

**Date:** December 2, 2014

**To:** Honorable Chairwoman Rebeca Sosa  
and Members, Board of County Commissioners

Agenda Item No. 3(B)(4)

**From:** Carlos A. Gimenez  
Mayor

**Subject:** Resolution Ratifying the County Mayor or County Mayor's Designee Action in  
Applying for, Receiving and Expending Funds from the United States Department of  
Justice, Office for Victims of Crime

Resolution No. R-1031-14

**RECOMMENDATION**

It is recommended that the Board of County Commissioners ("Board") ratify the County Mayor or the County Mayor's designee action of applying for, receiving and expending funds from the United States Department of Justice, Office for Victims of Crime (OVC) FY 2014 Services for Victims of Human Trafficking on behalf of Miami-Dade County. It is further recommended that the Board authorize the County Mayor or the County Mayor's Designee to apply for, receive and expend additional future funds should they become available under this program for the purpose outlined herein. Finally, it is recommended that the Board authorize the County Mayor or the County Mayor's designee to execute such contracts and agreements as are required by the Lead Agency, Miami-Dade County and/or by the funder; the United States Department of Justice, following approval for form and legal sufficiency by the County Attorney's Office; and to file and execute any necessary amendments to agreements for and on behalf of Miami-Dade County. The grant term is October 1, 2014 through September 30, 2016. On September 16, 2014, the award letter was received (Attachment A). The Cooperative Agreement was executed on October 28, 2014 (Attachment B).

**SCOPE**

These funds will allow Miami-Dade County through its Community Action and Human Services Department ("the Department"), to provide programmatic and fiscal management and supervision to the project to ensure goal attainment and compliance with the DOJ-OVC grant agreement. This will be accomplished through the hiring of two (2) full-time Victims of Crime Specialists who will assist victims of human trafficking with the provision and coordination of advocacy activities; one of these two positions would be working at the Community Action and Human Services Department and the other at the Miami Dade Police Department. In this role, the Victims of Crime Specialists would work with community human trafficking service providers to secure coordinated services for their clients. The Victims of Crime Specialists would actively participate in the Miami-Dade County Human Trafficking Coalition and other human trafficking task forces and working groups in the community. Furthermore, the Victims of Crimes Specialists will also assist in the development of appropriate protocols. Miami-Dade County will subcontract with Americans for Immigrant Justice for the provision of immigration legal services, Dade Legal Aid for legal family and civil services, University of Miami for the research component of this grant, and the Trauma Resolution Center for mental health and trauma informed counseling.

**FISCAL IMPACT/FUNDING SOURCE**

There is no fiscal impact to the County for the administration of these services. The Awarded Funds from the United States Department of Justice, Office for Victims of Crimes FY 2014 Services for Victims of Human Trafficking grant program will be contributing \$400,000 to the County.

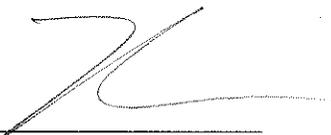
**TRACK RECORD/MONITOR**

The Department has provided services to victims of human trafficking for the past two (2) years. The Violence Prevention and Intervention Division is a service component which provides a variety of services to human trafficking victims who are fleeing the abuse. Ivon Mesa, Violence Prevention and Intervention Division Director, will provide administrative oversight and monitor this grant and the services provided.

**BACKGROUND**

The Department is seeking funds to continue serving human trafficking victims who are in need of coordinated services and resources in order to flee the abuse they face. The Americans for Immigrant Justice, the Dade Legal Aid, the Trauma Resolution Center and the University of Miami will be subcontracted to provide coordinated community response, advocacy and legal services to this population. The aforementioned partners in this grant have a long history of collaboration with the Department and have been onsite partners at the Coordinated Victims Assistance Center since its inception. Eligible program participants will receive preliminary assessments to determine needs and will then be linked to the appropriate onsite services in order to achieve individualized goals. The program will continue to serve as part of the continuum of services under the Department. Client services will include an array of advocacy and legal services such as, but not limited to, individualized/group counseling, family and civil legal assistance, immigration legal assistance, among others.

The anticipated award is \$400,000 and it is slated for the provision of direct services. These funds will be used to enhance services at the Coordinated Victims Assistance Center where victims of human trafficking seek the help that they need.



Russell Benford  
Deputy Mayor



**MEMORANDUM**  
(Revised)

**TO:** Honorable Chairwoman Rebeca Sosa  
and Members, Board of County Commissioners

**DATE:** December 2, 2014

**FROM:** R. A. Cuevas, Jr.  
County Attorney

**SUBJECT:** Agenda Item No. 3(B)(4)

Please note any items checked.

- "3-Day Rule" for committees applicable if raised
- 6 weeks required between first reading and public hearing
- 4 weeks notification to municipal officials required prior to public hearing
- Decreases revenues or increases expenditures without balancing budget
- Budget required
- Statement of fiscal impact required
- Ordinance creating a new board requires detailed County Mayor's report for public hearing
- No committee review
- Applicable legislation requires more than a majority vote (i.e., 2/3's \_\_\_\_, 3/5's \_\_\_\_, unanimous \_\_\_\_ ) to approve
- Current information regarding funding source, index code and available balance, and available capacity (if debt is contemplated) required

Approved \_\_\_\_\_ Mayor

Agenda Item No. 3(B)(4)

