$335
Olympia - Kelso	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
134	\$0.11	1	\$25	\$5	\$45	
						Trip Total = \$45
Olympia - Ephrata	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
454	\$0.11	3	\$25	\$0	\$125	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
1	\$46	\$25		1	\$71	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
1	\$83	\$8		1	\$91	
						Trip Total = \$287
Olympia - Bremerton	Mileage Rate	Vehicle Days	Vehicle Rate	Bridge Toll	Vehicle Total	
125	\$0.11	1	\$25	\$5	\$44	
						Trip Total = \$44
Olympia - Tumwater	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
15	\$0.11	2	\$25	\$0	\$52	
						Trip Total = \$52
Port Angeles - Okanogan	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
570	\$0.11	3	\$25	\$10	\$148	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
1	\$46	\$25		1	\$71	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
1	\$83	\$8		1	\$91	
						Trip Total = \$310
Olympia - Tacoma	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Parking	Vehicle Total	
65	\$0.11	2	\$25	\$15	\$72	
						Trip Total = \$72
Olympia - Yakima	Mileage Rate	Vehicle Days	Vehicle Rate	Vehicle Misc	Vehicle Total	
440	\$0.11	3	\$25	\$0	\$123	
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total	
1	\$46	\$25		1	\$71	
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total	
1	\$83	\$8		1	\$91	
						Trip Total = \$285

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Port Angeles - Mount Vernon	Mileage Rate	Vehicle Days	Vehicle Rate	Ferry Toll	Vehicle Total
	190	\$0.30	3	\$30	\$35
					\$182
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total
1	\$61	\$33		1	\$94
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total
1	\$85	\$8		1	\$93
					<u>Trip Total = \$369</u>

Port Angeles - Vancouver	Mileage Rate	Vehicle Days	Vehicle Rate	Bridge Toll	Vehicle Total
	474	\$0.30	3	\$30	\$5
					\$237
PerDiemDays	PerDiemRate	Partial PerDiem		Persons	PerDiem Total
1	\$56	\$31		1	\$87
LodgingNights	LodgingRate	Est Tax		Persons	Lodging Total
1	\$137	\$13		1	\$150
					<u>Trip Total = \$474</u>

Follow-Up Sub-Total: \$5,009

Total Travel: \$13,492

D – Equipment

Replacement Computers (Laptops) \$1,504 (life cycle planning figure) x 2 ea \$3,008

E – Supplies and Services

Supplies	\$444 /FTE (Std Planning Figure) x 0.93 FTE's =	\$413
Rent	\$5,736 /FTE (Std Planning Figure) x 0.93 FTE's =	\$5,334
Seat of Government Fee	\$250 /FTE (Std Planning Figure) x 0.93 FTE's =	\$233
PC Appl Licensing	\$420 /FTE (Std Planning Figure) x 0.93 FTE's =	\$391
Computer Station (replacement)	\$796 /FTE (Std Planning Figure) x 0.93 FTE's =	\$740
Citrix (Remote LAN Access)	\$90 /FTE (Std Planning Figure) x 0.93 FTE's =	\$84
Professional Development (Training)	\$872 /FTE (Std Planning Figure) x 0.93 FTE's =	\$811
Collective Bargaining (Classified FTEs)	\$68 /FTE (Std Planning Figure) x 0.73 FTE's =	\$92
Dept of Personnel Fees	\$306 /FTE (Std Planning Figure) x 0.93 FTE's =	\$285
	<u>Total Goods & Services:</u>	<u>\$8,383</u>

F - Consultants/Contract: Contract with the Washington State Patrol for a law enforcement qualified researcher to coordinate the Peer Review program, and defer local participant travel expenses \$150,000

G - Other (Indirect) HUD approved rate of 0.35 x \$55,859 (Combined Salary & Benefits) = \$19,551

