40947 - Disabled Veterans Transportation

Application Details

Funding Opportunity:	38335-2027-2029 Consolidated Grant Program - Mobility Management
Funding Opportunity Due Date:	Sep 9, 2026 3:01 PM
Program Area:	Consolidated Grant Program
Status:	Under Review
Stage:	Final Application
Initial Submit Date:	Sep 9, 2026 12:51 PM
Initially Submitted By:	Kelli Steele
Last Submit Date:	
Last Submitted By:	

Contact Information

Primary Contact Information

Active User*: Yes

Type: External User

Name: Salutation Kelli (First Name) K (Middle Name) Steele (Last Name)

Title: Director of Housing & Community Service Operations

Email*: Kellis@ccsww.org

Address*: 1918 Everett Ave

Everett (City) Washington (State/Province) 98201-3607 (Postal Code/Zip)

Phone*: (425) 374-6334

Fax: (425) 257-2120

Comments:

Organization Information

Status*: Approved

Legal Name*: Catholic Community Services of Western Washington - Snohomish County

DBA Name*: Catholic Community Services of Snohomish County

Organization Type*: Non Profit

Organization Website: https://ccsww.org/
(Please enter http://... for this field)

Vendor ID: 911585652 3

SAM UEI #: UGEEK4U1JPN1

Physical Address*: 1918 Everett Ave

	Everett Washington 98201-3607 City State/Province Postal Code/Zip
Mailing Address*:	1918 Everett Ave Everett Washington 98201-3607 City State/Province Postal Code/Zip
Remit to Address*:	1918 Everett Ave Everett Washington 98201-3607 City State/Province Postal Code/Zip
Phone*:	(425) 257-2111 Ext.
Fax:	(425) 257-2120
Fiscal Year End Last day of*:	June
Indirect Cost Rate:	15.00%
IDR Expiration Date:	06/30/2025

Organization Contact Information

Organization Contact Information

Organization Director*:	Pearlette Ramos First Name Last Name Regional Director PRamos@ccsww.org Title Email Address
Applicant Contact*:	Kelli Steele First Name Last Name Director of NW Housing & Community Services Operations KelliS@ccsww.org Title Email Address
Project Contact:	Kelli Steele First Name Last Name Director of NW Housing & Community Services Operations KelliS@ccsww.org Title Email Address

Summary of Project Information

Summary of Project Information

Identify whether the project in this application is sustaining, new, or expansion.

Need for Service: Sustain existing service

Expansion can?t be combined with sustaining existing service in the same application for the first biennium.

Capital equipment for a mobility management project includes items that have a useful life of more than one year, exceed your organization?s capital cost threshold or $10,000, and are subject to depreciation and inventory tracking.

Examples for mobility management include information kiosks and technology.

Does your mobility management project include the purchase of capital equipment?*: No

Checking "Yes" for federal funds means that your organization is willing and able to comply with the associated federal requirements, such as federal drug and alcohol testing procedures, Title VI activities, and federal small business enterprise (FSBE) requirements. For examples of federal requirements from last biennium, refer to the Public Transportation Grant Guidebook.

Willing to Accept FTA funds for the biennium?*: Yes

If project is a purchase-of-service type, the eligible funding source and match rate may be affected.

Is this a purchase-of-service project?: No

If your organization has proof of 501(c) nonprofit status, the project may be eligible for state paratransit special needs competitive funds.

Does your organization have 501(c) nonprofit status?: Yes

Choose the congressional district(s), legislative district(s), and county(ies) this project will serve (include the entire project area)
Congressional & Legislative District map

Congressional District(s)
Select as many as apply
***:** 1,2,7

Legislative District(s)
Select as many as apply
***:** 01,10,21,32,38,44

County(ies)
Select as many as apply
***:** Snohomish

Scope of Work

Scope of Work

Select the Regional Transportation Planning Organization (RTPO) / Metropolitan Planning Organization (MPO) that will be ranking this project from the drop-down menu.

RTPO/MPO*: Puget Sound Regional Council

Project Summary (Scope)

Provide a brief, high-level description of what your project proposes to do (address what the project is, whom it serves, and where the service occurs).

WSDOT will use this information to develop the project scope for the grant agreement and may also use it to describe the project to the Legislature.

Proposed summary/scope of work*:

Sustain the Disabled Veterans Transportation program that provides veterans living in Snohomish County with no-cost transportation to medical, dental and other essential appointments.

Project Description

Provide a detailed description of the tasks, activities, and deliverables your project will complete. Your narrative should reflect the full life of the project and demonstrate how the proposed activities align with the grant program?s goals.

Description of project*:

The Disabled Veterans Transportation (DVT) Program provides no-cost transportation for veterans living in Snohomish County who need access to medical, dental, and other essential appointments. The program serves disabled veterans with specialized transportation needs who are not eligible for Medicaid non-emergency transportation, cannot afford alternative transportation options, or live in rural areas where transportation services are limited or unavailable.
Many of the veterans served by the program are older adults living with service-connected disabilities, chronic health conditions, and mobility limitations that make driving impossible or unsafe. Others lack family support or access to reliable public transportation, leaving them with few options for reaching critical healthcare services. Transportation barriers can result in missed medical appointments, delayed treatment, poorer health outcomes, and increased isolation.
Through the dedication of volunteer drivers, the program offers flexible, door-through-door transportation that eliminates financial barriers and reduces lengthy wait times. This service is often the only transportation option available for rural veterans who must travel early in the morning to reach the VA Hospital in Seattle. In addition to supporting access to healthcare, the program helps veterans maintain their independence, improve their quality of life, and remain connected to the services they have earned through their military service.

Project Need

Why is this project needed, and how does this proposal address the need? How would the community be affected if the grant is not awarded?

Include a description of the transportation problem that aligns with the need identified in the Coordinated Public Transit-Human Services Transportation Plan (CPT-

HSTP). Explain how the problem was identified and describe how the proposed project will address it.

Need*:

Disabled veterans in our service area face significant transportation barriers to accessing essential medical care. Many are not eligible for Medicaid non-emergency transportation, cannot afford private transportation options, or live in rural communities where no transportation services are available. Physical limitations, lack of family support, and limited public transit access further increase the risk of missed medical appointments and unmet healthcare needs.

Area Served

Is this project primarily serving a rural area?*: Yes

Any service that supports public transportation in rural areas with populations less than 50,000.

Special Needs Transportation

To be eligible for special needs transportation funding, applicants must address how their project advances the efficiency in, accessibility to, or coordination of transportation services provided to persons with special transportation needs, as defined in RCW 81.66.010(3).

Does this project advance efficiencies in, accessibility to, or coordination of special needs transportation?*: Yes

Describe how your project advances these areas, and the approach you are using to achieve these improvements. Additionally, identify the special needs population(s) to be served by this project.

Special Needs Transportation:

The Disabled Veterans Transportation (DVT) program advances equitable access to healthcare, supportive services, and community resources for veterans who face significant transportation barriers. The project improves mobility and independence by providing door-through-door transportation to medical appointments, behavioral health services, benefits offices, grocery stores, and other essential destinations. Our approach focuses on personalized, volunteer-driven transportation that accommodates the unique needs of each participant, including scheduling flexibility, assistance throughout the transportation process, and service across county lines when specialized care is not available locally. As one of only two volunteer driver programs in Snohomish County-and the only program that transports clients across county lines-DVT reduces travel times, increases access to specialty care, and helps prevent missed appointments and service disruptions.

The primary special needs populations served by this project are disabled veterans experiencing homelessness or housing instability, and disabled veterans living in rural or geographically isolated areas of Snohomish County. Many participants are older adults, individuals with mobility limitations, and veterans with chronic physical or behavioral health conditions who would otherwise have limited or no access to reliable transportation. By removing transportation barriers, DVT helps these vulnerable populations maintain their health, dignity, independence, and overall quality of life.

Project Staff

Provide the names of the key staff who will be working on this project, along with their years of experience and relevant qualifications. Include their experience managing similar projects, with specific attention to responsibilities for grant financial management, budget oversight, documentation, and compliance.

Project Staff*:

Kelli Steele, Director of Housing & Community Services Operations is responsible for grant management of FTA, state and other funds; tracking and approving grant-related expenses; tracking measures and outcomes; compiling grant reports; documenting compliance with state and federal requirements; and overseeing staff. She has been with the agency for 26 years. Geraldine Atwater, Transportation Coordinator, is responsible for taking client calls and scheduling rides; training and managing the volunteer drivers; and keeping the Director informed about sensitive or emergent problems as they arise. She has been with the program for 18 years. Accounting staff monitor the financial requirements of all contracts in close communication with the Director. The agency has continually, successfully managed contracts as evidenced by the excellent contract compliance monitoring reports and the annual audit report.

Relationship to Other Projects

Relationship to Other Projects

Is this project dependent on any other projects submitted by your organization?*: No

Did you, or will you, apply for this project in another grant program this biennium?*: No

Have you applied for the same project in a prior biennium and did not receive funding?*: No

Are you applying for other projects within this funding opportunity?*: No

Planning and Coordination

Coordinated Public Transit - Human Services Transportation Plan

Coordinated Public Transit - Human Services Transportation Plan	Page number(s) or TBD	How is the need in the CPT-HSTP met by this project?