Veto \_\_\_\_\_

12-2-14

Override \_\_\_\_\_

RESOLUTION NO R-1031-14

RESOLUTION RATIFYING THE COUNTY MAYOR OR COUNTY MAYOR'S DESIGNEE'S ACTION IN APPLYING FOR FUNDS FROM THE UNITED STATES DEPARTMENT OF JUSTICE, OFFICE OF VICTIMS OF CRIME, IN THE APPROXIMATE AMOUNT OF \$400,000.00 TO PROVIDE COORDINATED ADVOCACY AND LEGAL SERVICES TO VICTIMS OF HUMAN TRAFFICKING, FOR THE MIAMI-DADE COUNTY COMMUNITY ACTION AND HUMAN SERVICES DEPARTMENT IN COLLABORATION WITH AMERICANS FOR IMMIGRANT JUSTICE, DADE LEGAL AID, THE TRAUMA RESOLUTION CENTER, AND THE UNIVERSITY OF MIAMI; AUTHORIZING THE COUNTY MAYOR OR COUNTY MAYOR'S DESIGNEE TO APPLY FOR, RECEIVE, AND EXPEND SUCH FUNDS AND ADDITIONAL FUNDS THAT MAY BECOME AVAILABLE UNDER THIS PROGRAM FOR THIS PURPOSE; AND AUTHORIZING THE COUNTY MAYOR OR COUNTY MAYOR'S DESIGNEE TO EXECUTE GRANT AWARDS AND AGREEMENTS AVAILABLE UNDER THIS PROGRAM FOR THIS PURPOSE

WHEREAS, this Board desires to accomplish the purposes outlined in the accompanying memorandum, a copy of which is incorporated herein by reference,

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF MIAMI-DADE COUNTY, FLORIDA, that this Board ratifies the County Mayor or the County Mayor's Designee's action in applying for the United States Department of Justice, Office for Victims of Crime, FY 2014 Services for Victims of Human Trafficking grant program in the approximate amount of \$400,000 for the Miami-Dade County Community Action and Human Services Department in collaboration with Americans for Immigrant Justice, Dade Legal Aid, Trauma Resolution Center and the University of Miami; and authorizes the County Mayor or the County Mayor's Designee to receive and expend these funds, authorizes the County Mayor or the County Mayor's

Designee to apply for, receive and expend additional future funds should they become available under this program, pursuant to this application, for the purpose outlined herein; and authorizes the County Mayor or the County Mayor's Designee to execute grant awards and agreements subject to the approval of the County Attorney's Office.

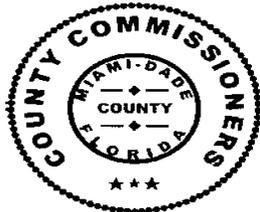
The foregoing resolution was offered by Commissioner **Sally A. Heyman**, who moved its adoption. The motion was seconded by Commissioner **Rebeca Sosa** and upon being put to a vote, the vote was as follows:

		Rebeca Sosa, Chairwoman	<b>aye</b>
Bruno A. Barreiro	<b>aye</b>	Esteban L. Bovo, Jr.	<b>aye</b>
Daniella Levine Cava	<b>aye</b>	Jose "Pepe" Diaz	<b>aye</b>
Audrey M. Edmonson	<b>aye</b>	Sally A. Heyman	<b>aye</b>
Barbara J. Jordan	<b>aye</b>	Jean Monestime	<b>aye</b>
Dennis C. Moss	<b>absent</b>	Sen. Javier D. Souto	<b>absent</b>
Xavier L. Suarez	<b>aye</b>	Juan C. Zapata	<b>aye</b>

The Chairperson thereupon declared the resolution duly passed and adopted this 2nd day of December, 2014. This resolution shall become effective ten (10) days after the date of its adoption unless vetoed by the Mayor, and if vetoed, shall become effective only upon an override by this Board.

MIAMI-DADE COUNTY, FLORIDA  
BY ITS BOARD OF  
COUNTY COMMISSIONERS

HARVEY RUVIN, CLERK



By: **Christopher Agrippa**  
Deputy Clerk

Approved by County Attorney as to form and legal sufficiency.

Shanika A. Graves



Department of Justice  
Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

September 16, 2014

The Honorable Carlos A. Gimenez  
Miami-Dade County  
111 NW 1st Street  
Miami, FL 33128

Dear Mayor Gimenez:

On behalf of Attorney General Eric Holder, it is my pleasure to inform you that the Office of Justice Programs has approved your application for funding under the FY 14 Services for Victims of Human Trafficking in the amount of \$400,000 for Miami-Dade County. This award is made under a program entitled "FY 2014 Services for Victims of Human Trafficking Program." The money for this cooperative agreement was authorized by the Trafficking Victims Protection Act of 2000, as amended. This cooperative agreement reflects the continuing commitment of the Department of Justice to enhance the social service field's response to victims of human trafficking.

Enclosed you will find the Grant Award and Special Conditions documents. This award is subject to all administrative and financial requirements, including the timely submission of all financial and programmatic reports, resolution of all interim audit findings, and the maintenance of a minimum level of cash-on-hand. Should you not adhere to these requirements, you will be in violation of the terms of this agreement and the award will be subject to termination for cause or other administrative action as appropriate.

If you have questions regarding this award, please contact:

- Program Questions, Mary R. Atlas-Terry, Program Manager at (202) 353-8473; and
- Financial Questions, the Office of the Chief Financial Officer, Customer Service Center (CSC) at (800) 458-0786, or you may contact the CSC at [ask.ojpo@usdoj.gov](mailto:ask.ojpo@usdoj.gov).

