

OFFICE OF THE GOVERNOR

**KAY IVEY**  
GOVERNOR



STATE OF ALABAMA


ALABAMA DEPARTMENT OF ECONOMIC  
AND COMMUNITY AFFAIRS

**KENNETH W. BOSWELL**  
DIRECTOR

August 10, 2018

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 1 (Revision 1)**

**TO: Authorizing Officials and Program Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director**   
Alabama Department of Economic and Community Affairs

**SUBJECT: Policy Guide for ADECA LETS Policies**

Purpose

The purpose of this policy is to rescind the use of the LETS Subrecipient Administrative Manual (SAM), and to replace the SAM with Policy Letters to be followed by ADECA LETS subrecipients.

Guidelines

Effective October 1, 2017, all Alabama Department of Economic and Community Affairs (ADECA) Law Enforcement and Traffic Safety (LETS) Division subrecipients will no longer be required to follow the LETS Subrecipient Administrative Manual (SAM). Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The ADECA LETS Division Chief is authorized to modify or waive the application of ADECA LETS policies under extenuating or exigent circumstances, where such would not interfere with other state or federal requirements.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at (334) 353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at (334) 353-5639.

KAY IVEY  
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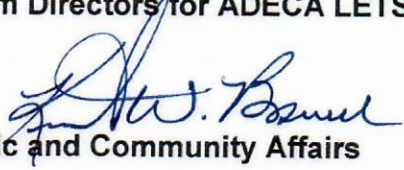
STATE OF ALABAMA

KENNETH W. BOSWELL  
DIRECTOR

October 1, 2017

**Law Enforcement and Traffic Safety  
Policy Letter Number 2**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director   
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding Subgrant Adjustments, Budget Deviations, Budget Revisions

Purpose

The purpose of this policy is to set guidelines for subgrant adjustments, budget deviations and budget revisions

Guidelines

- A. **Subgrant Adjustments:** The approved application for which a subgrant award is made is a part of the contractual agreement. Any change in authorized effort, (i.e., scope, work, schedules or budget), will be justified by the subrecipient and approved by ADECA prior to effectuating the change. A Grant Adjustment Notice will be provided to the subrecipient to authorize any change.
- B. **Budget Deviations:** Any change in the scope of the subgrant requires approval from the granting agency. Program Supervisors will determine when budget deviations can be considered. Line items within a budget category may be adjusted by the subrecipient to meet project needs. Items of equipment or an increase in personnel slots cannot be added utilizing this deviation authority. Subrecipients are allowed to transfer funds from one line item or category of the approved budget to another, provided such deviation does not exceed the following specified limitations:



<u>UNIT COST</u>	<u>ALLOWABLE DEVIATION</u>
(1) Less than \$1,500	15%
(2) \$1,500 or more	10%

**NOTE: Deviation limits apply to the budget category which is being increased.**

**C. Budget Revisions:** Budget revisions will be considered during the subgrant period on a case by case basis. Program Supervisors will be responsible for determining a cutoff date for revisions to be submitted for consideration.

The budget revision may be between categories, e.g., from Equipment to Operating Expense, etc., but cannot change either the total project cost or extend the subgrant period. A budget revision request must be justified in sufficient detail to allow ADECA to make a decision without seeking additional information. Approval of the revision should be received prior to incurring the obligation for new items therein. The subrecipient should:

- (1) Incorporate subgrant changes in a timely manner, recording the effects of such changes in budgets and schedules.
- (2) Prohibit retroactive changes to records pertaining to work performed that will change previously reported amounts, except for correction of errors and routine accounting adjustments.

The revised budget becomes the authorized/approved budget for the remainder of the award period. The revision must reflect the total budget, not just those line items changed.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at 334-353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at 334-353-5639.

**KAY IVEY**  
GOVERNOR




**KENNETH W. BOSWELL**  
DIRECTOR

**STATE OF ALABAMA**

**April 29, 2022**

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 3 (Revision 5)**

**TO: Authorizing Officials and Program Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director**   
**Alabama Department of Economic and Community Affairs**

**SUBJECT: Policy Guide Regarding Subgrant Personnel**

**Purpose**

The purpose of this policy is to set guidelines for subgrant personnel. These guidelines are in addition to those established by federal regulations (specifically, but not limited to, 2 CFR 200.430).

**Guidelines**

In general, the personnel regulations of the subrecipient shall be followed in any subgrant project. If an employer/employee relationship is established, the employee shall be included within the "Personnel" budget category.

- A. Changes in Subgrant Personnel:** Whenever there is a change in a project's Authorized Official, Project Director, Financial Officer, or any person paid from subgrant funds, the subrecipient is required to update all grants funded by the Law Enforcement and Traffic Safety Division.

For all active grants prior to October 1, 2021, the "Notification of Changes in Subgrant Personnel" Form should be used in reporting this information. The signature of the Authorized Official is required to change the Authorized Official, Project Director, or Financial Officer.

For grants managed through the State of Alabama's grant management system, Alabama Grants, the subrecipient should submit a Grant Adjustment Notice (GAN) requesting to



update the authorized officials or any person paid from grant funds. The subrecipient should appropriately update the organization members webpage.

**B. Salary Increase Limitations:** Programs or applications which involve salary increases for personnel shall be limited to the following:

- (1) Salary increases that do not exceed 10% of the current budget are considered reasonable and will not require prior approval by ADECA LETS through a budget revision. Salary increases that exceed 10% will require submission of a budget revision for ADECA LETS to determine whether the request is reasonable and eligible for reimbursement. Where the subrecipient is a government unit, salary increases may equal the percentage increase given to all employees.

This does not pertain to an increase based upon a reassignment of job responsibilities where qualifications can be submitted for ADECA's approval.

- (2) If the applying agency operates under a personnel board or department, the personnel board/department must approve the increase.
- (3) In the event the salaries of personnel of any subrecipient component are established by an Act of the State of Alabama, then the Act shall prevail, and item (1) above shall not apply.

**C. Time and Attendance Records:** Time and attendance records serve to substantiate personnel expenditures in the same manner an invoice substantiates any other expense. Without such a record, payroll expenditures cannot be justified. Amounts charged to subgrant programs for personal services will be based on documented and approved payrolls. Payrolls shall be supported by time and attendance or equivalent records for individual employees, signed by the employee and approved by an approving official. A timesheet has been developed to assist units that do not have time and attendance documentation. **The use of the ADECA LETS timesheet is optional but the requirement for time and attendance records to substantiate payrolls is mandatory.** This is a form whereby an employee records his/her hours worked, preferably on a daily basis. It identifies time worked on various federal programs, and accounts for the total activity for which employees are compensated and which is required in fulfillment of their obligations to the organization. Each form is to be signed by the individual employee and approved by a responsible supervisory official having first-hand knowledge of the activities performed by the employee at least monthly. Records must properly reflect the percentage of time that an individual is working as indicated in the approved budget, except for drug task forces. Any leave taken should be allocated across funding sources based on allowable activities. Without such records, no personnel expenditures can be allowed. Time and attendance records are not required to be submitted with your Request for Funds. However, they will be maintained for audit/monitoring purposes with other supporting documentation.