No Data for Table

Cross-region Project

Does this project have a service area that crosses RTPO/MPO planning boundaries?*: No

Project Coordination

Describe coordination efforts. Include details such as:

- How is the project reflected in regional plans?
- Which prioritized strategies are being addressed?
- Who was involved in defining the transportation problem?
- Other alternatives considered for addressing the problem.
- Demonstrations of local/regional coordination in implementing the proposed project.

Coordination Efforts*:

We are active members of the North King County Mobility Coalition and the Homage Senior Companion Advisory Council, where we regularly participate in meetings, share information, and collaborate on strategies to improve transportation access for older adults, individuals with disabilities, and other underserved populations. We also maintain an ongoing partnership with Hopelink to coordinate transportation resources, identify service gaps, and explore opportunities to improve mobility throughout the region. These partnerships enable us to stay informed about available transportation programs, eligibility requirements, and emerging community needs while ensuring that other organizations are aware of the specialized transportation services we provide for disabled veterans. Through these collaborative efforts, we exchange referrals, share best practices, participate in regional planning discussions, and work with other service providers to reduce duplication of services, maximize available resources, and improve access to transportation for those we serve. We continuously seek new opportunities to strengthen coordination and develop partnerships that enhance mobility options within our service area.

By selecting yes, you acknowledge that you coordinated or will coordinate this project with the planning organization(s) within the region(s) this project serves*: Yes

How does your project connect to, coordinate with, leverage, or enhance other modes of transportation in your service area (e.g., aviation, intercity bus or rail, park-and-rides, bicycle/pedestrian)?
In your response, include how the multimodal partnerships for this project will improve or enhance access to social services.
What efficiencies will be gained within the service area as a result of this project?

Multimodal Partnerships*:

Does not apply

Budget

Duration of Project

Duration of Project*: Two Years

Expenses

Expenses	If Other, List the Expense	** July 1, 2025 - June 30, 2027 (Current Estimate)	July 1, 2027 - June 30, 2029 (Projected)	Variance Between Biennia	** July 1, 2029 - June 30, 2031 (Projected)	Variance Between Biennia
Fuel & Lubricants		$8,394.00	$8,497.00	1.23%	$0.00	-100.00%
Labor & Benefits		$16,412.00	$16,886.00	2.89%	$0.00	-100.00%
Rent & Utilities		$5,137.00	$5,301.00	3.19%	$0.00	-100.00%
Project Supplies		$161.00	$337.00	109.32%	$0.00	-100.00%
Other	Telephone & Postage	$393.00	$426.00	8.40%	$0.00	-100.00%
Other	Admin/Indirect	$24,609.00	$4,717.00	-80.83%	$0.00	-100.00%
Other	In kind expenses : Driver hours	$17,516.00	$3,617.00	-79.35%	$0.00	-100.00%
		$72,622.00	**$39,781.00**		**$0.00**	

Sources of Revenue/Match

Revenue/Match Source	If Other, List the Source	** July 1, 2025 - June 30, 2027 (Current Estimate)	July 1, 2027 - June 30, 2029 (Projected)	** July 1, 2029 - June 30, 2031 (Projected)
Local: In-Kind		$17,516.00	$3,617.00	$0.00

Fares and Donations

Row	July 1, 2025 - June 30, 2027 (Current Estimate)	July 1, 2027 - June 30, 2029 (Projected)	July 1, 2029 - June 30, 2031 (Projected)
Fares and rides donations	$0.00	$0.00	$0.00

Variances

Variance between 2025-2027 and 2027-2029: -45.22%

Variance between 2027-2029 and 2029-2031: -100.00%

Variances:

We do expect a minimum of a 5% cost of living increase for all staff. While operating costs have increased in all programs, others have decreased. Also, not all administrative costs are billable but the program still picks up those expenses.

Other Sources and In-Kind Match

Other Sources*:

In addition to WSDOT funding and OAA contract revenue (including Volunteer Services transportation funding and county Older Americans Act funds), the agency may use Associated Organization funds and discretionary contributions to cover budget shortfalls as needed. Monetized in-kind vehicle-hour contributions can be substantially higher but are capped at the amount required to meet budget matching requirements..

Are you using in-kind match?*: Yes

You must provide an in-kind valuation plan in the Attachments section.

Describe the in-kind match:

The In-Kind Valuation plan is attached. It is the number of volunteer vehicle hours times the current federally approved volunteer hour rate equaling the total of the requested WSDOT funds.

Other Support

Other Support:

The agency will continue to pursue and coordinate multiple funding sources beyond WSDOT, maximizing available local, community, and partner resources to support successful project implementation and long-term service delivery.

Budget Development Methodology

Budget development methodology*:

The project budget was developed collaboratively by the Program Director and finance staff using historical program costs, current service levels, anticipated revenue, and projected operational needs. Cost estimates were based on prior-year expenditures, recent purchasing and procurement experience, vendor pricing when available, and trends in service demand. Budget assumptions include routine increases in operating expenses due to inflation, as well as anticipated year-over-year changes in program activity and costs. Each budget line item was evaluated to ensure it is necessary, reasonable, and directly supports the proposed scope of work. The resulting budget aligns available resources with expected service delivery requirements and reflects realistic costs for implementing and sustaining the project.

Summary

July 1, 2027 - June 30, 2029

Total Expenses:	$39,781.00
Match Total:	$3,617.00
Requested Amount:	$36,164.00 This is the amount of grant funds your organization is requesting from July 1, 2027 - June 30, 2029
Percentage of Match:	9.09%

July 1, 2029 - June 30, 2031

Total Expenses:	$0.00
Match Total:	$0.00
Requested Amount:	$0.00 This is the amount of grant funds your organization is requesting from July 1, 2029 - June 30, 2031
Percentage of Match:	0.00%

Indirect Costs

Indirect Costs

Are you charging indirect costs to this grant/project?*: Yes

Select the method your organization uses to apply indirect costs to this project.

Method*: Cost allocation plan (CAP)

Measurable Outcomes

Measurable Outcomes

For mobility management, summarize the intended outputs of this project in both quantitative (statistical) and qualitative (narrative) formats.

There may be some projects where traditional performance measures (e.g., revenue vehicle hours/miles, passenger trips) do not apply.
In those cases, quantitative objectives can be used instead by submitting the following information: the number of trainings conducted, outreach events completed, passengers served, or other measurable outcomes generated by this project.

Identify the data sources and monitoring processes you will use to track these outcomes.

Be sure to include a quantitative output, as this will serve as the baseline measurement for your next biennium application. Qualitative measures are optional.

Intended Outputs*:

Intended Outputs (Quantitative): For the next biennium, CCS expects to maintain and expand mobility management services for disabled veterans by recruiting and supporting volunteer drivers, providing transportation assistance, and increasing access to essential services. Based on current performance, anticipated outputs include approximately 20-25 active volunteer drivers, 1,200-1,300 volunteer service hours, 300-350 one-way passenger trips, 24,000-25,000 miles of transportation service, and service to at least 25-30 unduplicated disabled veteran clients annually.

Intended Outputs (Qualitative): The project will improve mobility, independence, and quality of life for disabled veterans by providing reliable transportation to medical appointments, grocery stores, food banks, banking services, and other essential destinations. The program also seeks to reduce transportation barriers, support community integration, and strengthen access to healthcare and basic needs for individuals with mobility and accessibility challenges.

Data Sources and Monitoring Processes: CCS will track outcomes through volunteer driver logs, trip scheduling and dispatch records, mileage reports, client enrollment records, and monthly program activity reports. Staff will monitor the number of active volunteers, volunteer hours, passenger trips, miles traveled, and unduplicated clients served on an ongoing basis. Data will be reviewed monthly and summarized annually to evaluate program performance, identify service trends, and establish baseline measurements for future biennium applications. Special attention will be given to volunteer recruitment and retention efforts, as volunteer availability remains the primary factor affecting service levels.

How will your organization measure whether the project is successful?

Describe the steps you will take to improve performance if your project does not meet the identified performance targets.

Project Success Measurement*:

Project success will be measured through monthly program reports and an annual participant survey. Key performance indicators include the number of veterans served, access to basic needs and services, changes in self-reported health status, reductions in feelings of isolation, and increased ability to engage with community resources while maintaining independence. Participant feedback, including survey responses and comments, will be used to assess the effectiveness of volunteer support services, particularly transportation assistance.

If performance targets are not met, the organization will conduct a review of program data, participant feedback, and service delivery processes to identify gaps and barriers. Staff and volunteers will receive additional training and support as needed, and outreach, scheduling, or service coordination strategies will be adjusted to better meet participant needs. Progress will be monitored through ongoing reporting, and corrective actions will be implemented and evaluated to ensure continuous improvement and achievement of program goals.

Milestones

Readiness to Proceed

Will your project be ready to proceed at the start of the biennium?*: Yes

Milestones

Activities	Date (mm/yy)
Project Start	07/27
Project Complete	06/29

Supplemental Information

Supplemental Information

Supplemental Information:

Vulnerable Populations in Overburdened Communities & Tribes

Vulnerable Populations in Overburdened Communities

Identify the type of direct and meaningful benefits your project provides to vulnerable populations using the descriptions above, if applicable. Explain how your project delivers these benefits and the impact it will have on the populations served.

