

# Florida Department of Law Enforcement

#### Office of Criminal Justice Grants

Post Office Box 1489 Tallahassee, Florida 32302-1489 (850) 617-1250

# Federal Fiscal Year 2020 Project Safe Neighborhoods (PSN) Grant United States Attorney's Office, Middle District of Florida Subrecipient Solicitation

Application Deadline: November 30, 2021

FDLE's Office of Criminal Justice Grants (OCJG) is seeking subrecipient applications for the Project Safe Neighborhoods (PSN) grant program. This program furthers the DOJ mission and violent crime reduction strategy by providing support to state, local, and tribal efforts to reduce violent crime, including but not limited to, felonious firearm crimes and criminal gang violence.

#### **Eligibility Overview**

Eligible applicants are limited to: 1) entities who are located within a county identified in Appendix A; entities who are proposing activities that will occur in the targeted enforcement areas (TEAs) identified in this solicitation; or (3) a research partner proposing collection and analysis of data in identified areas.

Eligible applicants <u>must</u> use at least 30% of their funding to support gang task forces in regions experiencing a significant or increased presence of criminal or transnational organizations engaging in high levels of violent crime, firearm offenses, human trafficking, and drug trafficking.

#### Contact Information

The Office of Criminal Justice Grants (OCJG) main line is (850) 617-1250. For questions regarding this solicitation, ask to speak to the PSN grant manager, Amber Miller. For technical assistance with the Subgrant Information Management Online (SIMON) system, ask for the SIMON Help Desk.

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#### **Program Description**

The Florida Department of Law Enforcement (FDLE) received an award from the United States Department of Justice (DOJ) for \$548,894 in Project Safe Neighborhoods (PSN) funding. This award is to be used by the United States Attorney's Office (USAO), Middle District of Florida, which includes all counties listed in Appendix A of this solicitation.

The PSN program is designed to create and foster safer neighborhoods through a sustained reduction in violent crime, including but not limited to, addressing criminal gangs and the felonious possession and use of firearms. The program's effectiveness depends on the coordination, cooperation, and partnerships of local, state, tribal and federal law enforcement agencies, and the communities they serve, engaged in a unified approach led by the USAO Middle District of Florida.

#### **Program Objectives**

The PSN program objectives are to:

- Implement effective programs and strategies enabling PSN task forces to prevent, respond to, and reduce violent crime;
- Effectively use intelligence and data to identify high crime areas and prolific violent offenders;
- · Foster effective collaboration with effective communities; and
- Create and maintain ongoing coordination among federal, state, local, and tribal law enforcement officials.

#### **Program Strategy and Purpose**

The PSN program encourages the development of practitioner-researcher partnerships using data, evidence, and innovation to create strategies and interventions that effectively make communities safer. This data driven approach enables jurisdictions to understand the full nature and extent of the crime challenges they are facing and to direct resources to the highest priorities.

#### **Evidenced-Based Programs or Practices**

The DOJ Office of Justice Programs (OJP) strongly emphasizes the use of data and evidence in policy making and program development. OJP considers programs/practices to be evidence-based when their effectiveness has been demonstrated by causal evidence, generally obtained through one or more outcome evaluations. Causal evidence documents a relationship between an activity or intervention (including technology) and its intended outcome, including measuring the direction and size of a change, and the extent to which a change may be attributed to the activity or intervention. Causal evidence uses scientific methods to rule out, to the extent possible, alternative explanations for the documented change.

The OJP CrimeSolutions.gov website at <a href="https://www.crimesolutions.gov/">https://www.crimesolutions.gov/</a> is one resource that applicants may use to find information about evidence-based programs.

#### Information Regarding Potential Evaluation of Programs and Activities

Applicants should note OJP may conduct, or support, an evaluation of the programs and activities funded under this solicitation. Subrecipients (at any tier) will be expected to cooperate with program-related assessments or evaluation efforts, including the collection and provision of information or data requested by OJP (or its designee) for the assessment or evaluation of any activities funded under this solicitation.

#### **USAO Program Strategy**

#### **Targeted Enforcement Areas**

The USAO, Middle District of Florida has identified the cities of Fort Myers, Tampa, and Jacksonville as their targeted enforcement areas.