- D. **Daily Activity Logs:** Activity logs must be maintained for all federally funded programs unless otherwise stated in the OMB Super Circular (2 CFR Part 200). Under certain circumstances Subrecipients may be asked to provide a personnel certification in lieu of the activity log, which certifies that program staff worked 100% of their time under one funding source. Subrecipients should have policies and procedures in place for making sure that this form is completed every six months or completed prior to separation of employment. Subrecipients should have policies and procedures in place to ensure that Daily activity logs must at a minimum contain the following:

- (1) Date
- (2) Program Name
- (3) Allowable activities performed
- (4) Amount of time spent on allowable activities

Personnel expenditures assigned to grants must be supported with an after the fact accounting that reflects the actual activity of each employee.

Daily activity logs are not required to be submitted with your request for funds. However, they must be maintained for audit/monitoring purposes.

- E. **Two or More Subgrant Programs:** Where salaries apply to execution of two or more subgrant programs, or cost activities, proration of costs to each activity must be made based on time and/or effort reports. In cases where two or more subgrants constitute one identified activity or program, salary charges to one subgrant may be allowable after written permission is obtained from the Law Enforcement/Traffic Safety Division, ADECA. Salary supplements including severance provisions and other benefits with non-subgrant controlled funds are prohibited without approval of ADECA.

- F. **Extra Work:** A state or local government employee may be employed by a subrecipient in addition to his full-time job provided the work is performed on the employee's own time and:

- (1) The compensation is reasonable and consistent with that paid for similar work in other activities of state or local government.
- (2) The employment arrangement is approved and proper under state or local regulations (no conflict of interest).
- (3) The time and/or services provided is supported by adequate documentation.
- (4) To avoid problems arising from overtime, holiday pay, night differential or related payroll regulations, such employment arrangements would normally be made by the



subrecipient directly with the individual, unless there has been a transfer or loan of the employee for which his regular and overtime services provided are to be charged to or reimbursed by the subrecipient. Overtime and night differential payments are allowed only to the extent the payment for such services is in accordance with the policies of the state or unit(s) of local government and has the approval of the state or the grantor agency, whichever is applicable. The overtime premium should be prorated among the various jobs and not charged exclusively to grantor agency funds.

- (5) Payment of these premiums will be for work performed by subgrant employees in excess of the established work week (usually 40 hours). Payment of continued overtime is subject to periodic review by the state or grantor agency, whichever is applicable.

**G. Subgrant Purposes and Dual Compensation:** Charges of the time of state and local government employees assigned to subgrant programs may be reimbursed or recognized only to the extent they are directly and exclusively related to subgrant purposes. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from his unit or agency of government and from a subgrant for a single period of time (e.g., 1 p.m. to 5 p.m.) even though such work may benefit both activities.

**H. Termination Allowances:** Compensation for accrued leave and/or other benefits for which an employee may be entitled upon termination will be limited to that earned during employment by the subgrant project. Accrued benefit entitlements for personnel transferred to a subgrant project must be paid from other sources and not be considered a part of the subgrant budget.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state, and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to the subrecipient's program manager, or call 334-242-5897.

**KAY IVEY**  
GOVERNOR



**KENNETH W. BOSWELL**  
DIRECTOR

STATE OF ALABAMA

March 14, 2024

Law Enforcement and Traffic Safety Division  
Policy Letter Number 4 (Revision 2)

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director *Kenneth W. Boswell* <sup>AWB</sup>  
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding Request for Funds and Expenditures

Purpose

The purpose of this policy is to set guidelines for request for funds and expenditures. These guidelines are in addition to those established by federal regulations (specifically, but not limited to, 2 CFR 200.305).

Guidelines

- A. **Request for Funds:** Funds for an approved subgrant will be obtained by the submission of a Request for Funds. Funds provided will be limited to those authorized by the approved budget.
- (1) **Advanced Funds:** The subrecipient may be paid on an advance payment basis, provided the subrecipient maintains or demonstrates the willingness and ability to maintain both written procedures that minimize the time elapsing between the transfer of funds and their disbursement by the subrecipient (within 10 days), and financial management systems that meet the standards for fund control and accountability. NHTSA subrecipients are excluded from receiving advanced funds. Advance payments must be limited to the minimum amounts needed and be timed in accordance with the actual, immediate cash requirements of the subrecipient in carrying out the purpose of the approved program. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the subrecipient for program costs. If these requirements cannot be met or if it is determined that the requirements have not been met, the subrecipient will be paid by reimbursement method on all future funding requests. Any subrecipient who



does not wish to use the advance method may voluntarily request for payments to be made by reimbursement method.

Invoices must separately reflect any amount being advanced and subsequent invoices must include expenditures as well as future advances.

- (2) **Reimbursement of Funds:** The subrecipient may request, in writing, to be paid on a reimbursement basis over the duration of the agreement. Source documentation for incurred expenditures must accompany all invoices. The ADECA LETS Division Chief may override the reimbursement policy to allow for an advance.

All expenses, other than personnel, must be substantiated by invoices. A "statement" is insufficient because it only identifies the invoice number and amount of funds. The "invoice" identifies the articles purchased or the services performed. However, in the event an expenditure does not have a corresponding invoice, the expenditure must be substantiated by such documentation deemed adequate by ADECA. Subrecipients will be notified by program staff as to what documentation is to be submitted with Request for Funds and when that documentation is to be submitted.

**B. Frequency of Payments:**

- (1) **Advance Payment:** Subrecipients are required to send in Request for Funds at least twice per month. The only expenses on the request should be for those expenses that can be paid within 10 days of receiving the funds. Subrecipients that have more than one pay period per month must submit separate request for funds for each pay period.
- (2) **Reimbursement Payment:** Subrecipients are required to submit Request for Funds by the 15<sup>th</sup> of each month, unless subrecipients receive program specific guidance regarding the submission of reimbursement requests. Subrecipients should limit their request for funds to only one each month, unless there is justification for submitting additional requests. It is important that the subrecipient understands the time frame involved in handling a Request for Funds. The subrecipient should expect to experience a minimum of a two to four-week delay in receiving a check/EFT.

- C. **Expenditure of Funds:** Funds which have been properly obligated by the end of the subgrant period will have sixty (60) days in which to be liquidated (expended). Except under extenuating circumstances, and as approved by ADECA, no funds will be reimbursed beyond the sixty (60) day closeout period. Any funds remaining in the subgrant after the sixty (60) day period will revert to ADECA.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant

Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

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**KENNETH W. BOSWELL**  
DIRECTOR

October 1, 2018

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 5 (Revision 1)**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director *KWB*  
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding Internal Controls

Purpose

The purpose of this policy is to set guidelines for internal controls. These guidelines are in addition to those established by federal regulations (specifically, but not limited to, 2 CFR 200.303).

Guidelines

**Internal Controls:** The subrecipient must establish and maintain a system of internal controls adequate to safeguard subgrant funds and resources, check the accuracy and reliability of the subgrant accounting and financial data, promote operational efficiency and encourage adherence to prescribed managerial policies. Appropriate internal controls are comprised of a plan of organization (subrecipient policies, structure, division of staff functions, procedures, staff qualifications, etc.) designed to provide effective financial and operational control over programs or projects. The degree of internal control depends on the size of the subrecipient and the funds and resources for which the subrecipient is responsible. The following criteria are basic to an adequate system of internal control:

- 1) Operating policies must be clearly stated; systematically communicated throughout the organization; in conformance with applicable laws and external regulations and policies; and designed to promote the execution of authorized activities effectively, efficiently, and economically.