Vulnerable Populations in Overburdened Communities*:

CCS' Disabled Veterans Transportation program's direct and meaningful benefits to this vulnerable populations include:
1. Improved Access to Essential Healthcare
Provides transportation to medical, dental, and mental health appointments, helping disabled veterans receive critical care that they might otherwise be unable to access.
Enables access to specialists located outside rural communities, including in Seattle, Bellevue, and Mount Vernon.
2. Reduced Transportation Barriers for Rural Residents
Serves veterans living in rural and hard-to-reach areas such as Arlington, Darrington, Gold Bar, Granite Falls, Stanwood, Sultan, Index, and

Monroe.
Addresses geographic isolation by providing transportation where few or no alternative services exist.
3. Increased Health and Wellness Outcomes
Supports ongoing treatment, preventive care, and management of chronic conditions by ensuring reliable transportation to appointments.
Helps veterans maintain their physical and mental well-being through consistent access to healthcare services.
4. Enhanced Independence, Security, and Dignity
Allows disabled veterans to maintain independence and access necessary services without relying solely on family or friends.
Promotes dignity and respect by providing door-through-door transportation and personalized support.
5. Support for Historically Underserved Populations
Reaches vulnerable populations, including BIPOC community members, who represented 20% of clients served during the reporting period.
Focuses resources on individuals facing multiple barriers related to disability, income, race, geography, and access to services.
6. Increased Social Connection and Community Support
Volunteer drivers provide more than transportation; they help reduce isolation by creating meaningful human connections with clients.
Connects veterans to broader healthcare and support networks within their communities.
7. Environmental Benefits that Support Community Health
Ride-sharing and coordinated transpor

If these populations were engaged by you or your representatives in developing or maintaining the project, describe the outreach efforts and results. Include details such as methods used to engage the community, feedback received, and how the input influenced the project?s design or implementation.

Inclusive outreach in planning:

Outreach efforts were coordinated through established community partnerships with organizations including Homage, the North King County Mobility Coalition, and Snohomish County Catholic Parishes, as well as through targeted social media engagement. The Volunteer Coordinator developed recruitment materials using CANVA and promoted volunteer opportunities through Idealist and other online platforms to reach a broad and diverse audience. These efforts increased awareness of the project, expanded volunteer recruitment, and provided opportunities for community members and partner organizations to share feedback regarding local needs and service gaps. Input received through partner conversations and community engagement helped inform outreach strategies, refine recruitment approaches, and strengthen project implementation by ensuring services and volunteer opportunities were aligned with the needs of the populations being served.

Tribal Support

Is this project directly operated by a tribe?*: No

Is your project serving and is it supported by a tribal nation in Washington?: No

Environmental Justice

Environmental Justice Assessment (EJA)

You must conduct an Environmental Justice Assessment (EJA) if you apply for $15 million or more in grant funds.

Are you requesting $15 million or more in WSDOT funds for your proposed project?*: No

Attachments

Attachments

Named Attachment	Required	Description	File Name	Type	Size	Upload Date
Required for all projects						
Population density map	✔	Population Density Map - Snohomish County	Population Density Map.pdf	pdf	97 KB	09/09/2026 09:20 AM
Service area map	✔	Service Area Map - CCS Disabled Veterans Transportation Program	Service Area Map.pdf	pdf	135 KB	09/09/2026 09:21 AM
Required for new nonprofit applicants only						
501(c) IRS Letter of Determination		501c3 letter	2025 IRS Group Ruling Letter.pdf	pdf	65 KB	09/09/2026 09:25 AM

WA Utilities & Transportation Commission (UTC) Certification (required for new nonprofit applicants that are direct service providers)					
Conditionally required					
Indirect costs documentation - de minimis rate self-certification; negotiated indirect cost rate letter from cognizant agency, or a cost allocation plan	CCS Indirect Cost Allocation Plan	Indirect Cost Allocation Plan 1.docx	docx	77 KB	09/09/2026 09:29 AM
In-kind match valuation proposal (required for operating & mobility management projects that are proposing to use in-kind as matching funds)	In Kind Valuation Plan	In Kind Valuation Plan_CCS.pdf	pdf	32 KB	09/09/2026 12:49 PM
Procurement policy (required for new applicants or existing grantees without a current policy on file with WSDOT if this project includes the procurement of services or capital assets)	CCS Federal Contract Compliance and Procurement Policy	POLICY - Federal Contract Compliance and Procurement Policy 03.02.2023.pdf	pdf	388 KB	09/09/2026 09:30 AM
Correspondence from a tribe in support of your project (if project is serving and supported by tribe(s). Not required if the applicant is a tribe.)					
Optional attachments					
Letters committing matching funds					
Letter of concurrence (for projects that operate in multiple planning regions)					
Letters of support (combine into one file attachment)	Letters of Support from RSVP and Homage	Letters of Support.pdf	pdf	76 KB	09/09/2026 09:33 AM
Supplemental information					
Optional construction attachments					
NEPA/SEPA assessment, if available					
Supplemental construction project information (building or site designs, site plans, location exhibits, etc.), if available					

Certification

Certification

I certify, to the best of my knowledge, that the information in this application is true and accurate and that this organization has the necessary fiscal, data collection, and managerial capabilities to implement and manage the project associated with this application:

Certification*: Yes

Application Authority*: Pearlette (First Name) Ramos (Last Name)

Title*: Regional Director

Date*: 09/09/2026

CATHOLIC COMMUNITY SERVICES
OF WESTERN WASHINGTON

FEDERAL CONTRACT COMPLIANCE AND PROCUREMENT POLICIES AND PROCEDURES

Updated March 2, 2023

Contents

SECTION I – COMPLIANCE

1. OVERVIEW

This Compliance Policy applies to all CCS operational activities and administrative actions and is intended to cover all areas of federal compliance to which CCS is subject. Some CCS programs (e.g., Family Behavioral Health System) have more specific compliance policies due to the nature of their work. In those situations, the Clinical Director should discuss a program's compliance requirements with the CO. The CO will determine whether or not program policies supersede these policies.

With this policy, CCS will seek to prevent and detect fraud, fiscal mismanagement, and misappropriation of funds. In addition, this policy describes a formal compliance program to ensure ongoing monitoring and compliance with all legal and regulatory requirements. The procedures and standards of conduct contained in this policy are intended to generally define the scope of conduct which the policy is intended to cover and are not to be considered as all inclusive.

This policy is intended to:

- Prevent accidental and intentional noncompliance with applicable laws;
- Detect such noncompliance as it occurs;
- Discipline those involved in noncompliance behavior as appropriate;
- Remedy the effects of noncompliance; and
- Prevent future noncompliance.

2. ADMINISTRATIVE RESPONSIBILTY

A. **CCSWW Compliance Officer**

1. The CCSWW Chief of Operations will be responsible for the CCSWW Compliance Program and fulfill the role of CCSWW Compliance Officer.
2. The CCSWW Compliance Officer (hereafter "CO") will chair the CCSWW Compliance Committee. The Clinical Oversight Group (COG) will function as the Compliance Committee.
3. The CO will provide support and assistance to Program/Agency/System leadership in managing the compliance requirements related to contract management. These include but are not limited to:
    i. Complete a template which alerts Program Managers to items they need to address to be in compliance with the contract;
    ii. Provide program managers with information about which requirements are being managed by other parts of the organization;
    iii. Maintain tools in the Supervisor's Toolbox on Public Folders which will assist Program Managers in the area of contract compliance. These tools will include definitions/information on certain requirements contained in most federal contracts and tips to help managers meet these requirements; and
    iv. Develop and provide training to Program Managers on contract compliance.
4. The CO will work with Program Managers and other agency/system leadership on any major compliance issues related to implementing requirements specific to each contract.
5. The CO will receive and review instances of suspected compliance issues, communicate findings, and review action plans with the program involved. The CO also reviews these situations with the Contract Compliance Committee (Clinical Oversight Group).
6. The CO will maintain a log of reported compliance concerns. These include:
    i. The compliance issue reported;
    ii. Indication if sufficient information was received to investigate;
    iii. Information regarding the affected programs;
    iv. Indication of development of a preventive or corrective action plan; and
    v. The resolution.

7. In conjunction with the Compliance Committee, the CO develops the annual compliance work plan.
8. The CO will prepare an annual update regarding compliance issues as part of the Annual Risk Assessment provided to the President's Cabinet and the Board of Trustees.

B. **Clinical Oversight Group**

1. The Clinical Oversight Group (COG) will serve as the Contract Compliance Committee and meet at least twice a year to review compliance related issues.
2. The COG will work with the CO on the development of an annual compliance work plan.
3. The COG will perform the following functions in conjunction with the CO in the area of contract compliance:
    i. Develop, implement, and monitor internal systems to carry out contract compliance standards, policies and procedures;
    ii. Determine the appropriate strategy and approach to promote compliance and detection of potential risk areas through various reporting mechanisms;
    iii. Review suspected issues of non-compliance with the CCSWW Contract Compliance Officer and determine appropriate corrective action plans which address not only the current situation but will prevent future incidents as well;
    iv. Develop corrective action plans to identify, correct, and prevent future incidents of noncompliance;
    v. Develop a system to solicit, evaluate, and respond to complaints and problems;
    vi. Monitor findings of internal and external reviewing bodies for the purpose of identifying risk areas or deficiencies requiring preventive and corrective action; and
    vii. Develop appropriate staff training plans and educational materials and establish mechanisms to notify employees of changes in laws, regulations, and/or policies to assure continued compliance.

