CJCC CRIMINAL JUSTICE COORDINATING COUNCIL JUSTICE REINVESTMENT INITIATIVE

LUCAS COUNTY JUSTICE REINVESTMENT INITIATIVE PILOT PROJECT REQUEST FOR PROPOSALS

APPLICATIONS ARE DUE September 18, 2023 AT 4:00 PM No late application will be accepted. Completed Applications Must be Submitted via Email to grants@noris.org

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CJCC CRIMINAL JUSTICE COORDINATING COUNCIL JUSTICE REINVESTMENT INITIATIVE TABLE OF CONTENTS

	Page
JUSTICE REINVESTMENT Initiative (JRI) PILOT GRANT PROGRAM AND CJCC	3
ELIGIBLE APPLICANTS	4
TECHNICAL ASSISTANCE	4
WHAT TO EXPECT	4
AWARD AMOUNT	5
PROGRAM PURPOSE	5
LENGTH OF FUNDING	5
FISCAL CONSIDERATIONS	6
POST AWARD REPORTING REQUIREMENTS	7
JRI DATABASE OVERVIEW	7
JRI PROPOSAL NARRATIVE	8
EXECUTIVE SUMMARY	8
BUDGET REQUIREMENTS	9
BUDGET FORM INSTRUCTIONS	9
PROPOSAL CHECKLIST	14
FORMAT AND SUBMISSION	14
UNALLOWABLE COSTS	15

JUSTICE REINVESTMENT INITIATIVE PILOT GRANT AND CJCC

Justice Reinvestment is a data-driven approach to improve public safety, reduce corrections and related criminal justice spending, and reinvest savings in strategies that can decrease crime and reduce recidivism. The CJCC was awarded a discretionary Justice Reinvestment Initiative grant in 2019 to obtain data on all returning citizens returning to Lucas County from incarceration in the Ohio Department of Rehabilitation and Corrections (ODRC).

CJCC strives to promote and foster cooperation, coordination, and cost-savings between governmental units and agencies, and to improve the criminal justice system through research, analysis, technical assistance, grant development, training, information management, and other services as requested by the governmental agencies served.

Since the award of the 2019 JRI grant, the CJCC through its Northwest Ohio Regional Information System (NORIS) has built a database for community partners to use to gather information on individuals returning to Lucas County from incarceration at ODRC. Through this grant funding, the CJCC has created a Pilot Grant Project (Pilot) to fund a community agency and or agencies to use the database to conduct targeted pre-release in-reach to ODRC institution(s) and then to continue to work with them upon their return to the community.

A central goal of this Pilot is to create reentry release plans for individual's pre-release, then to connect them to needed services post-release using the Going Home to Stay Program as a central hub for services.

The CJCC Reentry Committee and the Reentry Coalition of Northwest Ohio (RCNWO) have worked collaboratively with the Adult Parole Authority (APA) of ODRC and the Toledo Municipal Court (TMC) to create a unique program ("Going Home to Stay" aka First Wednesday) benefiting thousands of returning citizens in Lucas County each year.

On the first Wednesday of every month this event is held at One Government Center (the people's building) from 11am to 1:30pm throughout the first floor. Approximately 150 formerly incarcerated individuals and family members attend the event every month. The event showcases a vast array of service providers, all in one spot, to help individuals overcome barriers to their successful reintegration back into the community. Service providers include the Bureau of Motor Vehicles (BMV), Social Security Administration, Child Support Agency, Jobs and Family Services, Medicaid plan providers, volunteer attorneys, mental health and substance use agencies, employment agencies, employers, unions, educational institutions, faith-based institutions and reentry mentors.

A primary focus of our reentry efforts is to remove or reduce barriers to successful reentry, so that motivated individuals - who have served their time and paid their debt to society - are able to compete for a job, attain stable housing, support their children and their families, and contribute to their communities.

Eligible applicants will need to submit a proposal that uses the JRI/CJCC database to collect information on individuals returning to Lucas County and then begin pre-release services in the ODRC institution for 30 - 60 days and continue to work with them upon their return to the community.

A goal of this project is to show that the database provides needed data to reentry agencies to allow them to do targeted planning prior to release and improves reentry outcomes including reducing recidivism upon return to the community.

ELIGIBLE APPLICANTS

Applicants must have an organization, or subrecipient, that will serve as the fiduciary agent and assume overall responsibility for the grant. Eligible applicants include:

- 1. Local agencies whose work focuses on serving returning citizens
- 2. Agencies must have a current System for Award Management (SAM) registration and be listed as a non-profit by the IRS

If intending to apply for this funding please submit the letter of intent to apply by August 30, 2023. This form is available on the CJCC website with other grant related forms.