- 2) Organizational structure must define and assign responsibility for the performance of all duties necessary to carry out the functions of the subrecipient.
- 3) Responsibility for assigned duties and functions of the subrecipients must be classified according to authorization, performance, record keeping, custody of resources, and review, to provide proper internal checks on performance and to minimize unauthorized, fraudulent, or otherwise irregular acts.
- 4) Individuals listed on the Grant Application Cover Page as the authorizing official, project director and financial officer must be three separate individuals. One person may not serve in two capacities. For non-profit subrecipients, the authorizing official must be the board chair and the project director should be the executive director.
- 5) A system of forward planning, embracing all phases of the subrecipient's operation, must be developed to determine and justify financial, property, and personnel requirements and to carry out subgrant operations effectively, efficiently, and economically.
- 6) Subgrant procedures must be simple, efficient, and practical, giving due regard to the nature of the subgrant and applicable legal and regulatory requirements. Feasibility, cost, risk of loss or error, and availability and suitability of personnel are factors that should be considered in formulating the procedures.
- 7) An adequate system of authorization, record keeping, and transaction coding procedures must be designed by the subrecipient to ensure compliance with prescribed subgrant requirements and restrictions of applicable laws, regulations, and internal management policies; to prevent illegal or unauthorized transactions; and to provide proper accounting records for the expenditure of subgrant funds.
- 8) An adequate and efficiently operated information system must be designed to provide prompt, essential, and reliable operating and financial data to the subrecipient responsible for decision-making and performance review.
- 9) The performance of all duties and functions of subrecipient personnel must be properly supervised. All performance must be subject to adequate review under an effective internal audit program to determine whether performance is effective, efficient and economical and whether management policies are observed; applicable laws, prescribed regulations, and subgrant conditions are obeyed; and unauthorized, fraudulent, or otherwise irregular transactions or activities are prevented or discovered.



- 10) The qualifications of officials and employees with regard to education, training, experience, competence, and integrity must be appropriate for the responsibilities, duties, and functions assigned to them.
- 11) Each official and employee must be fully aware of his/her assigned responsibilities and understand the nature and consequences of his/her performance. Each must be held fully accountable for the honest and efficient discharge of his/her duties and functions, including, where applicable, the custody and administration of funds and property, and compliance with subgrant regulations and legal requirements.
- 12) Effective procedures must be implemented for expenditure control to ensure that needed goods and services are acquired at the lowest possible cost; that goods and services paid for are actually received; that quality, quantity, and prices are in accordance with applicable contracts or other authorizations by subgrant officials and that such authorizations are consistent with applicable statutes, regulations, policies, and subgrant requirements. Appropriate documentation must be maintained.
- 13) All funds, property, and other resources for which the subrecipient is responsible must be appropriately safeguarded and periodically inventoried to prevent misuse, unwarranted waste, deterioration, destruction, or misappropriation.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

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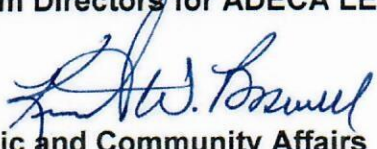
ALABAMA DEPARTMENT OF ECONOMIC  
AND COMMUNITY AFFAIRS

**KENNETH W. BOSWELL**  
DIRECTOR

October 1, 2017

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 6**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director   
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding Program Income

Purpose

The purpose of this policy is to set guidelines for program income. These guidelines are in addition to those established by federal regulations (specifically, but not limited to, 2 CFR 200.80 and 2 CFR 200.307).

Guidelines

**Program Income:** Program income means gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance. See 2 C.F.R. § 200.80 (definition of "Program Income"). Non-Federal entities are encouraged to earn income to defray program costs where appropriate. See 2 C.F.R. § 200.307(a).

Depending on guidance provided by the DOJ grant-making component, subaward recipients can either use program income to advance program objectives or refund program income to the awarding agency. Most types of recipients, absent more specific guidance from the DOJ grant-making component, must use program income to offset total allowable costs, and reduce the Federal award and non-Federal entity contributions (i.e., the deduction method). Institutions of Higher Education (IHE) and non-profit research institutions, absent more specific guidance, may use program income to add to the total allowable costs for the project (i.e., the addition method). See 2 C.F.R. § 200.307(e). Program income may only be used for allowable program costs and must be spent prior to draw downs. See 2 C.F.R. § 200.305(b)5). The draw down



restriction does not apply to Juvenile Accountability Block Grant (JABG) and Justice Assistance Grant (JAG) awards.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

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KENNETH W. BOSWELL  
DIRECTOR

August 10, 2018

Law Enforcement and Traffic Safety Division  
Policy Letter Number 7 (Revision 1)

TO: Authorizing Officials and Program Directors for ADECA LETS  
Grants

FROM: Kenneth W. Boswell, Director  
Alabama Department of Economic and Community Affairs

SUBJECT: Policy Guide Regarding Travel

A handwritten signature in blue ink, appearing to read "Kenneth W. Boswell", is written over the printed name of the Director.

Purpose

The purpose of this policy is to set guidelines for travel.

Guidelines

Travel costs are allowable as expenses by employees who are in travel status on official business. These costs must be necessary and reasonable. Travel costs for contracted individuals may be allowed with prior written approval from ADECA. **All** personnel who travel on behalf of the project and are not "employees of the project" must certify that they are working 100% of the time for the project while they are in travel status. Such certification must be approved by an approving authority of the subrecipient and submitted with the travel voucher. "Employees of the project" is defined as only those employees listed in the personnel section of the budget. These costs must be in accordance with State, Federal or an organizationally approved travel policy. Definitions for travel are:

- (a) Domestic Travel: Includes travel within and between Canada, Mexico, the United States and its territories and possessions.
- (b) Foreign Travel: Includes any travel outside of Canada, Mexico and the United States and its territories and possessions.

Subrecipient shall follow their travel policy. If the subrecipient does not have an established travel policy, no travel expenses are allowed until subrecipient organization authorizes such travel. Although the subrecipient will follow their agency travel policy, ADECA's reimbursement is limited to the following:

(1) **In-state travel** is reimbursed by ADECA on a per diem basis in lieu of actual expenses. The State per diem includes all charges for meals, lodging, fees, and tips. The following regulations apply:

- a) Travel Requiring an Overnight Stay: A trip less than **100 miles** one-way will not require an overnight stay. However, overnight trips of less than 100 miles are permitted if, based on the judgement of the LETS division chief, returning home each night would be unreasonable. Subrecipient must obtain this **approval in writing from the LETS division chief in advance** of any overnight trip of less than 100 miles. Subrecipient must submit a copy of the justification approved by the LETS director with the Request for Reimbursement. Travel reimbursements regarding an overnight stay will be limited to/by the authorized state per diem rate. The current allowance for overnight per diem is \$85.00 or \$100.00 per day depending on the length of the trip. For travel requiring one overnight stay, the traveler will be paid \$85.00 per day. For travel requiring stays of two or more nights the traveler will be paid \$100.00 per day.
- b) Travel Which Does Not Require an Overnight Stay: Computation will utilize the authorized rate, currently as follows:
  - i. No unit or meal allowance for a trip of less than **six** hours' duration.
  - ii. No meal allowance will be paid if the traveler remains in the city where his/her base is located.
  - iii. One meal allowance (\$12.75) for a trip of from **six** to **twelve** hours' duration.
  - iv. One unit (\$21.25) and one meal (\$12.75) for a trip of more than 12 hours' duration. (One unit = ¼ days per Diem rate.)
- c) Transportation: Transportation by private automobile, when authorized, may be reimbursed at the current mileage rate, which is based on the IRS rate and effective January of each year. Contact the Law Enforcement/Traffic Safety Division for the current mileage rate.