C. **Chief Financial Officer**

1. The Chief Financial Officer will act as the Compliance Officer for all financial management compliance issues related to federal contracts.
2. The Chief Financial Officer will work with the CO on the development of an annual compliance work plan.
3. The Chief Financial Officer will perform the following functions in the area of contract compliance:
    i. Develop, implement, and monitor internal financial systems to carry out contract compliance standards, policies, and procedures;
    ii. Determine the appropriate strategy and approach to promote financial compliance and detection of potential risk areas through various reporting mechanisms;
    iii. Review suspected issues of financial non-compliance and determine appropriate corrective action plans which address not only the current situation but will prevent future incidents as well;
    iv. Develop corrective action plans to identify, correct, and prevent future incidents of financial noncompliance;
    v. Develop a system to solicit, evaluate, and respond to complaints and problems related to financial compliance;
    vi. Monitor findings of internal and external reviewing bodies for the purpose of identifying financial risk areas or deficiencies requiring preventive and corrective action; and,
    vii. Develop appropriate staff training plans and educational materials, and establish mechanisms to notify employees of changes in financial laws, regulations, and/or policies to assure continued compliance.

D. **Program Managers**

1. Program Managers are responsible for contract compliance within their program(s).
2. Program Managers should become familiar with compliance requirements that are managed by the organization but might be referred to in their specific contract. These are located in Public Folders under Supervisor's Tool Box. Program Managers are not responsible for any of the rules and regulations noted there. Other parts of the organization, e.g., Human Resources, etc. have responsibility for these requirements on behalf of the whole organization.

3. Program Managers are responsible for reviewing and understanding their contracts prior to submission to the Contract Review Process. Program Managers will review the compliance requirements posted in the Federal Register for the CFDA # identified in the contract.
4. Program Managers will pursue the detection and prevention of noncompliance, fraud, and abuse through the following activities:
   i. Review of financial information;
   ii. Review of MIS data reports;
   iii. Review of time sheets; and
   iv. Review of complaints.
5. All issues of non-compliance will be reported immediately to Agency/System leadership and the Chief Financial Officer.

E. **Agency-wide Compliance Requirements**

Many compliance issues relate to infrastructure policies and procedures. These will be handled by the department responsible even though the requirement is in the program contract. Examples of this include Human Resources, IT, Advocacy, Website, Environmental, and Safety Policies and Procedures.

Questions regarding whether or not a requirement is program based or agency wide will be directed to the CCSWW Compliance Officer.

3. INTEGRATION WITH THE QUALITY IMPROVEMENT PROCESS

As part of CCS' Quality Improvement (QI) process, contract compliance 'check in' conversations for Family Center programs shall occur twice a year between Program Directors and Agency leadership. The outcomes of these conversations are noted in each Agency's Quarterly QI Report and reviewed by both the CCSWW QI Committee and the COG. If there are any financial concerns or issues which arise during these conversations, they will be referred to the Regional Director of Finance. The issues covered are as follows:

- Name of program.
- Number of contracts.
- Number of files being reviewed by program director and frequency.
- Discussion of items being tracked in various contracts including both administrative and service related (i.e., contract deliverables).
- How is staff tracking service-related items and contract or program outcomes?
- Discussion regarding documentation of tracking.
- How is Program Director tracking what staff is doing?
- How often are they tracking it?
- How is this process being documented?
- What are the requirements in program contracts regarding terminating access to third-party portals for employees leaving the agency? Are you informing the CCS Data Steward as part of this process? If not, please incorporate this into your process. Discussion regarding the ability to meet these requirements. If this is not working, what kind of process should be implemented?
- Does Program Director need any assistance with contract compliance?

Specifically, for Federal Contracts:

- Do you have any federal contracts?
- Discussion of program compliance worksheet from CCSWW and confirmation that issues outlined are being addressed and staff responsible for each item are fully trained in managing that area of compliance.
- Have you ever had any audit findings on any of your federal contracts? Have findings been fully addressed? If so, how?
- Review CFDA #'s and the requirements that go with each number.
- Other

4. REPORTING COMPLIANCE ISSUES

Employees are encouraged to report any compliance or fraud and abuse concerns to their supervisor or Agency/System Leader. Employees may also report concerns on the 24-hour Employee Hotline at 1-877-207-3326. Employees who report compliance issues to management in good faith will not be subject to retaliation or harassment as a result of the report.

5. INVESTIGATING COMPLIANCE ISSUES

Upon notification of a suspected instance of non-compliance, the Agency/System Director, Clinical Director and CCSWW Contract Compliance Officer will develop an appropriate process to address the issue. The Investigation Protocol under Service Policies and Procedures can be used as a model in developing the appropriate process.

The outcome of the process will be reviewed by the Agency/System Director, Clinical Director and CCSWW Contract Compliance Officer who will determine what, if any, corrective action should be implemented and whether or not any funders or other government entities need to be notified.

6. DEVELOPING CORRECTIVE ACTION PLANS

As noted above, it will be determined at the conclusion of an investigation whether or not a Corrective Action Plan is to be implemented. If it is necessary to implement a Corrective Action Plan this will be done by the Agency/System leader, Clinical Director and CO. Any Corrective Action Plan is designed to ensure that the specific violation is addressed and, to the extent possible, that similar problems do not occur elsewhere in the organization. Corrective Action Plans may include but are not limited to the following: provision of training; reassignment of duties or functions; personnel action; terminating contractual relationships; repayment and disclosure to external bodies including oversight bodies, funders, and/or appropriate governmental agencies.

SECTION II – PROCUREMENT

1. PURPOSE OF PROCUREMENT STANDARDS

The purpose of these standards is to establish procedures for CCS for the procurement of supplies and other expendable property, equipment, real property, and services. These standards apply to all such procurements. On a case-by-case basis, to the extent consistent with law and funding requirements, the President can waive these requirements on a prospective or retrospective basis.

2. CODE OF CONDUCT

No employee, officer, or agent shall participate in the selection, award, or administration of a contract if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, agent, or any member of their immediate family, their partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from the firm considered for a contract.

The officers, employees, and agents of CCS must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to contracts except where the gift is an unsolicited item of nominal value. For purposes of this policy, nominal value is $25 per item or $75 in aggregate on an annual basis.

Members of the CCS Board of Directors shall comply with all relevant fiduciary duties, including those governing conflicts of interest, when they vote upon matters related to procurement contracts in which they have a direct or indirect financial or personal interest.

Officers, employees, directors, and agents of the Corporation will be subject to disciplinary action for violations of these standards.

3. COMPETITION

All procurement transactions must be conducted in a manner to provide, to the maximum extent practical, open and free competition. Awards shall be made to the bidder or offeror whose bid or offer is responsive to the solicitation and is most advantageous to CCS when considering price, quality and other factors. Any and all bids or offers may be rejected when it is in CCS's interest to do so.

CCS shall be alert to organizational conflicts of interest as well as noncompetitive practices among contractors that may restrict or eliminate competition or otherwise restrain trade. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, invitations for bids and/or requests for proposals shall be excluded from competing for such procurements.

Solicitations shall clearly set forth all requirements that the bidder or offeror shall fulfill in order for the bid or offer to be evaluated by CCS. In all procurement, CCS shall avoid practices that are restrictive of competition. These include but are not limited to:

A. Placing unreasonable requirements on firms in order for them to qualify to do business;

B. Requiring unnecessary experience and excessive bonding;

C. Noncompetitive pricing practices between firms or between affiliated companies;

D. Noncompetitive awards to consultants that are on retainer contracts;

E. Organizational conflicts of interest; if there are parent, affiliate, or subsidiary organizations that are not a state or local government, or an Indian tribe, CCS must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, CCS is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization;

F. Specifying only a brand-name product instead of allowing an equal product to be offered and describing the performance or other relevant requirements of the procurement; and

G. Any arbitrary action in the procurement process.

4. METHODS OF PROCUREMENT TO BE FOLLOWED:

There are three levels of procurement requirements within CCS. They fall into the following categories:

1. Purchases under $10,000;
2. Purchases from $10,000 up to $250,000;
3. Purchases $250,000 or greater.

The methods of procurement for each of these categories are outlined below:

A. Purchases under $10,000**:** Procurement by micro-purchases. Procurement by micro purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed $10,000 (or $2,000 in the case of acquisitions for construction subject to the Davis-Bacon Act). To the extent practicable, CCS must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if CCS considers the price to be reasonable.