Congratulations, and we look forward to working with you.

Sincerely,

A handwritten signature in cursive script that reads "Karol V. Mason".

Karol Virginia Mason  
Assistant Attorney General

Enclosures



## OFFICE FOR CIVIL RIGHTS

Office of Justice Programs  
Department of Justice  
810 7th Street, NW  
Washington, DC 20531

Tel: (202) 307-8690  
TTY: (202) 307-2027  
E-mail: [askOCR@usdoj.gov](mailto:askOCR@usdoj.gov)  
Website: [www.ojp.usdoj.gov/ocr](http://www.ojp.usdoj.gov/ocr)

September 16, 2014

The Honorable Carlos A. Gimenez  
Miami-Dade County  
111 NW 1st Street  
Miami, FL 33128

Dear Mayor Gimenez:

Congratulations on your recent award. In establishing financial assistance programs, Congress linked the receipt of federal funding to compliance with federal civil rights laws. The Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) is responsible for ensuring that recipients of financial assistance from the OJP, the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW) comply with the applicable federal civil rights laws. We at the OCR are available to help you and your organization meet the civil rights requirements that come with DOJ funding.

### Ensuring Access to Federally Assisted Programs

Federal laws that apply to recipients of financial assistance from the DOJ prohibit discrimination on the basis of race, color, national origin, religion, sex, or disability in funded programs or activities, not only in employment but also in the delivery of services or benefits. A federal law also prohibits recipients from discriminating on the basis of age in the delivery of services or benefits.

In March of 2013, President Obama signed the Violence Against Women Reauthorization Act of 2013. The statute amends the Violence Against Women Act of 1994 (VAWA) by including a nondiscrimination grant condition that prohibits discrimination based on actual or perceived race, color, national origin, religion, sex, disability, sexual orientation, or gender identity. The new nondiscrimination grant condition applies to certain programs funded after October 1, 2013. The OCR and the OVW have developed answers to some frequently asked questions about this provision to assist recipients of VAWA funds to understand their obligations. The Frequently Asked Questions are available at <http://ojp.gov/about/ocr/vawafaqs.htm>.

### Enforcing Civil Rights Laws

All recipients of federal financial assistance, regardless of the particular funding source, the amount of the grant award, or the number of employees in the workforce, are subject to prohibitions against unlawful discrimination. Accordingly, the OCR investigates recipients that are the subject of discrimination complaints from both individuals and groups. In addition, based on regulatory criteria, the OCR selects a number of recipients each year for compliance reviews, audits that require recipients to submit data showing that they are providing services equitably to all segments of their service population and that their employment practices meet equal opportunity standards.

### Providing Services to Limited English Proficiency (LEP) Individuals

In accordance with DOJ guidance pertaining to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, recipients of federal financial assistance must take reasonable steps to provide meaningful access to their programs and activities for persons with limited English proficiency (LEP). See U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 Fed. Reg. 41,455 (2002). For more information on the civil rights responsibilities that recipients have in providing language services to LEP individuals, please see the website <http://www.lep.gov>.

### Ensuring Equal Treatment for Faith-Based Organizations

The DOJ regulation, Equal Treatment for Faith-Based Organizations, 28 C.F.R. pt. 38, requires State Administering Agencies (SAAs) to treat faith-based organizations the same as any other applicant or recipient. The regulation prohibits SAAs from making awards or grant administration decisions on the basis of an organization's religious character or affiliation, religious name, or the religious composition of its board of directors.

The regulation also prohibits faith-based organizations from using financial assistance from the DOJ to fund inherently (or explicitly) religious activities. While faith-based organizations can engage in non-funded inherently religious activities, they must hold them separately from the program funded by the DOJ, and recipients cannot compel beneficiaries to participate in them. The Equal Treatment Regulation also makes clear that organizations participating in programs funded by the DOJ are not permitted to discriminate in the provision of services on the basis of a beneficiary's religion. For more information on the regulation, please see the OCR's website at [http://www.ojp.usdoj.gov/about/ocr/equal\\_fbo.htm](http://www.ojp.usdoj.gov/about/ocr/equal_fbo.htm).

SAAs and faith-based organizations should also note that the Omnibus Crime Control and Safe Streets Act (Safe Streets Act) of 1968, as amended, 42 U.S.C. § 3789d(e); the Victims of Crime Act of 1984, as amended, 42 U.S.C. § 10604(e); the Juvenile Justice and Delinquency Prevention Act of 1974, as amended, 42 U.S.C. § 5672(b); and VAWA, Pub. L. No. 113-4, sec. 3(b)(4), 127 Stat. 54, 61-62 (to be codified at 42 U.S.C. § 13925(b)(13)) contain prohibitions against discrimination on the basis of religion in employment. Despite these nondiscrimination provisions, the DOJ has concluded that it may construe the Religious Freedom Restoration Act (RFRA) on a case-by-case basis to permit some faith-based organizations to receive DOJ funds while taking into account religion when hiring staff, even if the statute that authorizes the funding program generally forbids recipients from considering religion in employment decisions. Please consult with the OCR if you have any questions about the regulation or the application of RFRA to the statutes that prohibit discrimination in employment.