(2) **Out-of-state travel** costs will be reimbursed on an actual expense basis for reasonable and necessary expenses. All out-of-state travel must be preapproved by ADECA LETS in writing. All requests should be submitted with an agenda at least one month prior to the out-of-state travel. Although travel may be included in the budget and budget narrative, this does not constitute prior approval. Written approval must also be submitted with reimbursement documents. The following limits are established for out-of-state travel:



- a) Transportation: Air travel at tourist (coach) rate is allowed. Travel by private automobile may be authorized at the approved rate; however, the cost of automobile travel will not exceed tourist rate airfare. If private automobile is utilized, travel time for reimbursement purposes will be limited to travel time required by plane. Taxi/Shuttle service should be used to and from the airport. Taxi service is limited to official business only. For reimbursement, a receipt must be attached to the travel claim, regardless of cost. Auto rental is not allowable unless justified and prior written approval obtained from the subrecipient approval authority. Travel tickets are required for reimbursement.
- b) Lodging: Cost of lodging is limited to single room rates or one-half double occupancy rates. No suites are allowed. When selecting a hotel subrecipients should base selections off the following order:
  - i. First select to stay at the conference/training hotel. A less expensive hotel may be chosen if it does not excessively increase in-town transit costs.
  - ii. Use the federal per diem rate for lodging ([www.GSA.gov](http://www.GSA.gov))
  - iii. Any lodging cost that exceeds the above, the subrecipient must submit justification and get prior written approval from ADECA LETS

Individual lodging receipts are required for reimbursement.

- c) Meals: The cost of meals is limited to the subrecipient's agency policy or the federal per diem rate for food, whichever is less. The federal per diem rate can be found at [www.GSA.gov](http://www.GSA.gov).

### **(3) Travel Reimbursement Procedures:**

- a) In-State Travel: State of Alabama Official In-State Travel form may be used to obtain reimbursement for in-state travel. Although it is not necessary to utilize the travel form provided by the ADECA LETS Division, the same information must be included on any other form. Hotel bills and meal receipts are not required for per diem documentation; however, miscellaneous expenses must be substantiated by receipts. All travel must be reimbursed to the subrecipient in accordance with subrecipients travel policy or these procedures whichever is the most restrictive. Travel reimbursement form must be completed and signed by the traveler and by the approving authority. It is not necessary to have the form notarized.
- b) Out-of-State Travel: State of Alabama Statement of Out-of-State Travel Form shall be used to obtain reimbursement for out-of-state travel. Travel

reimbursement form must be completed and signed by the traveler and by the approving authority. It is not necessary to have the form notarized. The following documentation, as applicable, shall be attached to the request for reimbursement.

- i. Lodging- Individual lodging bills must be attached, showing a "0" balance due.
- ii. Travel- Copies of plane, train, bus tickets, and receipts for parking must be attached. Copies of E-tickets are sufficient if they are accompanied with proof of payment. If utilized, receipts for shuttle/taxi must be attached.

- c) Travel Documentation Form: Subrecipients who utilize an authorized form as required by a unit of local government to obtain reimbursement of travel expenses may substitute that form for the required State of Alabama Statement of Out-of-State Travel Form, provided it requires and includes that documentation required by the State form. Units not having such an authorized form must utilize the State form.

(4) **Foreign Travel** includes any travel outside of Canada, Mexico and the United States and its territories and possessions. Prior written approval from the LETS Division Chief is required for all foreign travel.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at (334) 353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at (334) 353-5639.

OFFICE OF THE GOVERNOR

**KAY IVEY**  
GOVERNOR



ALABAMA DEPARTMENT OF ECONOMIC  
AND COMMUNITY AFFAIRS


**KENNETH W. BOSWELL**  
DIRECTOR

STATE OF ALABAMA

**February 16, 2022**

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 8 (Revision 2)**

**TO: Authorizing Officials and Program Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director**   
**Alabama Department of Economic and Community Affairs**

**SUBJECT: Policy Guide Regarding Signature Certification**

Purpose

The purpose of this policy is to set guidelines for signature certification for all grants and grant related documents that are submitted via mail/email to the Alabama Department of Economic and Community Affairs (ADECA) for active grants prior to October 1, 2021.

Guidelines

Those individuals whose name and signature appears on the certification form or on the grant application, will be authorized to sign/submit reports, requests for payment, and other legal instruments associated with any LETS Division grants. Signatures on grant applications only apply to the LETS Justice Programs Unit and Highway Safety Unit grants.

Subgrant awards should always be signed by the Authorizing Official. In the event the Authorizing Official is unavailable, individuals on the signature certification form are authorized to sign the subgrant award in his/her absence.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.



The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to the subrecipient's program manager, or call 334-242-5897.

KAY IVEY  
GOVERNOR



STATE OF ALABAMA

KENNETH W. BOSWELL  
DIRECTOR

October 1, 2017

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 9**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director  
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding Non-profit Subrecipients

Purpose

The purpose of this policy is to set guidelines for non-profit subrecipients.

Guidelines

- A. **Board of Directors:** All members of the board must have board training.
- (1) New board members must receive board training within 90 days of joining.
  - (2) Board members must receive board training at least biannually.
  - (3) The board chairman/president must be the authorizing official on the subgrant.
- B. **Authorizing Official:**
- 1) The board chairman/president must be the authorizing official for the subgrant.
- C. **Executive Directors:** Each non-profit subrecipient must have a full-time Executive Director (ED).
- (1) The ED may not serve as ED for two separate entities.
  - (2) The ED may not serve as an Interim ED for an agency while working for another entity as a full-time ED.

- (3) Should a subrecipient find itself without an ED, an Interim ED must be put in place.
- a) A board member cannot serve as the Interim ED.
  - b) A board member cannot be hired as the ED until they have been off the board for two years.
- D. Staff from any agency that receives funds from ADECA, may not serve on the board of another ADECA subrecipient, with the exception of serving on the board of the state coalitions.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at 334-353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at 334-353-5639.



**KAY IVEY**  
GOVERNOR



STATE OF ALABAMA

**KENNETH W. BOSWELL**  
DIRECTOR

October 1, 2017

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 10**

**TO: Authorizing Officials and Program Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director**  
**Alabama Department of Economic and Community Affairs**

A handwritten signature in blue ink, appearing to read "Kenneth W. Boswell".

**SUBJECT: Policy Guide Regarding Equipment and Supplies**

Purpose

The purpose of this policy is to set guidelines for equipment and supplies. These guidelines are in addition to those established by federal regulations (specifically, but not limited to, 2 CFR 200.2, 2 CFR 200.33, 2 CFR 200.34, 2 CFR 200.94, 2 CFR 200.313, 2 CFR 200.314).