B. Purchases from $10,000 up to $250,000**:** Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the "Simplified Acquisition Threshold" as defined under the Federal Acquisition Regulation (“FAR”) (currently set at $250,000) and where procurement by sealed bid is not required. If small purchase procedures are used, then price or rate quotations shall be solicited from a minimum of 3 qualified sources and obtained from no less than 2 qualified sources to ensure that the selection process is competitive and the price is reasonable in accordance with these policies. A price reasonableness determination may be accomplished in various ways, including the comparison of price quotations submitted, market prices and similar indicia (such as a vendor price list on website, or generated from an online search).

C. Purchases exceeding $250,000**:** Procurement by Formal Procurement Methods. CCS must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications.

D. The sealed bid method is the preferred method for procuring construction if conditions below are present:

   1. Bids are publicly solicited, and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price.
   2. A complete, adequate, and realistic specification or purchase description is available;
   3. Two or more responsible bidders are willing and able to compete effectively and for the business; and,
   4. The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

E. If sealed bids are used, the following requirements apply:

1. The invitation for bids will be publicly advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids;
2. The invitation for bids, which will include any specifications and pertinent attachments, shall define the items or services in order for the bidder to properly respond;
3. All bids will be publicly opened at the time and place prescribed in the invitation for bids;
4. A firm fixed-price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
5. Any or all bids may be rejected if there is a sound documented reason.

F. Procurement by Competitive Proposals:

1. The following procedures will be implemented in procurement by competitive proposals:
   i. Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product, or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offerors must be clearly stated; and,
   ii. Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.
2. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract being awarded. It is generally used when conditions are not appropriate for the use of sealed bids or small purchase procedures. If this method is used, the following requirements apply:
   i. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be honored to the maximum extent practical;
   ii. Proposals must be solicited from an adequate number of qualified sources;
   iii. The Corporation shall evaluate responses to its solicitations and select awardees in accordance the procedures outlined in Section 5 below ("Procurement Procedures");
   iv. Awards must be awarded to the responsible firm whose proposal is most advantageous to the Corporation with price and other factors considered; and,
   v. The Corporation may use the competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. A procurement process where price is not to be used as a stated selection factor can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

G. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.

Procurement by noncompetitive proposals may be used only when one or more of the following circumstances applies:

1. The procurement falls under the micro-purchase threshold;
2. The item is available only from a single source;
3. The public exigency or emergency for the requirement will not permit a delay resulting from

competitive solicitation;

4. The funding source specifically authorizes the use of noncompetitive proposals in response to a written request from us; or
5. After solicitation of a number of sources, competition is determined inadequate.
   i. Cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation of the specific elements of costs and profits, is required.
   ii. When using a noncompetitive process, the Corporation normally would be expected to submit the proposed procurement to the relevant funding source for pre-award.

6. The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.
7. Procurement procedures which will be followed for renewals, expansion and change orders will be determined on a case by case basis by the Chief Financial Officer and the President.

5. PROCUREMENT PROCEDURES

A. All procurements by CCS shall comply, at a minimum, with the requirements of subsections 1., 2., and 3. below:

1. The Corporation avoid purchasing unnecessary items.
2. When procuring small and attractive technology assets (laptops, iPads, smart phones), these assets will be tagged and tracked by the IT department.
3. Where appropriate, an analysis is made of lease and purchase alternatives to determine which would be the most economical and practical procurement.
4. Solicitations for goods and services provide for all of the following.
   i. A clear and accurate description of the technical requirements for the material, product, or service to be procured. In competitive procurements, such a description shall not contain features which unduly restrict competition.
   ii. Requirements which must be fulfilled and all other factors to be used in evaluating proposal submitted in response to solicitations.
   iii. A description, whenever practicable, of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
   iv. When relevant, the specific features of "brand name or equal" descriptions that are to be included in responses submitted to solicitation.
   v. The acceptance, to the extent practicable and economically feasible, of products and services dimensioned in the metric system of measurement.
   vi. Preference, to the extent practicable and economically feasible, for products and services that conserve natural resources and protect the environment and are energy efficient.

B. Positive efforts shall be made by CCS to utilize small businesses, minority-owned firms, women's business enterprises, and certified disadvantaged business enterprises whenever possible. CCS shall take all the following steps to further this goal:

1. Must ensure that small businesses, minority-owned firms, women's business enterprises, and certified disadvantaged business enterprises are used to the fullest extent practicable.
2. Make information on forthcoming opportunities available and arrange time frames for purchases and contracts to encourage and facilitate participation by small businesses, minority-owned firms, women's business enterprises, and certified disadvantaged business enterprises.
3. Consider in the contract process whether firms competing for larger contracts intend to subcontract with small businesses, minority-owned firms, women's business enterprises, and certified disadvantaged business enterprises.
4. Encourage, when practical, contracting with consortiums of small businesses, minority-owned firms, women's business enterprises, and certified disadvantaged business enterprises when a contract is too large for one of these firms to handle individually.
5. Use the services and assistance, as appropriate and practical, of such organizations as the Small

Business Administration, the Department of Commerce's Minority Business Development Agency and the U.S. Department of Transportation's Disadvantaged Business Enterprise Program in the solicitation and utilization of small businesses, minority-owned firms, women's business enterprises, and certified disadvantaged business enterprises.

C. To the extent practicable, CCS will make reasonable efforts to provide a preference for the purchase of goods, products, or materials produced in the United States. CCS procurement personnel will include in contracts funded through its federal awards a clause setting forth a similar preference to apply to subcontracting and/or supplier decisions.

D. The type of procuring instruments used (e.g., fixed price contracts, cost reimbursable contracts, purchase orders, and incentive contracts) shall be determined by CCS but shall be appropriate for the particular procurement and for promoting the best interest of the program or project involved. The "cost-plus-a-percentage-of-cost" or "percentage of construction cost" methods of contracting shall not be used.

E. CCS must ensure that all prequalified lists of persons, forms or products used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competitions. Also, CCS must not unreasonably preclude potential bidders from qualifying for inclusion on such lists during the solicitation period.

F. Contracts shall be made only with responsible contractors who possess the potential ability to perform successfully under the terms and conditions of the proposed procurement. Consideration shall be given to such matters as contractor integrity, record of past performance, financial and technical resources, or accessibility to other necessary resources. CCS must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

G. Debarment and Suspension - No contract shall be made to parties listed on the General Services Administration's List of Parties Excluded from Federal Procurement or Nonprocurement Programs in accordance with E.O.s 12549 and 12689, "Debarment and Suspension." Contractors with awards that exceed the small purchase threshold shall provide the required certification regarding its exclusion status and that of its principal employees.

H. For all RFP procurements using Department of Transportation funds, the following protest procedures will apply. The following procedures are implemented as a matter of internal CCS policy. They shall not be considered guaranteed to disappointed offerors as a matter of implied contractual agreement or otherwise, and in all cases shall be implemented solely in the good faith discretion of CCS.

    1. Any grievance regarding solicitation documents (commonly termed a "pre-award protest"), including evaluation factors and specifications as stated in the solicitation, will be considered in good faith by CCS. All such protests must be submitted to the CCS contract processing POC listed in the solicitation prior to the due date for submission of offers, bids, or quotes. No pre-award protest will be considered unless it is submitted prior to such due date.
    2. Any grievance regarding CCS's selection of a particular vendor under a competitive award (commonly terms a "post-award protest") will be considered in good faith by CCS, consistent with the following parameters:
        i. Protests will only be considered from entities that actually competed in the procurement.
        ii. All post-award protests must be submitted to the CCS contract processing POC listed in the solicitation within 5 days of CCS's award decision. Any grievance not filed by that date may be disregarded by CCS without substantive consideration for the mere fact of its lateness.
        iii. Any such post-award protest must include: (1) a detailed description of the perceived error regarding which objection is made, and (2) a clear statement of the material impact of the perceived error upon the substantive final award decision.
    3. CCS will, in its sole and independent discretion, take reasonable action on any valid post-award protest that impacted the award decision. CCS action may include removing the error at issue then permitting all competing vendors to revise and resubmit "best and final offers." Raising a valid objection to an error occurring in the course of the procurement process generally will not lead directly to award of the contract to the protestor.
    4. CCS will include a brief statement of these protest procedures in solicitation documents for procurements

funded by the Department of Transportation.

6. COST AND PRICE ANALYSIS

A price reasonableness determination, based upon comparison of award price to independent price estimates, other offers, market research (including a price list on a vendor website, or generated via online search engine), or similar available information, shall be documented in the file for every procurement over $10,000.

Formal price or cost analysis shall be conducted and documented in the procurement files in connection with every procurement action above the Simplified Acquisition Threshold (currently set at $250,000). Price analysis may be accomplished in various ways, including the comparison of price quotations submitted, market prices and similar indicia together with discounts. Cost analysis is the review and evaluation of each element of cost to determine reasonableness, allocability and allowability.

7. CEILING PRICE (COST PLUS)

Each contract must set a ceiling price that the contractor exceeds at their own risk.

8. PROCUREMENT RECORDS

Procurement records and files shall include the following at a minimum:

- Rationale for the method of procurement;
- Selection of contract type;
- Contractor selections or rejections;
- The basis for the contract price; and,
- Justification for sole source awards.

9. CONTRACT PROVISIONS

CCS will include, in addition to provisions to define a sound and complete agreement, the following provisions in all contracts for which such provisions are applicable. The following provisions shall also be applied to subcontracts.