#### **Middle District Goals**

The USAO, Middle District of Florida has established the following goals for the federal fiscal year 2020 PSN program:

- Reduce violent crime throughout the middle district; and
- Utilize partnerships between federal and local law enforcement to investigate and prosecute violent offenders within the existing three jurisdictions.

#### **Eligible Activities**

The USAO, Middle District of Florida has identified the following elements/activities to be supported with federal fiscal year 2020 program funding:

- Equipment, services, and technology for law enforcement;
- Overtime for law enforcement;
- Analyst/data support to assist with data collection and analysis;
- Special Assistant U.S. Attorneys (SAUSAs) and/or other activities for non-federal prosecutors;
- Youth-serving organizations supporting prevention programming, including critical thinking classes, mentoring initiatives, and/or other programs aimed at promoting protective factors and positive youth development;
- Mental health/social services assistance;
- Reentry programming support;
- Academic/research partner services to assist with relevant project/program assessments and evaluations; and/or
- Public awareness and/or multi-media projects/campaigns.

#### **Additional Eligibility Requirements**

PSN applicants must comply with all terms and standard conditions of the federal award and subaward, including those incorporated by reference. In addition to the eligibility requirements on the cover of this solicitation, each PSN applicant must be able to document compliance with the following requirements:

- 2 C.F.R. Part 25—Universal Identifier and System for Award Management (SAM) Requirements
- 28 C.F.R. Part 42—Nondiscrimination; Equal Employment Opportunity; Policies and Procedures
- <u>2 C.F.R Part 200.300-309</u>—Standards for Financial and Program Management
- 2 C.F.R. §200.318-326—Federal Procurement Standards

#### **DUNS and SAM Registration**

To apply for PSN funds an organization must have a DUNS number. A DUNS number may be obtained by calling (866) 705-5711 or by visiting the <u>Dun & Bradstreet website</u>. A DUNS number is usually received within one to two business days.

The organization must also be registered with the U.S. Federal Government's System for Award Management (SAM) (2 C.F.R. Part 25). To create or update your SAM registration, go to <a href="https://www.SAM.gov">www.SAM.gov</a>. The SAM registration process may take up to ten business days.

#### **Compliance with Applicable Federal Laws**

At the time of application, potential subrecipients are required to certify compliance with all applicable federal laws. If FDLE, or OJP, receives information indicating an applicant may be in violation of any applicable federal laws, the applicant may be referred to the DOJ Office of Inspector General (OIG) for investigation. If the applicant is found to be in violation of an applicable federal law by the OIG, the applicant may be subject to criminal and civil penalties in addition to relevant OJP programmatic penalties which include suspension or termination of funds, inclusion on the high risk list, repayment of expended funds, and/or suspension and debarment proceedings.

#### **Civil Rights Requirements**

Federal laws prohibit subrecipients of financial assistance from discriminating on the basis of race, color,

national origin, religion, sex, disability, or age in funded programs or activities. All subrecipients, implementing agencies, contractors and vendors must comply with all statutorily imposed nondiscrimination requirements, including but not limited to:

- Title VI of the Civil Rights Act of 1964: Applicants must comply with all applicable requirements
  of 28 C.F.R. Part 42, including any pertinent requirements in Subpart E relating to equal
  employment opportunity (EEO) programs. Applicants are advised to use the Office for Civil Rights
  EEO Reporting Tool to complete the required certification and any applicable EEO program reports.
- Limited English Proficiency (LEP): Applicants receiving federal financial assistance must take steps to provide meaningful access to programs and activities for persons with LEP. FDLE strongly advises applicants have a written LEP Language Access Plan. For more information visit <a href="https://www.lep.gov/">https://www.lep.gov/</a>.
- **Equal Treatment for Faith Based Organizations**: Applicants must comply with all applicable requirements of 28 C.F.R. Part 38, "Equal Treatment for Faith Based Organizations".
- Americans with Disabilities Act (ADA): Applicants must comply with the requirements of the ADA, Public Law 101-336, which prohibits discrimination on the basis of disability, including provisions to provide reasonable accommodations.

**Filing a Complaint** - If the applicant, or any of its employees, contractors, vendors, or program beneficiaries, has a discrimination complaint, they may file a complaint with the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice; 810 7th Street, Northwest, Washington, D.C. 20531; or by phone at (202) 307-0690.