TECHNICAL ASSISTANCE

For technical assistance on any part of the Pilot application, please contact Tom Luettke, Reentry Coordinator at 567-200-6815 or <u>tom.luettke@noris.org</u>. In addition, questions may be submitted to <u>grants@noris.org</u>.

WHAT TO EXPECT

CJCC Grants staff and a sub-group of the CJCC Reentry Committee will review Pilot proposals internally. The review process includes:

- 1. Financial and programmatic reporting compliance
- 2. Ensuring project budget costs are related to the program
- 3. An in-depth look at the subject matter discussed in the proposal

The sub-group of the CJCC Reentry Committee will make final funding recommendations.

Selected projects will receive **Award Notification.** Projects must complete and return all required forms. Prior to project start date, subgrantees will receive orientation information including funding conditions and grant management strategies. Payments are made on a reimbursement basis.

All awards will be for 12 months of funding, operating from October 1, 2023 through September 30, 2024.

Forms and assurances included with pre-award conditions include but are not limited to:

- Equal Employment Opportunity Certification Form
- Civil Rights and EEOP Questions Part 1 Form
- Standard Assurances Form

- Special Conditions Form
- Fidelity Insurance/Surety Bond (Note: Only applicable for non-profit applicants)
- Proof of Tax Exempt Status (Note: Only applicable for non-profit applicants)
- Registration in the System for Award Management (<u>www.sam.gov</u>)
- Certification of background checks for those who work with minors.
- Most recent external audit or annual financial review.

In addition to the above requirements and the Request for Proposals, all subrecipients are bound by the <u>Federal Subgrant Conditions Handbook</u>. Project directors are required to attend a mandatory online orientation. Please note: this grant award is a reimbursement grant. Projects will submit Monthly Financial Reports to the CJCC to request reimbursement for grant expenses. Reimbursements are contingent on meeting the requirements of the grant including but not limited to performance reporting requirements as described in the Pre-Award Conditions.

AWARD AMOUNT

The CJCC has \$100,000 to be awarded either to one agency or to be divided among multiple agencies (this will be determined during the CJCC Reentry Grant Committee Review). The award will be in the form of a grant.

PROGRAM PURPOSE

This pilot project will utilize the CJCC ODRC database to target individuals returning to Lucas County and conduct in-reach activities to link participants to resources pre-release. Once released, the funded agency will connect participants to reentry resources at the monthly Going Home to Stay resource event. Midwest Evaluation and Research (MER) will conduct an evaluation of the pilot to determine the effectiveness of using the data in helping individuals to successfully reintegrate back into the community. The selected applicant will be required to provide requested data to MER in order to complete its evaluation. More information on the JRI database is provided on page 7, including how to access the database if your agency has not already been granted access.

LENGTH OF FUNDING

Applicants may apply for 12 months of funding operating from October 1, 2023 to September 30, 2024.

The grant funding will be a one-time only funding opportunity. Midwest Evaluation and Research will conduct a limited evaluation of the effectiveness of this Pilot Project.

This solicitation does not require a match. However, if a successful application proposes a voluntary match amount, and CJCC approved the budget, the total match amount incorporated into the approved budget becomes mandatory and subject to an audit.

Acceptable forms of In-Kind Match include:

- Donations of expendable equipment, supplies, workshop or classroom materials, work space
- Monetary value of donated time contributed by volunteers such as professional, technical, skilled, or unskilled personnel if services are an integral and necessary part of the project

FISCAL CONSIDERATIONS

Unallowable costs for the JRI program are located on pg. 15.

All costs must directly relate to the goals and objectives of the proposed project. CJCC reserves the right to modify project budgets, remove costs deemed to be inappropriate and/or provide partial funding.

Applicants are encouraged to review the OJP guidance on conference approval, planning, and reporting that is available on the OJP web site at <u>Office of Justice Programs: Financial Guide</u>. This guidance sets out the current OJP policy, which requires all funding recipients that propose to hold or sponsor conferences (including meetings, trainings, and other similar events) to minimize costs.

The guidance also sets upper limits on many conference costs, including facility space, audio/visual services, logistical planning services, programmatic planning services, and food and beverages (in the rare cases where food and beverage costs are permitted at all). Prior review and approval of conference costs can take time (see the guidance for specific deadlines), and applicants should consider this when submitting proposals. Applicants should also understand that conference cost limits may change and that they should regularly check the guidance for updates before incurring such costs.