A. Contracts in excess of the Simplified Acquisition Threshold shall contain contractual provisions or conditions that allow for administrative, contractual, or legal remedies in instances in which a contractor violates or breaches the contract terms and provide for such remedial actions as may be appropriate.

B. All contracts in excess of $10,000 shall contain suitable provisions for termination by CSS, including the manner by which termination, with and without cause, may be affected.

C. For contracts dealing with construction or facility improvements, CSS shall comply with all requirements imposed by its funding sources (and the government regulations applicable to those funding sources) regarding construction bid guarantees, performance bonds, and payment bonds.

D. For all contracts in excess of the Simplified Acquisition Threshold, CSS shall include a provision to the effect that the Corporation shall have access to any books, documents, papers, and records of the contractor which are directly pertinent to a specific program for the purpose of making audits, examinations, excerpts, and transcriptions.

E. All contracts, including small purchases, awarded by CCS and their contractors where the source of the funds, directly or indirectly, is the federal government, shall contain the following procurement provisions as applicable.

   1. Equal Employment Opportunity - All construction contracts, when funded in whole or part by monies derived from the federal government (either directly or indirectly), shall contain a provision requiring compliance with E.O. 11246, "Equal Employment Opportunity," as amended by E.O. 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and as supplemented by regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."
   2. Davis-Bacon Act, as amended (40 U.S.C. §§ 3141-3148) - **When required by Federal program legislation**, all construction contracts and contracts for facilities work (such as repairs or painting) awarded by the recipients and subrecipients of more than $2000 shall include a provision for compliance with the Davis-Bacon Act and as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards

Provisions Applicable to Contracts Governing Federally Financed and Assisted Construction"). Under this Act, contractors shall be required to pay wages to laborers and mechanics at a rate not less than the minimum wages specified in a wage determination made by the Secretary of Labor. In addition, contractors shall be required to pay wages not less than once a week. The recipient shall place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation and the award of a contract shall be conditioned upon the acceptance of the wage determination. The recipient shall report all suspected or reported violations to the Federal awarding agency.

3. Copeland "Anti-Kickback" Act (18 U.S.C. § 874) – Contracts to which the Davis Bacon Act applies shall include a provision for compliance with the Copeland "Anti-Kickback" Act, as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act provides that each contractor or subrecipient shall be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he is otherwise entitled. The recipient shall report all suspected or reported violations to the Federal awarding agency.
4. Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 3701-) – Contracts in excess of $100,000 to which the Davis Bacon Act applies shall include a provision for compliance with Sections 102 and 107 of the Contract Work Hours and Safety Standards Act, as supplemented by Department of Labor regulations (29 CFR Part 5).
5. Rights to Inventions Made Under a Contract or Agreement - Contracts or agreements for the performance of experimental, developmental, or research work, when funded in whole or part by monies derived from the Federal government (either directly or indirectly), shall provide for the rights of the Federal Government and the recipient in any resulting invention in accordance with 37 CFR Part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements," and any implementing regulations issued by the awarding agency.
6. Clean Air Act (42 U.S.C. § 7401 et seq.) and the Federal Water Pollution Control Act (33 U.S.C. § 1251 et seq.), as amended - Contracts in excess of $150,000, **when funded in whole or part by monies derived from the Federal government** (either directly or indirectly), shall contain a provision that requires the recipient to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act and the Federal Water Pollution Control Act as amended. Violations shall be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).
7. Byrd Anti-Lobbying Amendment (31 U.S.C. § 1352) – All contracts in excess of $100,000, **when funded in whole or part by monies derived from the Federal government** (either directly or indirectly), shall include a certification by the contractor that it (i) has not and will not use Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant, or any other award, and (ii) will disclose any such effort (*i.e.*, lobbying related to the award of a federal grant or contract) with non-Federal funds by filing a Standard Form LLL through CCS. A sample certification clause and sample disclosure form are available at 45 C.F.R. Part 93.
8. As discussed above, all contracts that contemplate possible subcontracting for materials or supplies shall include a clause encouraging the contractor to acquire supplies and materials from United States sources to the extent practicable.

10. PROCUREMENT POLICY LANGUAGE FOR SECTION 889 RESTRICTIONS / COVERED TELECOMMUNICATIONS TECHNOLOGY:

Policy

Consistent with 2 C.F.R. § 200.216 (which implements government-wide statutory restrictions) CCS shall not use federal grant funds to *procure or obtain, or extend any contract to procure or obtain*, telecommunications equipment, services, or systems that *use as a substantial component* of covered telecommunications equipment or services.

Definitions

For purposes of this restriction, “covered telecommunications equipment or services” is defined as follows:

A. For telecommunications equipment used for purposes unrelated to security of government facilities or public safety, it is equipment produced by:

1. Huawei Technologies Company;
2. ZTE Corporation; or
3. The affiliates of either of the above.

B. For telecommunications services or video surveillance services of any kind and/or telecommunications equipment used for purposes related to security of government facilities or public safety, it is equipment produced by or services provided by:

1. Huawei Technologies Company;
2. ZTE Corporation;
3. Hytera Communications Corporation;
4. Hangzhou Hikvision Digital Technology Company;
5. Dahua Technology Company; or
6. The affiliates of any of the above

For purposes of this restriction "telecommunications service" should be broadly construed phone, internet, and cloud server services. 2 C.F.R. § 200.471.

For purposes of this restriction, a "substantial component" is a component necessary to the equipment, service, or system's proper functioning. For equipment and systems, this definition will be more limiting than it will for a service. For example, use of a Huawei cell phone by a consultant would not, in most cases, be a "substantial component" of the contractor's furnished service. By comparison, procurement of a cell phone for an employee that contains Huawei-made components would, in most cases, be a circumstance where the Huawei component was a "substantial component" of the acquired device.

Notwithstanding the above definitions, this restriction does not extend to the following circumstances:

1. A service provided by a contractor that connects to the facilities of a third-party (*i.e.* a party beyond the contractor) where the third-party facilities may be noncompliant with this restriction; or
2. Telecommunications equipment that cannot route or redirect used data traffic or permit visibility into any user data or packets that such equipment transmits or handles.

C. Scope of Application

This restriction applies to the expenditure of federal grant funds. It does not directly impact non-grant-funded purchases.

This restriction limits procurement of certain equipment and services with federal funds. It does not impact personal use of such items, including use of personal devices in a telework capacity.

D. Implementation

Federal awarding agencies have expressed awareness that industry is, as of initial implementation of this restriction, still uncertain of the extent to which covered telecommunication equipment or services are embedded in commercial products. CCS shall implement the following measures to implement this restriction as further market information is developed:

1. Risk Assessment and Mitigation: The Compliance Officer will consult annually with the IT Department to assess high risk contracting areas, *i.e.,* those procurements for which new contracts or contract extension are upcoming in the following 18 months that may implicate this restriction.

   The IT Department shall conduct reasonable in-house research to identify products that are known to contain "covered telecommunication equipment or services" and shall brief the Procurement Department on such products. This list shall be updated no less than annually as companies may react to this limitation (which applies to all federal agencies and federal grantees) by removing offending technology from their supply chains.

The Legal team shall be consulted on any questions of interpretation of this limitation.

E. RFP and Contract Terms for New Contracts: As information will be limited even with IT research support, CCS's procurement personnel shall use terms substantially similar to the following in IT equipment and service procurements:

1. RFP Representation: This procurement is funded in whole or in part with federal funds. Offeror hereby

represents that it will not, in the performance of any contract resulting from this solicitation, provide (directly or by subcontract) any equipment, service or system, that uses, as a substantial component, covered telecommunications equipment or services. "Covered telecommunications equipment" is defined at Section 889 of Public Law 115-232 (Aug. 13, 2018) and 2 C.F.R. § 200.216 to include the equipment and services of Huawei Technology Company and its affiliates as well as that of certain other entities and their affiliates. If needed, CCS will provide a brief written statement of the definition upon request. By submitting an offer, offeror represents that it understands the scope of this limitation as set forth in law and will agree to the following contract term in any resulting contract.

2. Contract Term: *"Contractor is prohibited from providing to CCS any equipment, service or system that uses, as a substantial component, covered telecommunications equipment or services. "Covered telecommunications equipment" is defined at Section 889 of Public Law 115-232 (Aug. 13, 2018) and 2 C.F.R. § 200.216 to include the equipment and services of Huawei Technology Company and its affiliates as well as that of certain other entities and their affiliates. Offeror acknowledges that it was placed on notice of this obligation in the course of the contract negotiation and award process and that it had an adequate opportunity to research its scope. If contractor determines, during the course of performance, that it is out of compliance with this prohibition, it shall promptly notify CCS and replace the noncompliant equipment or service with compliant equipment or services at no additional cost to CCS."*
3. Extension of Existing Contracts: Existing contracts shall not be extended unless the representation provided above is provided by the contractor. Whether the associated contract term is inserted into such contracts shall be a matter of judgment and bargaining power as determined by the Compliance Officer after consideration of the IT Department's risk assessment. Reasonable efforts shall be made to secure the addition of the contract term to such contracts without undue cost to CCS.