Discrimination complaints may also be submitted to FDLE's Office of the Inspector General, Post Office Box 1489, Tallahassee, Florida 32302-1489, or via email to <a href="mailto:info@fdle.state.fl.us">info@fdle.state.fl.us</a>. Any discrimination complaints filed with FDLE's Inspector General are referred to the Office for Civil Rights, the Florida Commission on Human Relations, or the Equal Employment Opportunity Commission, based on the nature of the complaint.

**Intergovernmental Review** - Federal fiscal year 2020 PSN program is subject to Executive Order 12372, "Intergovernmental Review of Federal Programs." As a result, FDLE may provide information regarding subrecipient applications to the state single point of contact to satisfy this requirement.

#### Match

This program does not require a match. However, if an application proposes a voluntary match amount, and FDLE/DOJ approves the budget, the total match amount incorporated into the approved budget becomes mandatory and subject to audit.

#### **Prohibited Uses**

Administrative costs/fees for applicants/subrecipients are not allowable on PSN subawards.

PSN funds may not be used to supplant state or local funds. Funds must only be used to increase the amount of funds that would, in the absence of federal funds, be made available for the given activities. For more information on supplanting, see <u>Section 2.3 of the DOJ Grants Financial Guide</u>.

**Project Adjustments** - Retroactive (after-the-fact) approval of project adjustments or items not currently in the approved subaward will only be considered under extenuating circumstances. Subrecipients who incur costs prior to approval of requested adjustments do so at the risk of the items being ineligible for reimbursement under the award.

#### **Costs Requiring Pre-Approval**

#### **Conference/Meeting/Training Costs**

OJP policy and guidance encourages minimization of conference, meeting, and training costs; sets cost limits including a general prohibition of all food and beverage costs; and requires prior written approval of most conference, meeting, and training costs. Subawards requesting grant funds for meetings, trainings, or conferences may be required to complete and submit an OJP event submission form upon request from FDLE and/or OJP.

#### **Sole Source**

If a subrecipient requests to procure goods or services costing \$10,000 or more by sole source to a single vendor, a sole source justification must be submitted to FDLE for approval prior to the obligation of grant funds. For a sole source procurement over the federal Standard Acquisition Threshold (SAT) of \$250,000, written pre-approval must be obtained from both FDLE and DOJ. Subrecipients should submit the completed "Sole Source Justification" form with the application or as soon as the procurement method is known.

Sole source approval applies to the amount of the total procurement, regardless of the amount of federal investment in the purchase. Before submitting a request for a sole source procurement, applicants should carefully review the conditions governing this type of procurement (see 2 C.F.R. § 200.320(c)).

#### National Environmental Policy Act (NEPA)

Any improvement, building enhancement, or construction project will require pre-approval to ensure compliance with NEPA. This may include relatively minor activities such as installing fence posts, security or surveillance cameras, or anchoring any item to the ground. If the grant will fund any activities that may fall under this requirement, review the subaward standard condition related to NEPA and the section of the DOJ/BJA website related to NEPA compliance and contact FDLE's grant's office for assistance.

#### **Publications and Other Media**

All media created, published, and/or altered using federal grant funds must be reviewed and approved by FDLE and/or BJA prior to release or distribution. This includes any curricula, training materials, brochures, or other written materials that will be published, including web-based materials and web site content, as well as all audio or video materials, including Public Service Announcements. Subrecipients must submit a draft of each proposed item to OCJG no later than thirty (30) days prior to the targeted dissemination date. For items containing videos, a transcript may be provided with screenshots or a description of the visual portion.

All materials publicizing or resulting from award activities shall contain the following statements:

"This project was supported by Award No. 2020-GP-BX-0068 awarded by the Bureau of Justice Assistance, Office of Justice Programs. The opinions, findings, and conclusions or recommendations expressed in this publication/program/exhibition are those of the authors and do not necessarily reflect the views of the Department of Justice."

This requirement does not apply to the purchase or reproduction of existing materials or items created by other agencies or vendors, unless the subrecipient alters the item in any way. Neither does this requirement apply to items serving only to advertise an event or the availability of services. Please contact FDLE's grant's office with questions or to clarify pre-approval requirements.