Total Evaluation: \$250,293

Evaluation Budget Summary

Salaries	0.93 FTEs	\$ 48,570
Fringe Benefits		<u>\$ 7,289</u>
Total Personnel & Fringe Benefits		\$ 55,859
Travel		\$ 13,492
Equipment		\$ 3,008
Supplies & Services		\$ 8,383
Consultants/Contracts		\$ 150,000
Other (Indirect)		<u>\$ 19,551</u>
Total Administrative Budget		\$ 250,293

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Pass Through Allocation Breakdown:

A - Personnel		\$0
B - Fringe Benefits		<u>\$0</u>
Total Personnel & Fringe Benefits:		\$0
C - Travel		\$0
D - Equipment		\$0
E - Supplies and Services		\$0
F - Consultants/Contracts		
Local	19 sub-awards to multi-jurisdictional drug-gang task forces,	\$2,098,795
State	1 sub-award to the Washington State Patrol for task force	<u>\$908,292</u>
		\$3,007,087
G - Other (Indirect)		\$0
		<u>\$0</u>
	Total Pass Thru:	<u><u>\$3,007,087</u></u>

Pass Through Budget Summary

Salaries	\$	-
Fringe Benefits	<u>\$</u>	<u>-</u>
Total Personnel & Fringe Benefits	\$	-
Travel	\$	-
Equipment	\$	-
Supplies & Services	\$	-
Consultants/Contracts - Local	\$2,098,795	
- State	<u>\$908,292</u>	
Total Pass Through Contracts:	\$3,007,087	
Other (Indirect)	<u>\$</u>	<u>-</u>
Total Pass Through Budget	\$3,007,087	

Total Budget Summary

by Project Categorization

	Admin	Evaluation	PassThru	Total
Salaries 3.23 FTEs	\$ 148,428	\$ 48,570	\$ -	\$ 196,998
Fringe Benefits	<u>\$ 21,813</u>	<u>\$ 7,289</u>	<u>\$ -</u>	<u>\$ 29,102</u>
Total Personnel & Fringe Benefits	\$ 170,241	\$ 55,859	\$ -	\$ 226,100
Travel	\$ 275	\$ 13,492	\$ -	\$ 13,767
Equipment	\$ -	\$ 3,008	\$ -	\$ 3,008
Supplies & Services	\$ 20,639	\$ 8,383	\$ -	\$ 29,022
Consultants/Contracts	\$ 36,516	\$ 150,000	\$ 3,007,087	\$ 3,193,603
Other (Indirect)	<u>\$ 59,584</u>	<u>\$ 19,551</u>	<u>\$ -</u>	<u>\$ 79,135</u>
Total Budget	\$ 287,255	\$ 250,293	\$ 3,007,087	\$ 3,544,635
	8.10%	7.06%	84.83%	100.00%

by Local/State Benefit Categorization

	Admin	Evaluation	PassThru	Total	Budgeted Distribution	Required Distribution
Local Benefit	\$ 207,156	\$ 250,293	\$ 2,098,795	\$ 2,556,244	72.12%	62.80%
State Benefit	<u>\$ 80,099</u>	<u>\$ -</u>	<u>\$ 908,292</u>	<u>\$ 988,391</u>	27.88%	37.20%
Total Budget	\$ 287,255	\$ 250,293	\$ 3,007,087	\$ 3,544,635	100.00%	100.00%

Note: Under the 10% Budget Shift Rule the SAA reserves the right to shift funding from Administration and Evaluation to Pass Through (Local Use Only), If exercised this will increase the percentage of 'Local Benefit' funding and decrease the percentage of 'State Benefit' categorization.

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REVIEW NARRATIVE

Legislative Review:

This application for funding was provided to the chair and minority leaders of both the Washington State Legislature's Senate Ways & Means Committee and the House Appropriations Committee on May 21, 2015. Should any comment or direction be provided prior to June 21st an amended application will be submitted to the Bureau of Justice Assistance.

Public Review:

Program selection and funding distribution was recommended by the Justice Assistance Grant Advisory Committee on January 7, 2015.