### Using Arrest and Conviction Records in Making Employment Decisions

The OCR issued an advisory document for recipients on the proper use of arrest and conviction records in making hiring decisions. See Advisory for Recipients of Financial Assistance from the U.S. Department of Justice on the U.S. Equal Employment Opportunity Commission's Enforcement Guidance: Consideration of Arrest and Conviction Records in Employment Decisions Under Title VII of the Civil Rights Act of 1964 (June 2013), available at [http://www.ojp.usdoj.gov/about/ocr/pdfs/UseofConviction\\_Advisory.pdf](http://www.ojp.usdoj.gov/about/ocr/pdfs/UseofConviction_Advisory.pdf). Recipients should be mindful that the misuse of arrest or conviction records to screen either applicants for employment or employees for retention or promotion may have a disparate impact based on race or national origin, resulting in unlawful employment discrimination. In light of the Advisory, recipients should consult local counsel in reviewing their employment practices. If warranted, recipients should also incorporate an analysis of the use of arrest and conviction records in their Equal Employment Opportunity Plans (EEOPs) (see below).

### Complying with the Safe Streets Act

An organization that is a recipient of financial assistance subject to the nondiscrimination provisions of the Safe Streets Act, must meet two obligations: (1) complying with the federal regulation pertaining to the development of an EEOP (see 28 C.F.R. pt. 42, subpt. B) and (2) submitting to the OCR findings of discrimination (see 28 C.F.R. §§ 42.204(e), 205(c)(5)).

### Meeting the EEOE Requirement

If your organization has less than fifty employees or receives an award of less than \$25,000 or is a nonprofit organization, a medical institution, an educational institution, or an Indian tribe, then it is exempt from the EEOE requirement. To claim the exemption, your organization must complete and submit Section A of the Certification Form, which is available online at <http://www.ojp.usdoj.gov/about/ocr/pdfs/cert.pdf>.

If your organization is a government agency or private business and receives an award of \$25,000 or more, but less than \$500,000, and has fifty or more employees (counting both full- and part-time employees but excluding political appointees), then it has to prepare a Utilization Report (formerly called an EEOE Short Form), but it does not have to submit the report to the OCR for review. Instead, your organization has to maintain the Utilization Report on file and make it available for review on request. In addition, your organization has to complete Section B of the Certification Form and return it to the OCR. The Certification Form is available at <http://www.ojp.usdoj.gov/about/ocr/pdfs/cert.pdf>.

If your organization is a government agency or private business and has received an award for \$500,000 or more and has fifty or more employees (counting both full- and part-time employees but excluding political appointees), then it has to prepare a Utilization Report (formerly called an EEOE Short Form) and submit it to the OCR for review within sixty days from the date of this letter. For assistance in developing a Utilization Report, please consult the OCR's website at <http://www.ojp.usdoj.gov/about/ocr/ecop.htm>. In addition, your organization has to complete Section C of the Certification Form and return it to the OCR. The Certification Form is available at <http://www.ojp.usdoj.gov/about/ocr/pdfs/cert.pdf>.

To comply with the EEOE requirements, you may request technical assistance from an EEOE specialist at the OCR by telephone at (202) 307-0690, by TTY at (202) 307-2027, or by e-mail at [EEOEsubmissions@usdoj.gov](mailto:EEOEsubmissions@usdoj.gov).

### Meeting the Requirement to Submit Findings of Discrimination

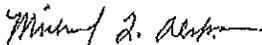
If in the three years prior to the date of the grant award, your organization has received an adverse finding of discrimination based on race, color, national origin, religion, or sex, after a due-process hearing, from a state or federal court or from a state or federal administrative agency, your organization must send a copy of the finding to the OCR.

### Ensuring the Compliance of Subrecipients

SAsAs must have standard assurances to notify subrecipients of their civil rights obligations, written procedures to address discrimination complaints filed against subrecipients, methods to monitor subrecipients' compliance with civil rights requirements, and a program to train subrecipients on applicable civil rights laws. In addition, SAsAs must submit to the OCR every three years written Methods of Administration (MOA) that summarize the policies and procedures that they have implemented to ensure the civil rights compliance of subrecipients. For more information on the MOA requirement, see [http://www.ojp.usdoj.gov/funding/other\\_requirements.htm](http://www.ojp.usdoj.gov/funding/other_requirements.htm).

If the OCR can assist you in any way in fulfilling your organization's civil rights responsibilities as a recipient of federal financial assistance, please contact us.

Sincerely,



Michael L. Alston  
Director

cc: Grant Manager  
Financial Analyst





Department of Justice  
Office of Justice Programs  
Office for Victims of Crime

AWARD CONTINUATION  
SHEET  
Cooperative Agreement

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PROJECT NUMBER 2014-VT-BX-K017

AWARD DATE 09/16/2014

*SPECIAL CONDITIONS*

1. The recipient agrees to comply with the financial and administrative requirements set forth in the current edition of the Office of Justice Programs (OJP) Financial Guide.
2. The recipient acknowledges that failure to submit an acceptable Equal Employment Opportunity Plan (if recipient is required to submit one pursuant to 28 C.F.R. Section 42.302), that is approved by the Office for Civil Rights, is a violation of its Certified Assurances and may result in suspension or termination of funding, until such time as the recipient is in compliance.
3. The recipient agrees to comply with the organizational audit requirements of OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, and further understands and agrees that funds may be withheld, or other related requirements may be imposed, if outstanding audit issues (if any) from OMB Circular A-133 audits (and any other audits of OJP grant funds) are not satisfactorily and promptly addressed, as further described in the current edition of the OJP Financial Guide.
4. Recipient understands and agrees that it cannot use any federal funds, either directly or indirectly, in support of the enactment, repeal, modification or adoption of any law, regulation or policy, at any level of government, without the express prior written approval of OJP.
5. The recipient must promptly refer to the DOJ OIG any credible evidence that a principal, employee, agent, contractor, subgrantee, subcontractor, or other person has either 1) submitted a false claim for grant funds under the False Claims Act; or 2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving grant funds. This condition also applies to any subrecipients. Potential fraud, waste, abuse, or misconduct should be reported to the OIG by -

mail:

Office of the Inspector General  
U.S. Department of Justice  
Investigations Division  
950 Pennsylvania Avenue, N.W.  
Room 4706  
Washington, DC 20530

e-mail: [oig.hotline@usdoj.gov](mailto:oig.hotline@usdoj.gov)

hotline: (contact information in English and Spanish): (800) 869-4499

or hotline fax: (202) 616-9881

Additional information is available from the DOJ OIG website at [www.usdoj.gov/oig](http://www.usdoj.gov/oig).

6. Recipient understands and agrees that it cannot use any federal funds, either directly or indirectly, in support of any contract or subaward to either the Association of Community Organizations for Reform Now (ACORN) or its subsidiaries, without the express prior written approval of OJP.
7. The recipient agrees to comply with any additional requirements that may be imposed during the grant performance period if the agency determines that the recipient is a high-risk grantee. Cf. 28 C.F.R. parts 66, 70.



Department of Justice  
Office of Justice Programs  
Office for Victims of Crime

AWARD CONTINUATION  
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Cooperative Agreement

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PROJECT NUMBER 2014-VT-BX-K017

AWARD DATE 09/16/2014

*SPECIAL CONDITIONS*

8. The recipient agrees to comply with applicable requirements regarding registration with the System for Award Management (SAM) (or with a successor government-wide system officially designated by OMB and OJP). The recipient also agrees to comply with applicable restrictions on subawards to first-tier subrecipients that do not acquire and provide a Data Universal Numbering System (DUNS) number. The details of recipient obligations are posted on the Office of Justice Programs web site at <http://www.ojp.gov/funding/sam.htm> (Award condition: Registration with the System for Award Management and Universal Identifier Requirements), and are incorporated by reference here. This special condition does not apply to an award to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).
9. Pursuant to Executive Order 13513, "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), the Department encourages recipients and sub recipients to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this grant, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.
10. The recipient agrees to comply with all applicable laws, regulations, policies, and guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences, meetings, trainings, and other events, including the provision of food and/or beverages at such events, and costs of attendance at such events. Information on pertinent laws, regulations, policies, and guidance is available in the OJP Financial Guide Conference Cost Chapter.
11. The recipient understands and agrees that any training or training materials developed or delivered with funding provided under this award must adhere to the OJP Training Guiding Principles for Grantees and Subgrantees, available at <http://www.ojp.usdoj.gov/funding/ojptrainingguidingprinciples.htm>.
12. The recipient agrees that if it currently has an open award of federal funds or if it receives an award of federal funds other than this OJP award, and those award funds have been, are being, or are to be used, in whole or in part, for one or more of the identical cost items for which funds are being provided under this OJP award, the recipient will promptly notify, in writing, the grant manager for this OJP award, and, if so requested by OJP, seek a budget-modification or change-of-project-scope grant adjustment notice (GAN) to eliminate any inappropriate duplication of funding.
13. The recipient understands and agrees that award funds may not be used to discriminate against or denigrate the religious or moral beliefs of students who participate in programs for which financial assistance is provided from those funds, or of the parents or legal guardians of such students.
14. The recipient understands and agrees that - (a) No award funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography, and (b) Nothing in subsection (a) limits the use of funds necessary for any Federal, State, tribal, or local law enforcement agency or any other entity carrying out criminal investigations, prosecution, or adjudication activities.
15. The recipient may not obligate, expend or draw down funds until the Office of the Chief Financial Officer (OCFO) has approved the budget and budget narrative and a Grant Adjustment Notice (GAN) has been issued to remove this special condition.
16. The recipient agrees that \$280,000 of this award will be withheld, and that the recipient may not obligate, expend, or drawdown that amount until the recipient submits updated program strategy and budget documents, these have been approved by the Office for Victims of Crime, and a Grant Adjustment Notice (GAN) has been issued to remove this special condition.



Department of Justice  
Office of Justice Programs  
Office for Victims of Crime

AWARD CONTINUATION  
SHEET  
Cooperative Agreement

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PROJECT NUMBER 2014-VT-BX-K017