## **Additional Requirements**

PSN applicants will be required to complete the following documents at the time of application; failure to do so may result in the withholding of funds until items are received.

#### Subaward Management Capabilities and Compliance Questionnaire (SMQ)

All applicants are required to complete the <u>Subaward Management Capabilities and Compliance</u> Questionnaire. FDLE will use this form to validate eligibility to apply for, receive, and maintain the PSN

subaward. Additionally, this validation will allow FDLE to expedite the monitoring process and ensure all subrecipients are in compliance with program requirements. Applicants must submit a Subaward Management Capabilities and Compliance Questionnaire (SMQ) to FDLE with their application.

# <u>Certification Regarding Lobbying; Debarment, Suspension, and Other Responsibility Matters; and Drug Free Workplace Requirements</u>

Subrecipients are not permitted to use federal funds, directly or indirectly, in support of any lobbying activity. A subrecipient receiving or requesting an award exceeding \$100,000 must certify compliance with this requirement.

Additionally, a person/agency that is debarred, suspended, declared ineligible or is voluntarily excluded is prohibited from receiving federal funds under this grant program. All subrecipients must certify the subgrantee organization, and any vendor or lower tiered subrecipient, is eligible to receive these funds.

State agencies applying for federal grant funding under this program must certify compliance with the Drug-Free Workplace Act of 1988, including establishing and maintaining a drug-free work environment.

Failure to submit the <u>"Certification Regarding Lobbying, Debarment, Suspension, and Other Responsibility Matters; and Drug Free Workplace"</u> to FDLE may result in a withholding of funds condition on the subaward until this requirement is satisfied.

#### **Contractual Services Subrecipient vs. Contractor Determination**

Subrecipients utilizing funds in the Contractual Services budget category must adhere to the subcontracting requirements below. All subrecipients should review the <u>"OJP Subaward vs. Procurement Toolkit"</u> for information regarding the two types of subcontracting.

Any applicant using grant funds in the Contractual Services budget category must complete and submit the "<u>Subrecipient vs. Contractor Determination Checklist</u>" for each contracted services item listed on the budget, to FDLE along with the application.

#### **Employment Eligibility Verification**

Subrecipients must ensure that as part of the hiring process for any position that is or will be funded (in whole or in part) with award funds, the employment eligibility of the individual being hired is properly verified in accordance with the provisions of 8 U.S.C. 1324a(a)(1) and (2). The subrecipient may choose to participate in, and use E-Verify (<a href="www.e-verify.gov">www.e-verify.gov</a>), provided an appropriate person authorized to act on behalf of the subrecipient entity uses E-Verify to confirm employment eligibility for each position funded through this award.

#### **Determination of Suitability to Interact with Participating Minors**

Subrecipients, at any tier, who plan to use federal funds to partially or fully carry out activities under this award to benefit a set of individuals under 18 years of age must make determinations of suitability before certain individuals may interact with participating minors. Further information regarding this requirement is located on the OJP website <a href="https://www.ojp.gov/funding/explore/interact-minors">https://www.ojp.gov/funding/explore/interact-minors</a>.

- 1. Any applicant using grant funds to benefit a set of individuals under 18 years of age must complete and submit the "Suitability to Work and/or Interact with Minors Certification."
- 2. Subrecipients must maintain and submit the "Suitability to Work and/or Interact with Minors Tracking Sheet."

#### Telecommunications and Video Surveillance Services or Equipment

In compliance with 2 C.F.R. 200.214, subrecipients are prohibited from entering into a contract or using federal funds to procure items from certain parties who are debarred, suspended or otherwise excluded from or ineligible for participation in federal assistance programs or activities. In addition, a prohibition on certain telecommunication and video surveillance services or equipment went into effect on August 13, 2020. In accordance with these requirements set out in 2 C.F.R. 200.216, subrecipients of FDLE awards are prohibited from obligating or expending grants to:

- A. Procure or obtain:
- B. Extend or renew a contract or procure or obtain;
- C. Enter into a contract to procure or obtain equipment, services, or systems that use telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system, produced by Huawei Technologies Company or ZTE Corporation (or a subsidiary or affiliate of such entities).

Applicants who intend to use grant funds to procure telecommunications, video surveillance services, or equipment must:

 Complete and submit the "<u>Telecommunications and Video Surveillance Services or Equipment</u> Certification."