The committee represents the primary criminal justice interest groups including law enforcement, prosecution, courts, corrections, prevention, victims, cities, counties, and the state. Furthermore, the majority of the committee, which is comprised of senior representatives of their respective interest groups, routinely solicits input from and briefs their peers on the usage of the Justice Assistance Grant.

Additionally, the abstract, program narrative, and budget and budget narrative was made available for public review on the Washington State Department of Commerce's (the State Administering Agency's) web site on May 18, 2015.

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DISCLOSURE OF PENDING APPLICATIONS

The Washington State Department of Commerce does not have pending applications submitted within the last 12 months for federally-funded assistance that include requests for funding to support the same project being proposed under this solicitation and will cover the identical cost items outlined in the budget narrative and worksheet in the application under this solicitation.

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EVALUATION INDEPENDENCE AND INTEGRITY

There are five primary components of the state's evaluation program, which are performed or coordinated by two individuals. They are:

Coordinated by Program Evaluator
Hired through the State Patrol

- Peer Review Evaluation
- Peer Review Follow-Ups
- Self-Assessments

Performed by Department of Commerce's
Program Manager

- Administrative/Compliance Monitoring
- Report & Application Analysis

The Program Evaluator is contracted for, and hired through the Washington State Patrol. The rationale for this is that the individual must be fully cognizant of the challenges faced by law enforcement, and must be able and trusted to review local case and investigative files without prior redaction of key data – this is not a function that Department of Commerce personnel can generically perform. The Department of Commerce declined to participate in the Washington State Patrol's selection process other than providing input into the job description and performance expectations. The Washington State Patrol conducted public application solicitation and competitive selection of qualified applicants.

Though the evaluator is personally acquainted with practically every task force supervisor and coordinator, as well as many of the members of the task forces' executive boards, the structure of the work precludes a conflict of interest in several ways. The Peer Review Team's members each complete several functional area checklists, which they in turn brief to the entire team. The evaluator after completion of the last team meeting briefs representatives of the task force's executive board in the presence of most if not all of the peer review team members, so change of the team's conclusions would be immediately obvious. The same control affects the written reports - as the executive board has already been briefed on the team's conclusions changes of the issues requiring written response would again be obvious.

The Department of Commerce's Program Manager participates in all of the Peer Review Teams, and in addition to reviewing certain functions of the task force, participates in all team briefings and discussions of its observations, recommendations and findings. Though the program manager does not record case specifics he does note the category and severity of each significant comment and tracks the evaluator's briefing to the executive board with that information in front of him. Furthermore actually labelling any issue a finding (requiring written response) is the call of the program manager, which serves as another check on the evaluator who delivers the team's observations.

The Program Manager is also limited by a number of factors. First he is subject to state law which prohibits subsequent employment by parties over which he exercised contractual or fiscal authority.

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The second is that every evaluation function he performs is based upon the data/performance of the contractor which is known, and in many cases prepared by, the contractor. Analysis of individual task force performance data, raw data as well as the analysis results, is provided to the task forces several times during the year and is open to public review at any time.

The program manager also walks his supervisor through the preparation of randomly selected samples of each report generated, and through all the data supporting any adverse decision. (Adverse decisions include monitoring and peer review findings, imposition of special conditions, shift of a contractor to a reduced funding group, or withholding or termination of funding).

The program manager's supervisor also approves the administrative compliance monitoring plan for each year, as well as significant deviation from that plan.

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INDIRECT

STATE AND LOCAL GOVERNMENTS RATE AGREEMENT

ORGANIZATION

Date: November 24, 2014

DUNNS Number: 808-88-2302
Washington State Department of Commerce
1011 Plum Street SE
P.O. Box 42525
Olympia, WA 98504-2525

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government to which OMB Circular No. A-87 applies, subject to the conditions in Section III.