Note on food and beverages: BJA may make exceptions to the general prohibition on using funding for food and beverages, but will do so only in rare cases, such as:

- where food and beverages are not otherwise available (e.g., in extremely remote areas)
- where the size of the event and capacity of nearby food and beverage vendors would make it impractical to not provide food and beverages, and/or
- where a special presentation at a conference requires a plenary address where conference participants have no other time to obtain food and beverages.

Any such exception requires BJA's prior written approval. The restriction on food and beverages does not apply to water provided at no cost, but does apply to any and all other refreshments, regardless of the size or nature of the meeting. Additionally, this restriction does not affect direct payment of per diem amounts to individuals in a travel status under your organization's travel policy.

Costs associated with language assistance (if applicable): If an applicant proposes a program or activity that would deliver services or benefits to individuals, the costs of taking reasonable steps to provide meaningful access to those services or benefits for individuals with limited English proficiency may be allowable. Reasonable steps to provide meaningful access to services or benefits may include interpretation or translation services where appropriate. For additional information, see the "Civil Rights Compliance" section of the OJP "Other Requirements for OJP Applications" web page at Office of Justice Programs: Civil Rights Overview.

The personnel cost category should include all staff salaries for which reimbursement will be requested.

It is important to include any changes that may occur over the course of the funding period including raises or cost of living increases. Fringe benefits may include:

- PERS (government agencies)
- FICA (private agencies)
- Unemployment Compensation
- Defined retirement benefit plan (private agencies)
- Medicare
- Health, dental, and visions insurance
- Life insurance
- Long term and short term disability insurance
- Employee assistance programs
- Paid time off (vacation, sick, compensatory, holiday and personal) accrued and used during the award period.

POST AWARD REPORTING REQUIREMENTS

All CJCC subgrantees are required to complete and submit monthly financial reports and quarterly performance reports. Subgrantees are required to report on any grant-funded activity that occurred during the reporting period. Performance Reports will be submitted to Tom Luettke, Reentry Coordinator quarterly and Financial Reports will be submitted to <u>grants@noris.gov</u> by the 10th of the next month after quarter end.

JRI DATABASE OVERVIEW

The CJCC was awarded the JRI grant in 2019. Since the grant was awarded, the CJCC through its Northwest Ohio Regional Information System (NORIS) has built a database for community partners to use to gather information on individuals returning to Lucas County from incarceration at the Ohio Department of Rehabilitation and Correction (ODRC). The CJCC has a Data Share Memorandum of Understanding with the Ohio Department of Rehabilitation (ODRC) in which a daily data feed is provided to the CJCC on all individuals returning to Lucas County. The recipient(s) of this pilot grant will be required to sign this MOU and the ODRC will be provided a copy of said MOU. Through this grant the CJCC has created a Pilot Grant Project (Pilot) to fund a community agency and or agencies to use the database to conduct targeted pre-release in-reach to ODRC institution(s).

A central goal of this Pilot is to create reentry release plans for individual's pre-release, then to connect them to needed services post-release using the Going Home to Stay Program as a central hub for services.

Once a user is approved for sign-on credentials, they will be provided with a user name and password to access the online platform. The database is robust with data on individuals who have returned to Lucas County going back to the 1950's. Not only does the database have the data that can be found on ODRC's inmate search website, this database contains much more valuable data for reentry providers. ORAS scores are provided and all classes and certificates earned while at ODRC are listed for each individual. In addition, a multitude of search options are available, including searching to see how many individuals are returning to Lucas County in a given timeframe from each institution of ODRC. In addition, there is a data analytics page which can be utilized to graph the data for different timeframes.

In addition, there is a section where reentry notes can be maintained on individuals that the agency has contacted and worked with. Midwest Evaluation and Research (MER) is the research partner on the overall JRI grant and will be writing an evaluation report on the usefulness of the database at the end of the grant, currently scheduled to end on Sept. 30, 2024. A requirement of any pilot grant award will require the successful applicant to work with MER on the evaluation report and provide data.

If your agency does not currently have access to the JRI database please submit the database application form listed on the CJCC website along with other required forms for this grant.