11. CONTRACT ADMINISTRATION

A system for contract administration shall be maintained to ensure contractor conformance with the terms, conditions and specifications of the contract and to ensure adequate and timely performance of all contract obligations. CCS shall evaluate contractor performance and document, as appropriate, whether contractors have met the terms, conditions, and specifications of the contract.

SECTION III – GENERAL GUIDELINES FOR ALLOWABILITY OF COSTS

1. GENERAL CRITERIA

There are many factors that affect the allowability of costs. In order to be allowable for allocation to government funded programs, all costs must meet the following general criteria:

A. Be necessary and reasonable for proper and efficient program administration and allocable under these guidelines. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. In determining the reasonableness of a given cost, consideration must be given to:
   - Whether the cost is of a type generally recognized as ordinary and necessary to the operation of the agency or to the performance of the contract.
   - The restraints or requirements imposed by such factors as sound business practices, arms-length bargaining, federal, state, and other laws and regulations, and terms and conditions of the award.
   - The market prices for comparable goods and services for the geographic area.
   - Whether the individuals concerned acted with prudence considering their responsibilities to CCS, its employees, the public at large, and the federal government, and,
   - Whether the non-federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the cost.

B. Be allocable**.** A cost is allocable if it is assignable or chargeable to one or more cost objectives on the basis of relative benefits received or other equitable relationship. A cost is allocable to an award (grant, cooperative agreement, or contract) if it is incurred specifically for the award; benefits both the award and other work and can be distributed between the award and other work in reasonable proportion to the benefits each received; or is necessary to the overall operation of CCS.

C. Be in conformance with any limitations or exclusions set forth in this policy, federal or state laws, specific contract language, or other governing limitations as to types or amounts of cost items.

D. Be consistent with policies, regulations, and procedures that apply uniformly to both contracted activities and to other activities of the agency.

E. Be accorded consistent treatment**.** A cost may not be assigned to a program as a direct cost if any other cost under the same circumstances has been charged to a program as an indirect cost.

F. Be determined in accordance with generally accepted accounting principles (GAAP).

G. **Not be included as a cost or used to meet cost sharing or matching requirements of any other FEDERALLY FINANCED, state, or other agency financed program in either the current or prior period, unless specifically authorized by statute for a particular award.**

H. Be net of all applicable credits. Applicable credits are receipts or reduction of expenditure-type transactions that offset or reduce expense items allocable to programs as direct or indirect costs, including discounts or rebates subsequently received for prior purchases. Agencies are expected to take advantage of available discounts on purchases of goods and services. When applicable credits relate to allowable program costs, they must be credited to the program either as a cost reduction or a cash refund.

I. Be supported by the agency's accounting records and be adequately documented.

2. DIRECT COSTS, ALLOCATED COSTS, AND INDIRECT COSTS

The total cost of a program is comprised of the allowable direct costs' incident to its performance, plus its allocable portion of allocated and indirect costs, less applicable credits, plus any reserves if allowed under contract.

A. DIRECT COSTS

Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a program or contracted activity, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. For example, the entire salary of an individual who spends all of his or her time working on a single program can be charged as a direct cost to that program. Direct costs shall be claimed whenever possible based on the nature of the costs and the accounting system in place.

Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs.

B. ALLOCATED COSTS

Allocated costs are costs that are clearly associated with and can be readily assigned to a function or activity. A cost can directly benefit more than one program or function and can, therefore, be allocated (or charged) to the benefiting programs or functions on some reasonable and equitable basis. For example, an individual spends his or her time working on several different programs that the agency operates. Salary and related fringe benefits can be charged to the respective programs based on the number of hours reported to each program on employee time sheets. (Note: allocation of costs based on approved budget is not an allowable method of cost allocation.)

C. INDIRECT COSTS

Indirect costs are those costs that are incurred by an agency for a common or joint purpose that are not readily chargeable to a particular program or function without effort disproportionate to the results achieved but benefit more than one program or function operated by the agency. Indirect costs are necessary to the overall operation of the agency, but a direct relationship to a specific program cannot be shown. An example of indirect costs includes accounting and human resources costs. Generally, these kinds of costs are identified, pooled, and charged against individual programs or funding sources using a rate designed to recover the costs.

When indirect costs are charged, all activities which benefit from the agency's indirect costs, including unallowable activities and donated services, will receive an appropriate allocation of indirect costs. The basis used shall be an equitable measure of the extent to which the cost incurred actually benefits the program to which it is charged. For example, accounting costs allocated by a calculation based on total expenditures. Costs that are part of the agency indirect cost pool shall not duplicate any costs that are charged directly and shall not include any unallowable costs, and total costs charged may not exceed the actual costs incurred.

Federal regulation requires the federal agency providing the largest dollar value of federal award serve as the cognizant agency for indirect costs and for the negotiation and approval of the indirect cost rates. In addition, non-federal entities that have never received a negotiated indirect cost rate may elect to charge a de-minimis rate of 10% of their modified total direct costs indefinitely. CCS has been awarded a federal indirect rate just for the Northwest Region, the remaining regions and systems use the 10% de-minimis rate for Federal Subrecipient Programs.

3. SELECTED ITEMS OF COSTS

This section provides principles to be applied in establishing the allowability of certain items involved in determining cost. These principles apply whether or not a particular item of cost is properly treated as direct or indirect cost. A transaction or item of cost not specifically mentioned in the policy is not intended to imply that it is either allowable or unallowable; rather, determination as to allowability in each case should be based on the treatment provided for similar or related items of cost and the cost principles in this policy.

In addition to general cost guidelines, CCS is prohibited by law, regulation, and/or contract from paying for certain expenditures. These costs are designated as unallowable costs and should not be charged to CCS programs, either directly or indirectly. Agencies are not prohibited from incurring unallowable costs, but they cannot be recovered under Government contracts.

To manage unallowable costs, separate accounts should be established for these types of expenses. Unallowable costs cannot be made part of expense pools that are applied to contracts through administrative charges, cost allocation plans, or indirect charges. Agencies should include a direct cost pool or category in their chart of accounts for unallowable costs.

For costs to be allowable, they must be reasonable, necessary, and provide a benefit to the program. Costs not directly related to program needs are unallowable.

In general, unallowable agency-related costs include, but are not limited to:

A. ADVERTISING AND PUBLIC RELATIONS

Advertising and public relations costs are generally not allowable except under the instances allowed by federal regulations or contract.

B. ALCOHOLIC BEVERAGES

Costs of alcoholic beverages are unallowable.

C. AUTOMOBILE ALLOWANCES

The use of vehicle allowances does not reflect actual cost. As they are estimates, they are not allowable.

D. AUTOMOBILE COSTS FOR PERSONAL USE

The use of agency owned cars or payment of mileage for personal use, including commuting, is not allowed.

E. BAD DEBTS

Accounts receivables determined to be uncollectable, including losses from uncollectable accounts are unallowable whether actual or estimate.

F. CASH DISBURSEMENTS AND CASH ATM WITHDRAWALS

Checks written to “cash” or ATM cash withdrawals that are merely supported by a withdrawal receipt are not allowable expenses. Further documentation is required to provide justification for an expense charged to a DCF program.

G. CONTRIBUTIONS, DONATIONS, AND GIFTS

See the federal allowable cost guidance for discussion on the allowability of contributions and donations.

H. ENTERTAINMENT

Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose, reasonable, necessary, and are authorized by contract. Questions about specific entertainment costs should be directed to your Contract administrator.

I. FINES, PENALTIES, DAMAGES, AND OTHER SETTLEMENTS

Costs resulting from violations of, alleged violations of, or failure to comply with, federal, state, tribal, local or foreign laws and regulations are unallowable, except when incurred as a result of compliance with specific provisions of the award, or with prior written approval of the Government entity.

J. **FRAUD**

Losses incurred by a provider related to fraud or embezzlement committed by internal or external perpetrators are unallowable costs and may not be charged to CCS programs.

K. **FUND RAISING COSTS**

Cost of organized fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions are unallowable. However, fundraising costs for the purposes of meeting federal program objectives which are reasonable and necessary may be allowable if permitted by contract. Questions about specific fundraising costs should be directed to your Contract Administrator.

L. **GOODWILL**

The write-up of assets, resultant depreciation, and goodwill from business combinations is unallowable.

M. **GOODS AND SERVICES FOR PERSONAL USE**

Costs of goods or services for personal use of employees are unallowable regardless of whether the cost is reported as taxable income to the employees.

N. **INTEREST ON CREDIT CARD ACCOUNTS AND INSTALLMENT LOANS**

Interest expense on credit card accounts and installment loans are not allowable.

O. **INVESTMENT MANAGEMENT COSTS**

Investment management costs are unallowable, except for costs related to the physical custody and control of monies and securities.

P. **LEGAL EXPENSES FOR ADMINISTRATIVE APPEALS, PROSECUTION OF CLAIMS, OR CIVIL OR CRIMINAL ACTIONS**

The cost of legal representation related to claims against CCS, as part of an administrative appeal, or as the result of civil or criminal actions against the agency is generally not an allowable cost.