Provide documentation the manufacturer and vendor has not been suspended or debarred from receiving federal funds in <u>SAM.gov</u> prior to the drawdown of funds.

#### **State and Federal Transparency**

Subaward agreements and information supplied to FDLE for grant management and payment purposes will be used to report to the following mandatory state and federal transparency systems:

#### Federal Funding Accountability and Transparency Act (FFATA)

The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006, with the intent to empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce wasteful spending in the government. The FFATA legislation requires information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website, <u>usaspending.gov</u>. FDLE is also required to report subaward data to FFATA.

#### Florida Accountability and Contract Tracking System (FACTS)

The grant agreement and all corresponding information/documentation is provided to <u>FACTS</u> in accordance with Chapter 2013-54 and 2013-154, Laws of Florida.

#### **Exemption from FACTS**

The SIMON grant management system allows for partial or complete exemption from FACTS for those agreements containing information exempt from public records. Please be aware, in the event that your agency's application submission contains confidential and/or exempt information prohibited from public dissemination under Florida's Public Records Law, Chapter 119, Florida Statutes; the PSN subrecipient bears the responsibility for applying proper redactions. Otherwise, any and all records submitted may be released without redactions.

#### **How to Apply**

Failure to follow application instructions may result in the incursion of a special condition at the time of award or exclusion of the application from consideration by the competitive panel.

A completed <u>subgrant application questionnaire</u> and <u>budget detail worksheet</u> must be submitted to <u>roridunbar@fdle.state.fl.us</u>. OCJG grant managers will use the information provided to prepare an application in the FDLE <u>Subgrant Information Management Online (SIMON)</u> grant system. The applicant will be notified when a draft of the application is ready to be reviewed and submitted in SIMON.

Please note: Once an application is approved, the SIMON system will be used for subgrant management activities including required monthly/quarterly financial and performance reporting.

#### **Application Deadline**

An <u>application questionnaire</u>, <u>budget detail worksheet</u>, and any additional required documents should be submitted via email to <u>roridunbar@fdle.state.fl.us</u> by no later than 11:59 P.M. on **Tuesday**, **November 30**, **2021**. Applications will <u>not</u> be accepted after the deadline.

Please see **Appendix B** for other important dates.

#### **Application Review Process**

Subgrants will be awarded based on a competitive process. Applications received by the deadline above will be reviewed by a selection committee. The panel will review each application based on the criteria provided in **Appendix C**. After committee review, FDLE will submit all recommended applications to DOJ for final approval.

#### **Standard Conditions**

Subaward agreements for applications recommended by the selection committee, and approved by DOJ, will be provided to the approved subrecipient. This agreement will include standard conditions which detail compliance requirements for subrecipients. It is imperative for all persons involved with this subaward to read the standard conditions. Failure to comply with the provisions outlined in the standard conditions may result in project costs being disallowed, or other remedies for noncompliance identified in 2 CFR §200.338.

#### Length of Award

Fiscal year 2020 PSN subawards may elect to have a project period between 12- and 24-months beginning October 1, 2021. The final length of the grant period will be determined by the selection committee in conjunction with federal award dates. The federal award period ends September 30, 2023. No projects will extend past this date.

#### **Distribution of Funds**

Grant funds are distributed on a cost reimbursement or advance basis for satisfactory performance of activities set forth in the subaward agreement. Requests for reimbursement can be submitted on a monthly or quarterly calendar basis and should include total expenditures paid for during the reporting period. Reimbursements will be processed in conjunction with the receipt and review of programmatic performance reports and supporting documentation to determine successful completion of deliverables as specified in the subgrant agreement.

#### Appendix A: FY20 USAO County Listing for the Middle District of Florida

Eligible entities within the following counties are able to submit applications under this Solicitation. If your county does not appear on this list, please check for other PSN solicitations within your USAO District posted on the OCJG website at <a href="http://www.fdle.state.fl.us/Grants/Current-Funding-Opportunities">http://www.fdle.state.fl.us/Grants/Current-Funding-Opportunities</a>.

Note: Applicants are reminded to review the program goals and TEAs outlined on page three and four of this solicitation.