AWARD DATE 09/16/2014

*SPECIAL CONDITIONS*

17. Recipient certifies that it does not promote, support, or advocate the legalization or practice of prostitution, nor will it use grant funds or program match funds to promote, support, or advocate the legalization or practice of prostitution.
18. The grantee agrees to submit to OVC, within 30 days of award, a revised time-task plan. This revised time-task plan should be developed in consultation with the OVC program specialist assigned to the project, and should clearly indicate the following: (1) each of the stated project objectives and the tasks to be performed to achieve those objectives; (2) the completion dates for tasks and delivery dates for products; (3) the project staff responsible for accomplishing each task; 4) submission dates for financial and programmatic progress reports, consistent with the requirements of the OJP Financial Guide; and 5) incorporation of development schedule for print, video, and multimedia products to assure periodic OVC reviews of products (see Product Submission Requirements).
19. The recipient agrees to submit a final report at the end of this award documenting all relevant project activities during the entire period of support under this award. This report will include detailed information about the project(s) funded, including, but not limited to, information about how the funds were actually used for each purpose area, data to support statements of progress, and data concerning individual results and outcomes of funded projects reflecting project successes and impacts. The final report is due no later than 90 days following the close of this award period or the expiration of any extension periods. This report will be submitted to the Office of Justice Programs, on-line through the Internet at <https://grants.ojp.usdoj.gov/>.
20. The recipient agrees that it will submit quarterly financial status reports to OJP on-line (at <https://grants.ojp.usdoj.gov/>) using the SF 425 Federal Financial Report form (available for viewing at [www.whitehouse.gov/omb/grants/standard\\_forms/ff\\_report.pdf](http://www.whitehouse.gov/omb/grants/standard_forms/ff_report.pdf)), not later than 30 days after the end of each calendar quarter. The final report shall be submitted not later than 90 days following the end of the award period.
21. The recipient shall submit semiannual progress reports. Progress reports shall be submitted within 30 days after the end of the reporting periods, which are June 30 and December 31, for the life of the award. These reports will be submitted to the Office of Justice Programs, on-line through the Internet at <https://grants.ojp.usdoj.gov/>.
22. The grantee agrees to provide summary data to OVC on individual results and outcomes of funded grants in accordance with the Government Performance and Results Act. The data should reflect program/project successes and impact. The grantee organization must provide information in progress and final reports which is consistent with outcomes identified in the solicitation and the grantee's application for funding. The OVC project specialist is available to offer guidance on performance measures to grantees.
23. The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project.
24. The recipient agrees to comply with applicable requirements to report first-tier subawards of \$25,000 or more and, in certain circumstances, to report the names and total compensation of the five most highly compensated executives of the recipient and first-tier subrecipients of award funds. Such data will be submitted to the FFATA Subaward Reporting System (FSRS). The details of recipient obligations, which derive from the Federal Funding Accountability and Transparency Act of 2006 (FFATA), are posted on the Office of Justice Programs web site at <http://www.ojp.gov/funding/ffata.htm> (Award condition: Reporting Subawards and Executive Compensation), and are incorporated by reference here. This condition, and its reporting requirement, does not apply to grant awards made to an individual who received the award as a natural person (i.e., unrelated to any business or non-profit organization that he or she may own or operate in his or her name).



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25. Within 45 calendar days after the end of any conference, meeting, retreat, seminar, symposium, training activity, or similar event funded under this award, and the total cost of which exceeds \$20,000 in award funds, the recipient must provide the program manager with the following information and itemized costs:

- 1) name of event;
- 2) event dates;
- 3) location of event;
- 4) number of federal attendees;
- 5) number of non-federal attendees;
- 6) costs of event space, including rooms for break-out sessions;
- 7) costs of audio visual services;
- 8) other equipment costs (e.g., computer fees, telephone fees);
- 9) costs of printing and distribution;
- 10) costs of meals provided during the event;
- 11) costs of refreshments provided during the event;
- 12) costs of event planner;
- 13) costs of event facilitators; and
- 14) any other costs associated with the event.

The recipient must also itemize and report any of the following attendee (including participants, presenters, speakers) costs that are paid or reimbursed with cooperative agreement funds:

- 1) meals and incidental expenses (M&IE portion of per diem);
- 2) lodging;
- 3) transportation to/from event location (e.g., common carrier, Privately Owned Vehicle (POV)); and,
- 4) local transportation (e.g., rental car, POV) at event location.

Note that if any item is paid for with registration fees, or any other non-award funding, then that portion of the expense does not need to be reported.

Further instructions regarding the submission of this data, and how to determine costs, are available in the OJP Financial Guide Conference Cost Chapter.



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26. Responsibility for the coordination of topics addressed or services rendered is shared jointly with the OVC and the recipient. Where appropriate, the recipient will act jointly with OVC in accomplishing the following tasks: 1) determination of modifications to the program plan or budget; and, 2) design of data collection instruments. In executing this responsibility, OVC requires that its program specialist meet periodically with recipient (as determined by OVC) throughout the life of the project to discuss project activities, plans, problems, and solutions.
27. Responsibility for the day-to-day conduct of the project rests with the recipient. This specifically includes operations, data collection, analysis and interpretation.
28. Responsibility for general oversight and redirection of the project, if necessary, rests with OVC. OVC will review and approve all activities in the requirements under the various stages, as enumerated in the solicitation. This includes review and approval in a timely manner of all key personnel selections, consultants, assessments, plans, instruments, manuals, and documents developed or identified for use during the project, with suggestions for modifications. The program solicitation is hereby incorporated by reference into the Cooperative Agreement making it part of the overall agreement, requiring adherence to its overall design.
29. The recipient authorizes the Office for Victims of Crime (OVC) and/or the Office of the Chief Financial Officer (OCFO), and its representatives, access to and the right to examine all records, books, papers, or documents related to this grant.
30. The Project Director and key program personnel designated in the application shall be replaced only for compelling reasons. Successors to key personnel must be approved, and such approval is contingent upon submission of appropriate information, including, but not limited to, a resume. OJP will not unreasonably withhold approval. Changes in other program personnel require only notification to OJP and submission of resumes, unless otherwise designated in the award document.
31. Approval of this award does not indicate approval of any consultant rate in excess of \$650 per day. A detailed justification must be submitted to and approved by the Office of Justice Programs (OJP) program office prior to obligation or expenditure of such funds.
32. With respect to this award, federal funds may not be used to pay cash compensation (salary plus bonuses) to any employee of the award recipient at a rate that exceeds 110% of the maximum annual salary payable to a member of the federal government's Senior Executive Service (SES) at an agency with a Certified SES Performance Appraisal System for that year. (An award recipient may compensate an employee at a higher rate, provided the amount in excess of this compensation limitation is paid with non-federal funds.)  
  