PROGRAM NARRATIVE

The following sections should be included as part of the program narrative:

- a. Statement of the Problem
- b. Project Design and Implementation
- c. Agency Capabilities and Competencies
- d. Plan for Collecting Data Required to assist MER with the Overall Program Evaluation
- e. Project Objectives: The successful applicant will need to meet the following Project Objectives:
 - Utilize the CJCC JRI database to identify individuals returning to Lucas County
 - Develop a pre-release reentry plan for individuals returning to Lucas County
 - Connect all participants to the Going Home to Stay program
 - Work with participants on removing barriers upon their return home

Include in the narrative please address the number of participants your program will work with and how your project will achieve the above objectives.

f. Timeline of Program Activities to Include Staff Responsible to Carry Out Activities.

The proposal will be evaluated on how effectively it:

- Presents a comprehensive, thorough timeline that is well defined and comprehensively specifies what will be done, who (individuals and organizations) will do it, and when it will be accomplished. Include activities such as anticipated collaboration board meetings, CJCC grant reporting deadlines and any other activities specific to the project. The timeline should be reasonable given the nature of the problem, the target population, and the approach/response discussed in earlier sections of the application.
- If applicable, include any other deliverables that will be created and/or used throughout the project.
- The timeline of activities should be detailed, align with the project description and be clearly organized. Activities may be grouped together as daily, weekly, monthly, quarterly, and annually.
- Note in the timeline whether the agency can begin in-reach activities into ODRC immediately upon executing award documents.

EXECUTIVE SUMMARY

The Executive Summary serves as a concise and accurate description of the proposed project and should

Page 8 of 15

not introduce new information. The information provided should serve as a summarized version of the overall application narrative.

Purpose Statement

The purpose statement should be clear and concise. It describes what the applicant is going to do, the population that is going to be served, how it will be accomplished and why it is important. Information provided within the purpose statement is reported to the Federal Funding Accountability and Transparency Act (FFATA) reporting system in response to FFATA legislation.

Problem Statement and Project Description

The applicant must provide a condensed version of the problem statement and project description and ensure activities, dates, data/statistics align with previously presented statement narratives.

Participating Agencies/Collaboration

The applicant must provide a detailed collaboration board list.

BUDGET REQUIREMENTS

Describe any costs associated with implementing the program.

The proposal will be evaluated on how effectively it:

- Presents a clear and detailed budget with a narrative that clearly explains and justifies the budget information.
- Justifies the costs of the proposed program and the costs are considered reasonable in view of the types and range of activities to be conducted, the number of participants to be served, and the expected results and benefits.
- Clearly states how the match funds will be used and the source of the match funds.

BUDGET FORM INSTRUCTIONS

These budget instructions apply to all CJCC grant programs. Please refer to the Request for Proposals (RFP) for program specific instructions including additional allowable/unallowable costs and matching requirements. Applicants must complete the entire budget application and must clearly demonstrate the relationship between their narrative proposal and budget. Budgets are carefully reviewed to ensure that costs directly relate to the project. CJCC reserves the right to modify project budgets.

PART A – BUDGET REQUEST BY RESOURCE

Funds Requested: Represents federal funds requested through the CJCC. Cash Match: Represents actual cash provided to support the match requirement. (Note: Cash Match is not required for this grant) In-kind Match: Represents the in-kind amount to support the project. (In-Kind is not required but if listed, the agency will be required to meet the in-kind match) **Total Project Budget**: This amount should be the total of federal and matching funds. The required matching percentage is based on the total project budget. **Source of Match**: Identify who is providing the match and the source of the funds.

PART B – BUDGET REQUEST BY COST CATEGORY

Please list all project costs, including match costs, in the appropriate category. Justification for each item listed is required in the narrative fields. Costs that are not justified will be denied.

Section 1- Salaries and Personnel

This section is used for implementing agency staff participating on the project for a specific time period. Include staff name, title, average number of hours worked, and hourly rate for the project period in the space provided. Provide a detailed narrative of job duties and responsibilities for each project staff.

State or local government employees may be employed by a subgrantee and implementing agency in addition to their full-time jobs, if the work is performed on their own time and:

- The compensation is reasonable and consistent with that paid for similar work in other activities of state or local government;
- The arrangement is approved and proper under state or local regulations, and
- The time and/or services provided are supported by adequate documentation.

Overtime premiums can only be requested if the position is paid from these grant funds for regular time. The overtime costs must be prorated among jobs and not charged solely to the subgrant.