Guidelines

- A. **Equipment** means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000 for federally funded grants or \$500 for all state funded grants. Acquisition cost means the cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment, for example, means the net invoice price of the equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Acquisition costs for software includes those development costs capitalized in accordance with generally accepted accounting principles (GAAP). Ancillary charges, such as taxes, duty, protective in transit insurance, freight, and installation may be included in or excluded from the acquisition cost in accordance with the non-Federal entity's regular accounting practices.

A physical inventory must be kept of all equipment paid for through grants received by ADECA LETS. Inventory should be taken and then results reconciled at least

annually. A PMU-1 form must be submitted for purchases \$5,000.00 or more. A bill of sale and copy of the title to any vehicle purchased, must be submitted.

- B. **Supplies** means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life.

**Important Note:** Highway Traffic Safety subrecipients cannot purchase furniture or fixtures on any subgrant funded with National Highway Traffic Safety Administration (federal) funds.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at 334-353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at 334-353-5639.



**KAY IVEY**  
GOVERNOR




**KENNETH W. BOSWELL**  
DIRECTOR

**STATE OF ALABAMA**

**September 13, 2022**

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 11 (Revision 2)**

**TO:** Authorizing Officials and Program Directors for ADECA LETS  
Grants

**FROM:** Kenneth W. Boswell, Director   
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding Reporting

Purpose

The purpose of this policy is to set guidelines for subrecipients to provide reports to ADECA LETS. These guidelines are in addition to those established by federal regulations (specifically, but not limited to, 2 CFR 200.327, 2 CFR 200.343).

Guidelines

Unless otherwise directed by ADECA staff, subrecipients are required to submit quarterly narrative and financial reports. Reports must be submitted whether or not any expenditures have been made through the subgrant. Within 60 days after the end of the subgrant or any approved extension (revised end date), subrecipients must submit a final narrative and financial report.

**A. Quarterly Reports:**

- (1) Narrative Reports: Evaluation of the project is important. To enable the project to be monitored and evaluated, a quarterly progress report must be submitted in a timely manner. These reports are prepared in a narrative fashion to present information relevant to the performance of a plan, program, or project. The Subgrant Narrative Progress Report will be used for quarterly reporting. Due to the varied programs and projects administered by LETS, federal program specific reporting forms may also apply. In other words, a report is submitted each quarter; either the Subgrant Narrative Progress Report and/or the federal program specific report form.

- (2) **Financial Reports:** To obtain financial information concerning the use of federal funds, subrecipients must submit timely reports for review. These reports are consistent with the manner of reporting established by 2 CFR Part 200.327. The Subgrant Subrecipient Report will be submitted on a quarterly basis as previously described. The report must be signed by one of the Certified Officials and reflect the actual receipts and expenditures of funds for the period covered. Reported expenditures should be taken from the subrecipients books of account. Human Services Unit programs are excluded from submitting a quarterly fiscal report, as the monthly request for funds provide the necessary financial information.
- (3) **Due Dates of Reports:** Narrative progress reports and financial reports are to be submitted on a calendar quarter basis, regardless of the start date. The following schedule has been established:

<b>REPORT PERIOD</b>	<b>DUE DATE</b>
January 1 through March 31	April 15
April 1 through June 30	July 15
July 1 through September 30	October 15
October 1 through December 31	January 15

- (4) **Monitoring of Report Submissions:** Failure to submit program narrative and/or financial reports in accordance with the schedule may result in the following action being taken by the Program Manager:
- a) If a report has not been received in the office by the 16th day following the end of a calendar quarter, an email will be sent to the project director, and authorizing official, requesting the report.
  - b) If a report has not been received in the office by the 23<sup>rd</sup> day following the end of the calendar quarter, a delinquent notice, along with a follow up e-mail with notice attached, will be mailed to the authorizing official and project director, stating that funds are being withheld until the report is received and that failure to file the report within 15 days, may result in termination of the subgrant.
  - c) If subrecipient progress reports have not been received within 15 days, a letter terminating the subgrant may be mailed to the subrecipient and all remaining funds will lapse and revert to ADECA.

## **B. Closeout Reports:**

- (1) **Final Narrative Report:** The last quarterly report should become a "Final Progress Report" or an "Annual Performance Report" whereby an assessment of the impact of the activities carried out under the subgrant project is made.

- (2) Final Subrecipient Report: A Final Subgrant Subrecipient Report shall be completed, marked as "Final Report", and submitted within sixty (60) days after the subgrant ending date. This report should account for the total ADECA subgrant funds as well as the subrecipient's matching funds that make up the total project cost. The final report shall not be submitted prior to receipt of the final reimbursement payment. The final Request for Funds should be submitted within 30 days after the end of the grant period to allow ADECA sufficient time to process the final reimbursement payment. For the Human Services Unit programs, the last submitted Request for Funds will be the final Subrecipient Report. Where the Final Subrecipient Report or the final Request for Funds reflects expenditure of "Equipment" funds, a listing of Equipment (PMU-5) purchased with project funds are to be attached and submitted therewith. After the 60-day limit, any funds remaining/undrawn will revert to ADECA.

**A. Continuation of Support:**

- (1) Failure of the subrecipient to submit the required financial, programmatic and audit reports to resolve financial issues may result in a suspension of the subgrant payments and may also result in the suspension of processing future applications. These procedures are also applicable if submitted audit reports have unresolved issues.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to the subrecipient's program manager, or call 334-242-5897.

KAY IVEY  
GOVERNOR



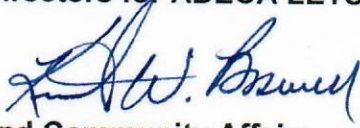
KENNETH W. BOSWELL  
DIRECTOR

STATE OF ALABAMA

October 1, 2017

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 12**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director   
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding New Non-Government Subrecipients

Purpose

The purpose of this policy is to set guidelines for new non-government subrecipients.

Guidelines

**New Subrecipients:** Any agency that does not currently have a grant with ADECA LETS must meet the following qualifications prior to any consideration for funding:

- (1) Must be able to demonstrate an 18 to 36-month history of providing services or demonstrate the capacity to provide services to victims.
- (2) Provide a completed audit or financial statement.
- (3) Provide by-laws, personnel policies and procedures, and financial policies and procedures.
- (4) Must have a full time executive director when applicable.
- (5) Provide documentation that at least twenty-five percent of the agency funds come from non-federal sources.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR



Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at 334-353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at 334-353-5639.

OFFICE OF THE GOVERNOR

**KAY IVEY**  
GOVERNOR



STATE OF ALABAMA

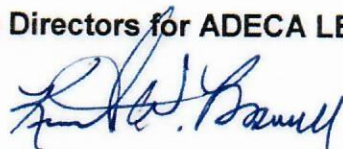
ALABAMA DEPARTMENT OF ECONOMIC  
AND COMMUNITY AFFAIRS

**KENNETH W. BOSWELL**  
DIRECTOR

October 1, 2017

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 13**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director   
Alabama Department of Economic and Community Affairs

**SUBJECT:** Policy Guide Regarding Subrecipient Grant Files

Purpose

The purpose of this policy is to set guidelines for subrecipient grant files.

Guidelines

Subrecipients are required to maintain a subgrant file for each ADECA LETS grant they are awarded.