SECTION 1: INDIRECT COST RATES

RATE TYPE: FIXED FINAL PROV. (PROVISTIONAL) PRED (PREDETERMINED)

TYPE	EFFECTIVE PERIOD		RATE (%) *	LOCATION	APPLICABLE TO
	FROM	TO			
FINAL	07/01/2009	06/30/2010	38.3	All	All Programs
FINAL	07/01/2010	06/30/2011	35.0	All	All Programs
FINAL	07/01/2011	06/30/2012	35.0	All	All Programs
FINAL	07/01/2012	06/30/2013	31.8	All	All Programs
FINAL	07/01/2013	06/30/2014	33.8	All	All Programs
PROV.	07/01/2014	06/30/2015	35.0	All	All Programs
PROV.	07/01/2015	06/30/2016	35.0	All	All Programs

***BASE**

Direct salaries and wages including all fringe benefits.

SECTION II: SPECIAL REMARKS

TREATMENT OF FRINGE BENEFITS:

Fringe benefits are specifically identified to each employee and are charged individually as direct costs. The directly claimed fringe benefits are listed below.

TREATMENT OF PAID ABSENCES:

Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost of salaries and wages. Separate claims are not made for the cost of these paid absences.

EQUIPMENT DEFINITION

Equipment is defined as tangible nonexpendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

The following Fringe benefits are treated as direct costs:

OLD AGE and SURVIVORS INSURANCE (OASI), MEDICARE, HEALTH/LIFE INSURANCE, DISABILITY INSURANCE, MEDICAL AID & INDUSTRIAL INSURANCE, and RETIREMENT & PENSION.

SECTION III: GENERAL

A. LIMITATIONS:

The rates in this Agreement are subject to any statutory or administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rate(s) is subject to the following conditions: (1) only costs incurred by the organization were included in its indirect cost pool as finally accepted, such costs are legal obligations of the organization and are allowable under the governing cost principles; (2) the same costs that have been treated as indirect costs are not claimed as direct costs; (3) similar types of costs have been accorded consistent accounting treatment; and (4) the information provided by the organization which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

B. ACCOUNTING CHANGES:

This Agreement is based on the accounting system purported by the organization to be in effect during the Agreement period. Changes to the method of accounting for costs which affect the amount of reimbursement resulting from the use of this Agreement require prior approval of the authorized representative of the cognizant agency. Such changes include, but are not limited to,

ORGANIZATION: Washington State Department of Commerce
Agreement Date: 11/24/2014

changes in the charging of a particular type of cost from indirect to direct. Failure to obtain prior approval may result in cost disallowances.

C. FIXED RATES:

If a fixed rate is included in this Agreement, it is based on an estimate of the costs for the period covered by this rate. When the actual costs for this period are determined, an adjustment will be made to a rate of future year(s) to compensate for the difference between costs used to establish the fixed rate and actual costs.

D. USE BY OTHER FEDERAL AGENCIES:

The rates in this Agreement were approved in accordance with the authority in the Office of Management and Budget Circular A-87 Circular, and should be applied to grants, contracts and other agreements covered by this Circular, subject to any limitations in A above. The organization may provide copies of the Agreement to other Federal Agencies to give them early notification of the Agreement.

E. OTHER:

If any Federal contract, grant or other agreement is reimbursing indirect costs by a means other than the approved rate(s) in this Agreement, the organization should (1) credit such costs to the affected programs and (2) apply the approved rate(s) to the appropriate rate(s) to the appropriate base identify the proper amount of indirect costs allocable to these programs.

BY THE INSTITUTION:

ON BEHALF OF THE FEDERAL
GOVERNMENT:

WASHINGTON DEPART OF
COMMERCE

DEPART OF HOUSING AND URBAN
DEVELOPMENT



(Signature)

Per HUD instructions dated April 1, 2011

(Signature)

Connie Robins

(Name)

(Name)

Assistant Director
Administrative Services Division

(Title)

(Title)

November 24, 2014

(Date)

(Date)