- To avoid problems from overtime, holiday pay, night differential or payroll regulations, employment arrangements should be made by the subgrantee/implementing agency directly with the individual unless there has been a transfer or loan of the employee for which regular and overtime services provided are to be charged to or reimbursed by the subgrantee. Overtime and night differentials are allowed only if their payment adheres to state or local government policies and has prior CJCC approval.
- Payment of these premiums will be for work performed by subgrant employees in excess of the established workweek.
- Unemployment Compensation may be charged if you are a contributing employer.

Employer's Share of Fringe Benefits

All fringe benefit percentages are based on personnel expense amounts. Only the fringe benefits listed on the budget pages are allowable. Projects that include fringe benefits usually have provisions for a certain percentage of fringes based on allowable salary costs, or costs that have documentation and are incurred according to subgrant provisions. Only the percentage or amount stated in the subgrant will be allowed, regardless of actual costs.

Worker's Compensation costs are usually paid each spring for hours worked the previous year, at an agency's assigned rate. Since you will not have any actual bills to pay during the subgrant period, you may charge projected Worker's Compensation to the subgrant either quarterly, or in a single

charge in the fourth quarter by multiplying direct wages with your most recent rate paid in the current year.

Section 2 - Consultants/Contracts

Consultant contracts and other contractual agreements should state the services to be performed and all reimbursements. Reimbursements may include salary, travel, meals, lodging, supplies and equipment, and airfare. Compensation for these services should be reasonable and consistent with similar services in the market place. The maximum rate for consultants cannot exceed \$450 for an eight-hour day, excluding travel and subsistence costs. An eight-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance. Attach a scope of services and resume for any identified consultants.

Consultant contracts or other written agreements do not affect a subgrantee's responsibility for grant guideline compliance. Federal regulations mandate that all procurement transactions, whether negotiated or competitively bid, will be conducted in a manner that provides maximum open and free competition. Agencies must also observe their own competitive bidding guidelines when procuring consultant, contractual, or purchased personnel services.

Compensation for Various Consultant Classifications Includes:

Educational Institution: Maximum compensation is the consultant's academic salary projected for 12 months, divided by 260.

State & Local Government: Maximum not to exceed daily salary, and allowable only when government will not provide their services at no cost.

Not-for-Profit: Maximum compensation: In cases where an individual has authority to consult without employer involvement, compensation should not exceed the individual's daily salary rate paid by employer, subject to the \$650 maximum/8-hr day. NOTE: If individual works/consults less than 8 hours in a day, they will be compensated at the \$81.25 hourly rate for the amount of hours they work/consult on that day.

Commercial Nonprofit: Subject to competitive bidding procedures, and outside of the \$81.25/hour max (up to \$650/8-hr day).

Independent: Reasonable and consistent with similar services in the market place. The rate may include fringe benefits.

Section 3 - Travel

CJCC allows reasonable charges for necessary travel costs related to official project business. Normal charges include hotel, meals, airfare, ground transportation, and mileage at the agency policy rate, not to exceed the current federal rate. Provide a detailed narrative on the estimated travel and how it relates to project activities. Registration fees for travel should be included in "Other Costs." Detail any consultant travel under the Consultants/Contracts Section. The subgrantee/implementing agency may follow their own travel rates for domestic travel. For those agencies without an established travel policy, the federal travel policy will apply. Only travel costs within the United States, its territories, and Canada are allowed.

Section 4 - Equipment

Equipment purchases are allowable when necessary to achieve project goals and objectives, and must be purchased in the **first six months** of the project period. Basic law enforcement equipment including uniforms, firearms, and police vehicles, including vans, motorcycles or aircraft will not be funded.

Equipment is any item purchased for the subgrant whose useful value or "life" extends beyond the subgrant period. Smaller office items such as calculators, recorders, and cameras are considered equipment. Expendable items that are "used up" are considered supplies.

Section 5 - Supplies

Supply costs in a subgrant are usually very small and based on estimates. Typical supplies include paper, pens, ink cartridges, postage and disks. General office supplies, such as paper and pens, can be grouped together and assigned a group cost. List other supply costs individually.

Section 6 - Other Costs

Rent: The rental cost of space in a privately owned building is allowable and is limited to the amount stated in a written lease agreement. Rent cannot be paid if the building is owned by the subgrantee or if the subgrantee has substantial financial interest in the property. Cost must be prorated if the facility is supported with other funding sources, regardless of the actual rental cost.

Cost of Ownership: Charges must reflect actual cost (including depreciation based on the useful life of the building, operation and maintenance, and other allowable costs).

Telephone: Phone bills may be allocated between one or more programs. Clearly show the method used to charge phone services to the project, whether by staff time charged to the project, actual calls made, or a combination of both.