- A. The subgrant file must be maintained in a central location.
- B. The subgrant file must be a complete file. Each file must contain the following:
  - (1) Grant Application
  - (2) Budget/Budget Narrative
  - (3) Approved Grant Application
  - (4) State of Alabama Disclosure Statement
  - (5) Resolution of Applicant for Matching Funds
  - (6) Subgrant Conditions and Assurances
  - (7) Certification Regarding Debarment
  - (8) Certification Regarding Drug-Free Workplace
  - (9) Non-Supplanting Certification
  - (10) Signed Financial Questionnaire
  - (11) Taxpayer Identification Number (if applicable)

(12) Signed and Dated Acceptance of Award

(13) Release of Funds Letter

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at 334-353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at 334-353-5639.



OFFICE OF THE GOVERNOR

**KAY IVEY**  
GOVERNOR



ALABAMA DEPARTMENT OF ECONOMIC  
AND COMMUNITY AFFAIRS


**KENNETH W. BOSWELL**  
DIRECTOR

STATE OF ALABAMA

**December 15, 2023**

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 14 (Revision 2)**

**TO: Authorizing Officials and Program Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director**   
**Alabama Department of Economic and Community Affairs**

**SUBJECT: Policy Guide Regarding Monitoring of Subgrants**

Purpose

The purpose of this policy is to set guidelines for the monitoring of subgrants.

Guidelines

ADECA monitors subgrants through desk reviews and on-site monitoring visits. Subrecipients may have an on-site monitoring visit at least once every two years, unless a different frequency based on risk assessment is set out in a monitoring plan. On-Site monitoring visits may be conducted through virtual technology under extenuating circumstances as management deems necessary.

Per the Conditions to Subgrant clause regarding access to records, subrecipients will provide all requested documentation to ADECA LETS staff to conduct thorough desk reviews/on-site monitoring visits.

Subrecipients will be expected to follow all applicable state and federal laws/regulations, ADECA policies and all policy letters implemented by the ADECA LETS Division. Subrecipients will be responsible for following their agency's policies and procedures; however, they cannot be less restrictive than the above mentioned.

Subrecipients will have access to the ADECA LETS monitoring tool. It is the responsibility of the subrecipients to ensure their agencies are in compliance with all applicable items within the monitoring tool, including the supplemental tools as applicable.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to the subrecipient's program manager, or call 334-242-5897.

**KAY IVEY**  
GOVERNOR



**KENNETH W. BOSWELL**  
DIRECTOR

STATE OF ALABAMA  
April 25, 2019

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 15 (Revision 2)**

**TO: Authorizing Officials and Program Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director  
Alabama Department of Economic and Community Affairs**

**SUBJECT: Policy Guide Regarding Professional Services (Including Contractors and Consultants)**

**Purpose**

The purpose of this policy is to set guidelines for professional services, including contractors and consultants. These guidelines are in addition to those established by federal regulations (specifically, but not limited to 2 CFR Part 200.317 through 2 CFR Part 200.326).

**Guidelines**

- A. The requirements with respect to arrangement for services with individuals, other government units and non-government organizations are as follows:
- 1) **Arrangements with Individuals must ensure that:**
    - a) Dual compensation is not involved (i.e., the individual may not receive compensation from his regular employer and the retaining subrecipient for work performed during a single period of time even though the services performed benefit both).
    - b) The contractual arrangement is written, formal, proper and otherwise consistent with the subrecipient's usual practices for obtaining such services.
    - c) Time and/or services for which payment will be made and rates of compensation will be supported by adequate documentation.
    - d) Transportation and subsistence costs for travel performed are at an identified rate consistent with the subrecipient's general travel reimbursement practices.
  - 2) **Arrangements with other government units shall ensure that:**



- a) The arrangement is written, formal, proper and consistent with the usual practice and policies of the subrecipient in contracting for or otherwise obtaining services of the type required; and
  - b) The work or services for which reimbursement is claimed must be directly and exclusively devoted to subgrant purposes and charged at rates not in excess of actual costs to the "contractor" government agency.
- 3) **Arrangements with non-government organizations shall ensure that:**
- a) The arrangement is written, formal, proper and consistent with the usual practice and policies of the subrecipient in contracting for or otherwise obtaining services of the type required; and
  - b) The customary fixed fee or profit allowance in cost-type arrangements does not exceed 10 percent of total estimated costs.
- 4) **Compensation** for individual consultant services is to be reasonable, and consistent with that paid for similar services in the market place. Consideration will be given to compensation including fringe benefits for those individuals whose employers do not provide the same. In addition, the policy is that the maximum rate for consultants is \$650 (excluding travel and subsistence costs) for an eight (8) hour day. An eight-hour day may include preparation, evaluation and travel time in addition to the time required for actual performance. A request for compensation for over \$650 a day requires written prior approval and additional justification. The following is the policy regarding compensation of various classifications of consultants who perform like-type services:
- a) **Consultants Associated with Educational Institutions:** The maximum rate of compensation that will be allowed is the consultant's academic salary projected for twelve months, divided by 260. These individuals normally receive fringe benefits which include sick leave for a full 12-month period even though they normally only work nine months per year in their academic positions.
  - b) **Consultants Employed by State and Local Government:** Compensation for these consultants will only be allowed when the unit of government will not provide their services without cost. In these cases, the rate of compensation is not to exceed the daily salary rate paid by the unit of government.
  - c) **Consultants Employed with Profit, Nonprofit and Not-For-Profit Organizations:** These organizations are subject to competitive bidding procedures. Thus, they are not subject to the \$650 per day maximum compensation. In those cases where an individual has authority to consult without employer involvement, the rate of compensation should not exceed the individual's daily salary rate paid by his/her employer subject to the \$650 limitation.
  - d) **Independent Consultants:** The rate of compensation for these individuals must be reasonable and consistent with that paid for similar services in the market place.



- B. Subrecipient should not circumvent the requirements of the above paragraphs regarding arrangements with individual, arrangements with non-government organizations or compensation, by contracting for a fixed product which would not be subject to the professional services fee limitation. This is particularly significant in contracting for the services of individuals. If any of the requirements outlined in this section are not met, prior approval must be obtained from the GRANTOR AGENCY, or ADECA, whichever is applicable.
- C. Limitations: Where an employer-employee relationship exists, personnel are to be considered as employees of the subgrant regardless of the manner in which the employee was hired. Such services are not to be considered as Professional/ Contractual Services.
- D. Time and effort reports must be maintained for consultants.
- E. The Subrecipient must ensure that the contract/consultant maintain records for at least 3 years
- F. The contractual agreement must provide for legal remedies for breach of contract.
- G. The contractual agreement must provide a termination clause
- H. The subrecipient must verify the debarred or suspended status of the contractor/consultant.
- I. Professional/Contractual Services must be procured according to the appropriate policies and procedures.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at 334-353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at 334-353-5639.

OFFICE OF THE GOVERNOR

**KAY IVEY**  
GOVERNOR



ALABAMA DEPARTMENT OF ECONOMIC  
AND COMMUNITY AFFAIRS

**KENNETH W. BOSWELL**  
DIRECTOR

STATE OF ALABAMA

November 19, 2018

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 16**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director *KWB*  
Alabama Department of Economic and Community Affairs

**SUBJECT:** Professional Standards Reviews

Purpose

Program guidance for domestic violence shelters, rape crisis centers and child advocacy centers participating in ADECA federal grant programs to be in compliance with the onsite professional standards review process established by the corresponding state coalition/association.