This limitation on compensation rates allowable under this award may be waived on an individual basis at the discretion of the OJP official indicated in the program announcement under which this award is made.
33. Applicants must certify that Limited English Proficiency persons have meaningful access to the services under this program(s). National origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI and the Safe Streets Act, recipients are required to take reasonable steps to ensure that LEP persons have meaningful access to their programs. Meaningful access may entail providing language assistance services, including oral and written translation when necessary. The U.S. Department of Justice has issued guidance for grantees to help them comply with Title VI requirements. The guidance document can be accessed on the Internet at [www.lep.gov](http://www.lep.gov).
34. The recipient agrees that federal funds under this award will be used to supplement but not supplant state or local government funds.



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*SPECIAL CONDITIONS*

35. Grantee agrees to comply with the requirements of 28 C.F.R. Part 46 and all Office of Justice Programs policies and procedures regarding the protection of human research subjects, including obtainment of Institutional Review Board approval, if appropriate, and subject informed consent.
36. Within 90 days of the date of award, the grantee will submit to the Office for Victims of Crime for review and approval its policies and procedures that it has established to maintain the confidentiality of victims' names, addresses, telephone numbers, or any other identifying information, and its policies and procedures relating to information sharing between partners. In addition, the grantee must submit a signed, written certification that data privacy and sharing protocols comport with the confidentiality and privacy rights and obligations of federal law or the grantee jurisdiction's laws, court rules, or rules of professional conduct applicable to the work performed by the grantee.
37. Grantee agrees to comply with all confidentiality requirements of 42 U.S.C. section 3789g and 28 C.F.R. Part 22 that are applicable to collection, use, and revelation of data or information. Grantee further agrees, as a condition of grant approval, to submit a Privacy Certificate that is in accord with requirements of 28 C.F.R. Part 22 and, in particular, section 22.23.
38. The grantee agrees to notify the State VOCA Assistance and Compensation program administrators and appropriate United States Attorneys' Victim-Witness Coordinators of all training events that will be held in their states as a result of this grant. Notification will include information regarding the content, location, and scheduled time. The state VOCA contacts can be found at <http://www.ojp.usdoj.gov/ovc/help/links.htm>
39. The grantee agrees to submit any print or electronic promotional materials concerning any OVC-funded project that are intended for public dissemination to OVC for review seven (7) working days in advance of release. This includes, but is not limited to: fact sheets, newsletters, press releases, Web-based materials, and listserve announcements.
40. The grantee agrees to submit the final draft of any publication, product, or electronic information at least 120 days before the end date of the grant for OVC review. The grantee agrees to use grant funds to make any substantive corrections, if appropriate, to a publication or product in response to comments generated through either the OVC peer review process or the internal Department of Justice review process. Any grant-funded products (written, Web-based, audio-visual, or any other media format), whether produced at the grantee's or government's expense, shall contain the following statement: This \_\_\_\_\_ was produced by \_\_\_\_\_ under [add contract or grant number, as appropriate], awarded by the Office for Victims of Crime, Office of Justice Programs, U.S. Department of Justice. The opinions, findings, and conclusions or recommendations expressed in this \_\_\_\_\_ are those of the contributors and do not necessarily represent the official position or policies of the U.S. Department of Justice.
41. The grantee agrees that all products developed with or supported by an OVC grant will be sold at a price no higher than actual reproduction and distribution costs.
42. The grantee agrees to comply with the requirements set forth in the current edition of the OVC Publishing Guidelines Handbook at <http://www.ojp.usdoj.gov/ovc/publications/infores/pubguidelines/welcome.html>.
43. Publication of information collected under any evaluation efforts funded in whole or in part by this cooperative agreement (during the term of this cooperative agreement) is subject to advance review and approval by OVC. The grantee must provide a draft copy of the proposed publication to OVC 60 days in advance of the submission of the document to the publishing entity. The grantee must include this provision in all contracts, sub-grants or other funding vehicles utilized to support program evaluation funded by this cooperative agreement.