Baker County

**Bradford County** 

**Brevard County** 

**Charlotte County** 

Citrus County

Clay County

**Collier County** 

Columbia County

**Desoto County** 

**Duval County** 

Flagler County

**Glades County** 

**Hamilton County** 

Hardee County

**Hendry County** 

Hernando County

Hillsborough County

Lake County

Lee County

Manatee County

**Marion County** 

Nassau County

**Orange County** 

Osceola County

Pasco County

Pinellas County

Polk County

**Putnam County** 

Sarasota County

Seminole County

St. Johns County

**Sumter County** 

**Suwanee County** 

**Union County** 

Volusia County

### **Appendix B: Application Timeline**

| March 31, 2020    | Florida received notice of final state PSNM appropriation from U.S.  Department of Justice                            |
|-------------------|---|
| June 1, 2020      | FDLE Office of Criminal Justice Grants (OCJG) submitted the State of Florida application for FY 2020 PSNM funding.    |
| December 13, 2020 | Florida accepted the state's FY 2020 federal PSNM award.  |
| October 1, 2021   | OCJG released PSNM subgrant solicitation on the department's website;<br>Notification emails sent to chief officials. |
| November 30, 2021 | Deadline to submit applications to OCJG.  |
| January 2022      | Competitive selection process and subaward recommendations provided to DOJ.   |

# **Appendix C: Application Scoring Tool**

| General Application (A "no" response, places application in rejection pool.)   | Points |  |
|--|--------|--|
| Applicant is located in, or will be serving, a targeted enforcement area identified in the solicitation                                      | 1      |  |
| Applicant has an active SAM.gov registration   | 1      |  |
| Application packet and budget detail worksheet were received   | 1      |  |
| All required forms are included (SMQ, Lobbying, and EEO Certification)   | 1      |  |
| All optional forms are included as they apply to the proposed project  | 1      |  |
| TOTAL  | 5      |  |
| Overview   | Points |  |
| A subrecipient agency name is provided   | 1      |  |
| The project period begins on or after 10/1/2021  |        |  |
| The project period ends on or before 9/30/2023   | 1      |  |
| The amount requested is consistent with the total on the budget detail worksheet   | 1      |  |
| A DUNS number and FEID are provided  |        |  |
| TOTAL  | 5      |  |
| Problem Identification   | Points |  |
| Clearly describes how the PSN program services a targeted enforcement area   | 5      |  |
| Clearly describes how the PSN program addresses the USAO goals identified  | 5      |  |
| Clearly describes the violent crime problem to be addressed  | 5      |  |
| Provides data to support the violent crime problem identified  | 5      |  |
| Proposes to use evidence-based practices and describes the practices to be used  | 5      |  |
| TOTAL  | 25     |  |
| Scope of Work  | Points |  |
| Clearly describes key partners and their responsibilities as it relates the applicant's PSN program  | 5      |  |
| Includes an amount allocated for each funding category selected in question 2  | 5      |  |
| Clearly describes how each selected funding category correlates to the USAO goals and activities   | 5      |  |
| Provides a clear timeline of activities and is consistent with the proposed project period   |        |  |
| TOTAL  | 20     |  |
| Performance  | Points |  |
| Applicant acknowledged the performance requirements  | 5      |  |
| TOTAL  | 5      |  |
| Additional Information   | Points |  |
| Applicant provided an operating capital outlay threshold   | 5      |  |
| Applicant selected a performance/financial reporting frequency   | 5      |  |
| Applicant described the methods of procurement to be used, if applicable   | 5      |  |
| Applicant provided a response to questions 4, 5, and 6 as appropriate  | 5      |  |
| TOTAL  | 20     |  |
| Grant Contacts and Officials   | Points |  |
| Contact information for Subgrant Chief Official, Subgrant Chief Financial Officer,   | 5      |  |
| Project Director, and Application Manager is provided  If an implementing agency was identified in the overview section, contact information | 5      |  |
| for the Implementing Agency Chief Official is provided   |        |  |
| TOTAL  | 10     |  |
| Budget Detail Worksheet  | Points |  |
| Applicant information is correctly filled out and consistent with the information in the application narrative                               | 5      |  |
| All budget line items clearly to eligible activities provided in the solicitation  | 5      |  |
| TOTAL  | 10     |  |