Utilities: Utility costs may be allocated between one or more programs. Use the same guidelines used for telephone charges for utility costs not included in the rental or lease agreement.

Bookkeeping, Clerical: For temporary help only. Maintain payroll records to reflect the person's name, hours worked, and services provided.

Maintenance: The cost of insurance, security, janitorial services, elevator service, and upkeep of grounds, normal repairs and alterations are allowable if not otherwise included in rent or other space costs.

Audit: This item is allowable for non-federal subgrantees expending \$750,000 or more in federal funds (from all sources including pass-through subawards) in a 12-month reporting period.

Auto Lease: Auto lease payments are allowable, with subsequent documentation such as the lease agreement, invoices or canceled checks.

Equipment Lease: Leasing a copier, fax machine, etc., is an allowable cost with subsequent documentation such as the lease agreement, invoices or canceled checks.

Printing: The cost of printing brochures, flyers, publications, etc., is allowable provided the appropriate acknowledgement and responsibility language is included in the printed material.

Section 8 - Indirect Costs

Indirect costs are allowed only if the applicant has a federally approved indirect cost plan. Allowable indirect costs will be capped at a rate not to exceed 10%. Attach a copy of your certified indirect cost plan to the application.

PART B – BUDGET REQUEST BY RESOURCE & COST CATEGORY

This page provides a project cost synopsis by category. To determine these totals, list costs by category from the Part B, Sections 1-8, and then add the column down. The totals in line 9, Total Project Budget, should match the figures reported in Part A.

Projects may share costs between two or more programs if their budgets show how costs will be allocated, and the costs are calculated on a reasonable basis. A reasonable basis will vary according to the type of expenditure. Examples: Photocopying charges may be allocated either on the number of actual copies divided by the monthly charge, or on a percentage basis (33% of staff work on subgrant, so 33% of copies are charged to the subgrant). Rent might be charged based on the amount of floor space one-project uses, or on an approximate percentage.

PROPOSAL CHECKLIST

Use the following as a checklist to ensure all required components are addressed. Read the entire **Pilot Project RFP** before completing and submitting proposals to CJCC.

Proposal Narrative Components:

- □ Statement of the Problem
- Project Design and Implementation
- □ Agency Capabilities and Competencies
- Plan for Collecting Data Required to Assist MER with the Overall Program Evaluation
- Project Objectives
- □ Timeline/Activities
- Detailed Budget Form available on CJCC website

Additional Required Forms:

- □ Title Page available on CJCC website
- Executive Summary available on CJCC website
- □ FFTA Form available on CJCC website

FORMAT AND SUBMISSION¹

Proposals may not exceed 12 pages. Proposals should be single-sided pages, 12-point font, double-spaced, with one-inch margins. Required forms, including budget pages, do not count as part of the 12-page total.

<u>Submit One PDF via Email</u>: Each applicant must submit their proposal (including all required signatures and components listed above) as **one** PDF document to <u>grants@noris.org</u>.

DEADLINE: Proposals must be received via email to the grants @noris.org by <u>4:00 p.m. on</u> <u>September 18, 2023.</u>

PLEASE NOTE: Late applications will not be considered for funding.

¹ For technical assistance please refer to page 4

UNALLOWABLE COSTS

JRI funds may not be used directly or indirectly to provide for any of the following matters:

- Bar Charges/Alcoholic Beverages
- Bonuses or Commissions
- Compensation of Federal Employees
- Construction Projects (other than penal or correctional institutions)
- Corporate Formation/Startup Costs
- Costs Incurred Outside the Project Period
- Credit Card Fees
- Entertainment Costs
- Fines and Penalties
- Food and Beverages*
- Fundraising
- Land Acquisition
- Lobbying
- Luxury items
- Membership Fees to organizations whose primary activity is lobbying
- Military-Type Equipment
- Passport Charges
- Real Estate
- State and Local Sales Taxes
- Tips
- Travel of Federal Employees of the Awarding Agency

*No funding can be used to purchase food and/or beverages for any meeting, conference, training, or other event. Exceptions to this restriction may be made only in cases where such sustenance is not otherwise available (i.e., extremely remote areas), or where a special presentation at a conference requires a plenary address where there is no other time for sustenance to be attained. Such an exception would require prior approval. This restriction does not apply to water provided at no cost, but does apply to any and all other refreshments, regardless of the size or nature of the meeting. Additionally, this restriction does not impact direct payment of per diem amounts to individuals in a travel status under your organization's travel policy.