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44. The grantee agrees that OVC retains the right to make a final determination whether to publish or produce any grant-funded product as an OVC-sponsored product. Only after OVC decides against official publication, can the grantee independently release a publication or product for sale or dissemination, at its own expense. However, if the grantee releases this information, it may not include use of the OVC logo, or other indicia that it is an official OVC publication.
45. Grant funds may be used only for the purposes in the recipient's approved application. The recipient shall not undertake any work or activities that are not described in the grant application, and that use staff, equipment, or other goods or services paid for with OJP grant funds, without prior written approval from OJP.
46. OVC reserves the right to take appropriate action in instances when the grantee fails to initiate activity on the grant or misses multiple time deadlines. OVC action may include, but is not limited to, termination or suspension of the grant.
47. The grantee agrees that it may not disseminate drafts of training curricula and other grant-supported materials beyond pilot testing of the material, unless otherwise specifically approved by OVC in writing in advance. Such materials must be clearly marked "DRAFT" and the OVC disclaimer must be included on all such documents. The OVC logo shall not be displayed until the document is final and has been approved by OVC for final publication or electronic dissemination. Grantees are advised not to assume that products submitted to OVC will be ready for immediate release. Contact your grant monitor for more information.
48. Grantees producing (1) all videos or (2) any products for grantee's independent release must follow the OVC Publishing Guidelines for placement of logos, inclusion of funding/disclaimer statement, and, if relevant, product barcodes. Check with your grant monitor for tip sheet, "The Essentials," for detailed instructions.
49. The recipient agrees that all income generated as a direct result of this award shall be deemed program income. All program income earned must be accounted for and used for the purposes of funds provided under this award, including such use being consistent with the conditions of the award, the effective edition of the OJP Financial Guide and, as applicable, either (1) 28 C.F.R. Part 66 or (2) 28 C.F.R. Part 70 and 2 C.F.R. Part 215 (OMB Circular A-110). Further, the use of program income must be reported on the quarterly Federal Financial Report, SF 425.
50. The grantee agrees to coordinate, through its OVC program manager, with the Office of the Chief Information Officer (OCIO) of the Office of Justice Programs on any information technology related products, including web-based systems, that will be developed in whole or in part with OVC grant funding. Grantees will obtain OCIO's review and concurrence with the proposed design and implementation to ensure compatibility with the OJP enterprise architecture.
51. No federal funds shall be used to pay for any part of air travel that includes business or first class seating except as authorized for government travel (as described in OMB Circular A-122) and authorized by the grant manager prior to booking such tickets.
52. All procurement (contract) transactions under this award must be conducted in a manner that is consistent with applicable Federal and State law, and with Federal procurement standards specified in regulations governing Federal awards to non-Federal entities. Procurement (contract) transactions should be competitively awarded unless circumstances preclude competition. Noncompetitive (e.g., sole source) procurements by the award recipient in excess of the Simplified Acquisition Threshold (currently \$150,000) set out in the Federal Acquisition Regulation must receive prior approval from the awarding agency, and must otherwise comply with rules governing such procurements found in the current edition of the OJP Financial Guide.



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**GRANT MANAGER'S MEMORANDUM, PT. 1:  
PROJECT SUMMARY**  
Cooperative Agreement

PROJECT NUMBER  
2014-VT-BX-K017

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This project is supported under 22 U.S.C. 7105 (b)(2)(A)

**1. STAFF CONTACT (Name & telephone number)**

Mary R. Atlas-Terry  
(202) 353-8473

**2. PROJECT DIRECTOR (Name, address & telephone number)**

Daniel T. Wall  
Assistant Director  
Stephen P. Clark Center  
111 NW 1st Street, 12th Floor  
Miami, FL 33128  
(305) 373-4742

**3a. TITLE OF THE PROGRAM**

OVC FY 14 Services for Victims of Human Trafficking

**3b. POMS CODE (SEE INSTRUCTIONS  
ON REVERSE)**

**4. TITLE OF PROJECT**

Miami-Dade County Human Trafficking Collaborative Project

**5. NAME & ADDRESS OF GRANTEE**

Miami-Dade County  
111 NW 1st Street  
Miami, FL 33128

**6. NAME & ADDRESS OF SUBGRANTEE**

**7. PROGRAM PERIOD**

FROM: 10/01/2014 TO: 09/30/2016

**8. BUDGET PERIOD**

FROM: 10/01/2014 TO: 09/30/2016

**9. AMOUNT OF AWARD**

\$ 400,000

**10. DATE OF AWARD**

09/16/2014

**11. SECOND YEAR'S BUDGET**

**12. SECOND YEAR'S BUDGET AMOUNT**

**13. THIRD YEAR'S BUDGET PERIOD**

**14. THIRD YEAR'S BUDGET AMOUNT**

**15. SUMMARY DESCRIPTION OF PROJECT (See instruction on reverse)**

The purpose of this award, one of several projects funded under the Services for Victims of Human Trafficking Grant Program, is to enhance the quality and quantity of services available to assist victims of human trafficking, as defined by the Trafficking Victims Protection Act (TVPA) of 2000, as amended.

Miami-Dade County, through their Coordinated Victim Assistance Center, will provide specialized services for victims of human trafficking, using a Family Justice Center model. This two-year project will provide services to trafficking victims identified within the Miami-Dade area of Florida. In addition, the grantee will improve the capacity of communities to respond to human trafficking victims through the development of interagency partnerships and through training and public awareness activities. CANUC



Department of Justice  
Office of Justice Programs  
*Office for Victims of Crime*

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Washington, D.C. 20531

Memorandum To: Official Grant File

From: Zoe French, Grant Program Coordinator

Subject: Categorical Exclusion for Miami-Dade County

The purpose of this award, one of several projects funded under the Services for Victims of Human Trafficking Grant Program, is to enhance the quality and quantity of services available to assist victims of human trafficking, as defined by the Trafficking Victims Protection Act (TVPA) of 2000, as amended. Miami-Dade County, through their Coordinated Victims Assistance Center, will provide specialized services for victims of human trafficking, using a Family Justice Center model. This two-year project will provide services to trafficking victims identified within the Miami-Dade area of Florida. In addition, the grantees will improve the capacity of communities to respond to human trafficking victims through the development of interagency partnerships and through training and public awareness activities.

Consequently, the subject federal action meets OJP's criteria for a categorical exclusion as contained in paragraph 4 (b) of Appendix D to Part 61 of the Code of Federal Regulations. Additionally, the proposed action is neither a phase nor a segment of a project which when viewed in its entirety would not meet the criteria for a categorical exclusion.