Guidelines

All domestic violence shelters, rape crisis centers and child advocacy centers that receive funding from the ADECA Law Enforcement and Traffic Safety Division (LETS), are required to be in compliance with the onsite professional standards review process prescribed by the corresponding state coalition/association. If a subrecipient serves as a dual-purpose agency, then that subrecipient must be in compliance with the onsite professional standards review process required by both corresponding state coalitions/associations. Frequency requirements for onsite professional standards reviews will adhere to the guidelines of the appropriate state coalition/association.

The ADECA LETS division does not require subrecipients of federal funds to be members of the various state coalitions/associations. However, if a subrecipient is not a member of their correlating state coalition/association, then the subrecipient must make arrangements with the appropriate coalition/association to have an onsite professional standards review conducted. Any costs associated with such review shall be negotiated between the agency and the state coalition/association and are not eligible for



reimbursement as subgrant expenditures. Any active subrecipient or applicant seeking funds should forward to ADECA LETS a copy of its current professional standards review(s).

ADECA reserves the right to decline funding, withhold subgrant payments or terminate grant agreements of agencies it finds to be non-compliant with this policy. Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to Ms. Aisha Hassan, LETS Human Services Unit Chief, at 334-353-5309 or Mr. Bill Whatley, Public Safety Unit Chief, at 334-353-5639.

**KAY IVEY**  
GOVERNOR




**KENNETH W. BOSWELL**  
DIRECTOR

**STATE OF ALABAMA**

**March 26, 2021**

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 17**

**TO: Authorizing Officials and Program Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director**   
**Alabama Department of Economic and Community Affairs**

**SUBJECT: Additional Conditions for Subrecipients Receiving State Funds**

Purpose

The purpose of this policy is to set additional conditions for those subrecipients receiving state funds.

Guidelines

Subrecipients who receive state funds will be required to be in compliance with the following conditions:

1. Commencement within 60 days: If a project is not operational within 60 days of the original starting date of the subgrant period, the Subrecipient must report by letter to LETS/ADECA the steps taken to initiate the project, the reasons for the delay, and the expected starting date.
2. Operational within 90 days: If a project is not operational within 90 days of the original starting date of the subgrant period, the Subrecipient must submit a second statement to LETS/ADECA explaining the implementation delay. Upon receipt of the 90-day letter, LETS/ADECA may cancel the project and redistribute the funds to other project areas. LETS/ADECA may also, where extenuating circumstances warrant, extend the implementation date of the project past the 90-day period. When this occurs, the appropriate subgrant files and records must so note the extension.
3. Fidelity Bonding: Subrecipients shall be required to carry fidelity bonds for individuals in positions of fiscal responsibility in the amount of \$100,000 or the highest cash advance,

whichever is less. Failure to satisfy this condition shall prompt a request for a refund of subgrant funds.

ADECA reserves the right to decline funding, withhold subgrant payments or terminate grant agreements of agencies it finds to be non-compliant with this policy.

Subrecipients will be expected to follow this Policy Letter, as well as all applicable subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.


The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to the LETS Human Services Unit Chief, at 334-353-5309 or the Public Safety Unit Chief, at 334-353-5639.



July 7, 2021

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 18**

**TO:** Authorizing Officials and Program Directors for ADECA LETS Grants

**FROM:** Kenneth W. Boswell, Director   
Alabama Department of Economic and Community Affairs

**SUBJECT:** Additional Special Condition for Subrecipients Receiving VAWA or SASP programs funding

Purpose

The purpose of this policy is to highlight the requirement that subrecipients at any tier under the Violence Against Women Act (VAWA) or Sexual Assault Services Program (SASP) programs, must have in place or issue a policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence.

Guidelines

Effective with any FY20 or successive fiscal year award, subrecipients at any tier receiving funding from ADECA under the VAWA or SASP programs must have or issue a policy within 270 days of their FY20 award date, to address workplace-related incidents of sexual misconduct, domestic violence, and dating violence involving an employee, volunteer, consultant, or contractor. The details of this requirement are posted on the Office of Violence Against Women (OVW) web site at <https://www.justice.gov/ovw/award-conditions>. Please contact your ADECA Program Manager at 334-242-5897 if you have questions regarding applicability or compliance with this policy.

ADECA reserves the right to decline funding, withhold subgrant payments or terminate grant agreements of agencies it finds to be non-compliant with this policy.

Subrecipients will be monitored for compliance with this Policy Letter, as well as all applicable Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Grant Application Standard Subgrant Conditions and Assurances, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures. Current ADECA LETS policy letters can be found on ADECA's website, at:

<https://adeca.alabama.gov/wp-content/uploads/LETS-Policy-Letters.pdf>.

## Policy on Workplace-Related Sexual Harassment and Domestic Violence

### I. Purpose

The Alabama Department of Economic and Community Affairs (hereinafter, “ADECA”) institutes this policy as part of its commitment to a safer and more supportive organizational climate and to the prevention and reduction of the occurrences and effects of workplace-related incidents of sexual harassment and domestic violence (hereinafter, “violence”). ADECA recognizes violence presents unique issues for its employees, volunteers, consultants, and contractors (hereinafter, “workers”).

Violence can be workplace-related even if incidents occur elsewhere. It crosses economic, educational, cultural, age, gender, racial, and religious lines and occurs in a wide variety of contexts.

The purposes and goals of this policy are to:

- Support a comprehensive workplace education and training program to prevent violence;
- Institutionalize responsive policies and procedures to assist and support workers who are impacted by violence;
- Discipline and hold accountable workers who use violence, which—in certain cases—may include such assistive and supportive measures as requiring counseling; and
- Assure that a worker who uses violence is prohibited from occupying positions that could undermine ADECA’s mission—as well as the missions of the other grantees.

### II. Definitions

- **Adjudication** includes a conviction, issuance of a final protection order, court-ordered diversion, or other judicial finding that the worker has engaged in sexual misconduct or domestic violence.
- **Sexual harassment** means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual’s employment, unreasonably interferes with an individual’s work performance, or creates an intimidating, hostile, or offensive work environment, whether such activity is carried out by a supervisor or by a co-worker, volunteer, or contractor.
- **Domestic violence** occurs when someone commits one of the following offenses against a current or former spouse, parent, step-parent, child, step-child, any person with whom the offender has a child in common, a present household member, or a person who has or had a dating relationship with the offender: assault, stalking, burglary, intimidating a witness,



criminal mischief, menacing, reckless endangerment, criminal coercion, harassment, criminal surveillance, harassing communications, criminal trespass, or arson.

- **Workplace** is broadly defined. An individual is considered to be in the “workplace” of the recipient or subrecipient while in, or using the resources of, the recipient’s or subrecipient’s offices or facilities, using its equipment or vehicles, engaging in approved telework, on work-related travel, or otherwise conducting business on behalf of the recipient or subrecipient. The availability and nature of the response to a workplace-related incident may depend on the location at issue.
- **Workplace-related incidents** of sexual harassment or domestic violence include acts, attempted acts, or threatened acts by or against workers that occur in the workplace or that occur outside the workplace but have an impact on the workplace or otherwise undermine the ability of the recipient or subrecipient to carry out the grant-funded project.

### **III. Persons Covered by this Policy**

Full and part-time employees, volunteers, consultants, and contractors engaged by—or in any location or event controlled or sanctioned by—ADECA, and whose work is funded directly or indirectly by Office on Violence Against Women (OVW) grants, are covered by this policy.

### **IV. Statement of Confidentiality**

ADECA recognizes and respects a worker’s right to privacy and the need for confidentiality and autonomy. ADECA shall maintain the confidentiality of a worker’s disclosure regarding violence to the extent allowed by law, unless to do so would result in physical harm to any person and/or jeopardize safety within any location or event controlled by ADECA.

When information must be disclosed to protect the safety of individuals within any location or event controlled by ADECA, ADECA shall limit the breadth and content of such disclosure to information reasonable necessary to protect the safety of the disclosing workers and others and to comply with the law. ADECA shall provide advance notice to the worker who disclosed information, to the extent possible, if the disclosure must be shared with other parties in order to maintain safety in any location or event controlled by ADECA or elsewhere.

ADECA shall also provide the worker with the name and title of the person to whom ADECA intends to share the worker’s statements and shall explain the necessity and purpose regarding said disclosure.

### **V. ADECA Responses to Violence**

#### **A. Reporting by Workers with Information About Violence**

Workers who have information about or witness an act of violence perpetrated by another worker, or who have information about or witness violence against a worker, are encouraged to report this information to ADECA’s HR Director.



Supervisors who have information about or witness an act of violence perpetrated by another worker or supervisor, or who have information about or witness violence against a worker or supervisor, are required to report this information to the HR Director.

### **B. Responses to Workers Accused of Using Violence**

If ADECA receives information that alleges or suggests that a worker has committed an incident of workplace-related violence, or if any manager or supervisor receives information that any worker has engaged in any incident of workplace-related violence, then the matter shall be referred to the HR Director for the purpose of investigating the information or allegation.

ADECA shall conduct an investigation of the information or allegation, which should be completed within 45 days of receipt of the information or allegation concerning the alleged incident of violence.

Every worker has a duty to cooperate with the investigation, and failure to do so may result in disciplinary action being taken against the uncooperative worker up to and including termination or severance of a contractual relationship. Additionally, every worker has the duty to be truthful and must disclose all information known to the worker when requested to do so by any person designated by ADECA to investigate an alleged incident of violence. Any worker who fails to be completely truthful or who withholds information may be subject to disciplinary action up to and including termination or severance of a contractual relationship.

At the conclusion of the investigation conducted by ADECA, the investigator shall report their findings to the Director of ADECA. If the investigator concludes, by a preponderance of the evidence, that the worker has engaged in a workplace-related incident, then that worker may be subject to disciplinary action up to and including termination or severance of a contractual relationship. The worker may also be required to participate in counseling or other remedial measures.

A worker who is subject to a protection or restraining order, or a named defendant in a criminal action as a result of a threat or act of violence, as defined in this policy, must notify ADECA's HR Director immediately regarding the existence of such criminal or civil action. Failure to disclose the existence of such criminal or civil action in these circumstances may result in disciplinary action, up to and including termination from employment or severance of a contractual relationship.

### **C. Responses to Workers Adjudicated of Using Violence**

In the event that the investigator reports to the Director of ADECA that the worker has engaged in a workplace-related incident, as defined in this policy, or the worker has been found guilty in a criminal action or liable in a civil action arising from a threat or act of violence, as defined in this policy, the Director shall determine whether a continued employment, contractual, or volunteer relationship with the worker would undermine ADECA's ability to carry out OVW grant-funded projects. If the Director determines that a continued employment, contractual, or volunteer

relationship with the worker would undermine ADECA's ability to carry out OVW grant-funded projects, the Director shall remove the worker from any position that may undermine ADECA's ability to carry out OVW grant-funded projects.

ADECA may grant an exception and allow a worker who was previously adjudicated of having used violence by any jurisdiction or previous employer or contractee to occupy a position that could otherwise undermine the ability of ADECA to carry out the OVW funded project, so long as ADECA can establish that the worker has met the following qualifications:

- No survivor of violence used by the worker, nor any family member or friend of a survivor of violence used by the worker, will encounter the worker in any ADECA-controlled capacity;
- The worker evidences accountability, restoration, and rehabilitation; and
- ADECA's mission would benefit from the worker's experience.

All terminations of an employment or contractual relationship with a worker pursuant to this provision, as well as any exception granted pursuant to this provision (including the standards ADECA relied upon in granting an exception), must be reported to OVW.

#### **VI. Reporting by Workers who are Victims/Survivors**

Workers who are surviving violence, and workers who are concerned about coworkers who might be victims, are encouraged to provide a report to ADECA's HR Director, who shall provide community referrals and resources to assist workers with their experiences and concerns.

#### **VII. Reporting Violation of Policy**

A person who wishes to report a violation of this policy should contact ADECA's HR Director or their supervisor. ADECA prohibits retaliation against any person who makes a report under this policy.





OFFICE OF THE GOVERNOR

**KAY IVEY**  
GOVERNOR



STATE OF ALABAMA


ALABAMA DEPARTMENT OF ECONOMIC  
AND COMMUNITY AFFAIRS

**KENNETH W. BOSWELL**  
DIRECTOR

**February 16, 2022**

**Law Enforcement and Traffic Safety Division  
Policy Letter Number 19 (Revision 1)**

**TO: Authorizing Officials and Project Directors for ADECA LETS Grants**

**FROM: Kenneth W. Boswell, Director**   
**Alabama Department of Economic and Community Affairs**

**SUBJECT: Policy Guide Regarding the Use of Electronic Signatures and Submission of Documents Within the State of Alabama's Grant Management System**

**Purpose**

The purpose of this policy is to set guidelines for Subrecipients' use of electronic signatures/approvals and submission of documents within the State of Alabama's grant management system, Alabama Grants ([grants.alabama.gov](http://grants.alabama.gov)).

**Guidelines**

- A. Throughout the various processes within Alabama Grants, there will be a need for electronic signatures.
- 1) The subrecipient must have a policy in place allowing for electronic signatures. The policy should address who is authorized to use electronic signatures.
  - 2) Authorizing Officials and individuals with signature authority are not to share their credentials with anyone. Everyone should have their own login credentials within the system.
  - 3) Authorizing Officials are required to sign grant award documents. Should the authorizing official be unable to sign, a designee may sign the award in their place, if the subrecipient's policies allow for a designee. No one other than the Authorized Officials, or their designee (if permitted by the subrecipient's policies), may sign grant award documents.



- B. Submission of documents, to include but not limited to grant adjustment notices, request for funds, and reports, within Alabama Grants may be completed by any individual within an agency who has the role of "Sub Recipient Admin" in the Alabama Grants system.

Subrecipients will be expected to follow this Policy Letter, as well as all subsequent Policy Letters implemented by the ADECA LETS Division, all applicable state and federal laws/regulations (including, but not limited to, 2 CFR Part 200), ADECA policies, ADECA Subgrant Terms and Conditions, and subrecipient policies and procedures.

The policy letters can be found on ADECA's website, at <http://adeca.alabama.gov/Divisions/lets/Pages/default.aspx>. Any questions, regarding the information contained herein, may be directed to the subrecipient's program manager, or call 334-242-5897.