Q. **LOBBYING/POLITICAL ACTIVITIES**

The costs of certain influencing activities (i.e., attempts to influence the enactment or modification of any pending legislation through communication with any member or employee of the state legislature, or with any government official or employee concerning a decision to sign or veto enrolled legislation) associated with obtaining grants, contracts, cooperative agreements, or loans is unallowable.

R. **LOSSES**

The excess of cost over revenue on any contract or program is unallowable.

S. **MEMBERSHIPS, DUES, AND SUBSCRIPTIONS**

Costs of membership in any country club or social or dining club or organization are unallowable unless specifically approved by the Government entity.

T. **NSF FEES**

Fees assessed for non-sufficient funds checks or drafts, whether returned or not, are unallowable. Agencies are expected to maintain their accounts in a manner that precludes overdrafts from occurring.

U. **OVER LIMIT FEES**

Over limit fees assessed on credit cards are unallowable. Programs are expected to maintain their accounts in a manner that does not incur these types of fees.

V. **PARKING TICKETS**

Fines and penalties include all costs resulting from violations of, or failure to comply with federal, state or local laws and regulations, and contract requirements. Parking tickets are considered a fine and are unallowable.

W. **PERSONAL HOUSING AND LIVING EXPENSES**

The costs related to the personal living expenses of an agency's employees are generally unallowable. This includes but is not limited to: rent, utilities, auto expenses, food, dining, clothing, entertainment, insurance, furniture, and the payment of personal debt.

X. **RECONNECTION CHARGES**

Reconnection charges for utilities, telephone, and Internet or cable service due to failure to pay bills on time is unallowable. Agencies are expected to maintain their accounts in a manner that does not incur these types of fees.

Y. **START-UP COSTS**

Start-up costs apply to new or expanded services only. Start-up costs are unallowable without prior approval from the Government entity.

Z. **TOBACCO PRODUCTS**

The cost of tobacco is expressly unallowable under all circumstances.

AA. **UNDOCUMENTED EXPENSES**

For expenses to be allowable, they must be adequately documented. Expenses that are lacking adequate supporting documentation are unallowable.

While the costs cited above are generally not allowable costs, some common costs incurred by agencies may be allowable, such as:

BB. **AUDIT SERVICES**

Audit expenses are allowable if the audit is required by Federal or State law or regulation. The guidance that will be applicable to a particular agency depends on the contractual requirements of the Government entity.

CC. **CLIENT-RELATED COSTS**

Direct expenditures made on behalf of a client, such as food, entertainment, transportation, and personal goods may be allowable if related to a program objective.

DD. **FEES FOR EMPLOYEE HEALTH AND WELFARE COSTS**

Costs incurred in accordance with the CCS's documented policies for the improvement of working conditions, employer-employee relations, employee health, and employee performance are generally allowable. See the federal regulations for more specific guidance.

EE. **MEMBERSHIPS, DUES, AND SUBSCRIPTIONS**

- Costs of membership in business, technical, and professional organizations are allowable.
- Costs of subscriptions to business, professional, and technical periodicals are allowable.
- Cost of memberships in any civic or community organizations are allowable with prior approval.
- Costs of membership in any country club or social or dining club or organization are unallowable.

CATHOLIC COMMUNITY SERVICES
CATHOLIC HOUSING SERVICES
OF WESTERN WASHINGTON

In-Kind Match Valuation Plan

Catholic Community Services (CCS) utilizes Volunteer Drivers to provide services to the demographic population covered by the grant. The following eligible match items are calculated on a per-grant basis for the grant cycle 07/01/2027 – 06/30/2029.

Donor:	Volunteer
Position:	Volunteer Driver
Work performed:	Demand--response service
Number of hours:	100.08
Per-hour value:	$36.14
Total value:	$3,616.89

TOTAL MATCH AMOUNT: $3,616.89

Signature: ________________ Date: 9/9/26

Homage
Well-being as we age

1715 100th Pl SE
Everett, WA 98208
(T) 425.355.1112

September 2, 2026

To Whom It May Concern,

The Homage Senior Companion Program is honored to be able to partner with Everett Catholic Community Services (CCS) to better support the transportation needs of older adults in Snohomish County.

The CCS Everett office offers a variety of programs in the county to provide support that enables older adults and veterans to stay living at home rather than moving into more expensive living facilities.

Please continue to support these valuable programs at Everett Catholic Community Services.

Sincerely,

Mary Ann Higgins

Homage Senior Companion Program

1715 100th PL SE

Everett, WA 98208

425-355-1138

mhiggins@homage.org

AmeriCorps Seniors

September 3, 2026

To Whom It May Concern,

The Retired and Senior Volunteer Program of Snohomish County (RSVP) supports Catholic Community Services" Veterans Transportation Program. This service increases options and allows access to programs that support Veterans. Many disabled Veterans find it impossible to take a bus to buy groceries when they are unable to carry them. Without transportation, getting to doctors' appointments and other basic needs appointments become major challenges. Transportation service is a vital way of supporting these individuals to live in their own homes with dignity and independence.

RSVP partners with Catholic Community Services by recruiting drivers for the program and often friendships are developed between the driver and Veteran that reduce isolation and can provide a sense of security and in turn, provides volunteers with a rewarding and memorable experience.

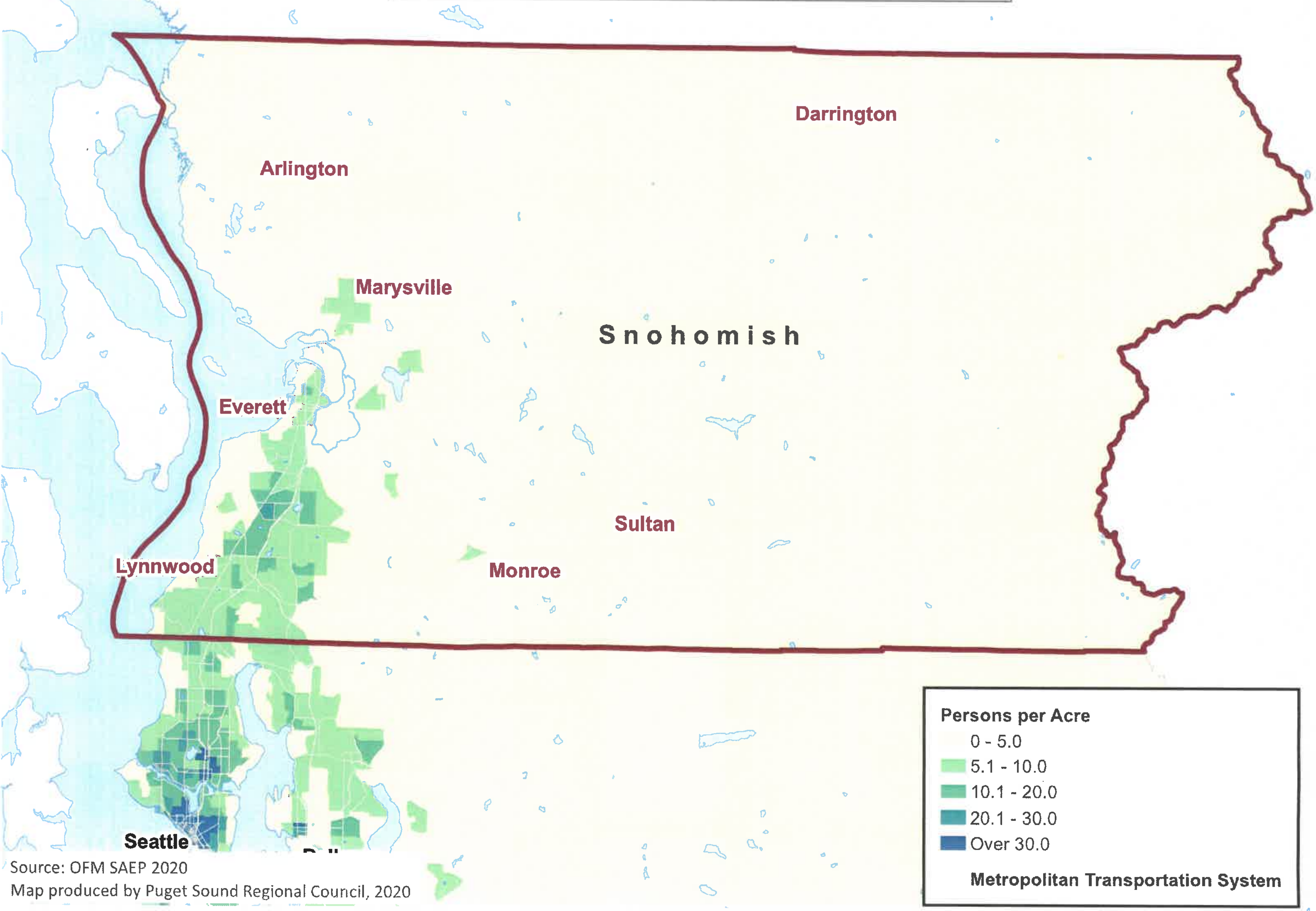
I strongly urge you to continue to support this valuable program.

Sincerely,

Paulette Jacobson

Paulette Jacobson
Director, RSVP of Snohomish County
1918 Everett Avenue
Everett, WA 98201
425-374-6311

Snohomish
Population Density - Persons Per Acre

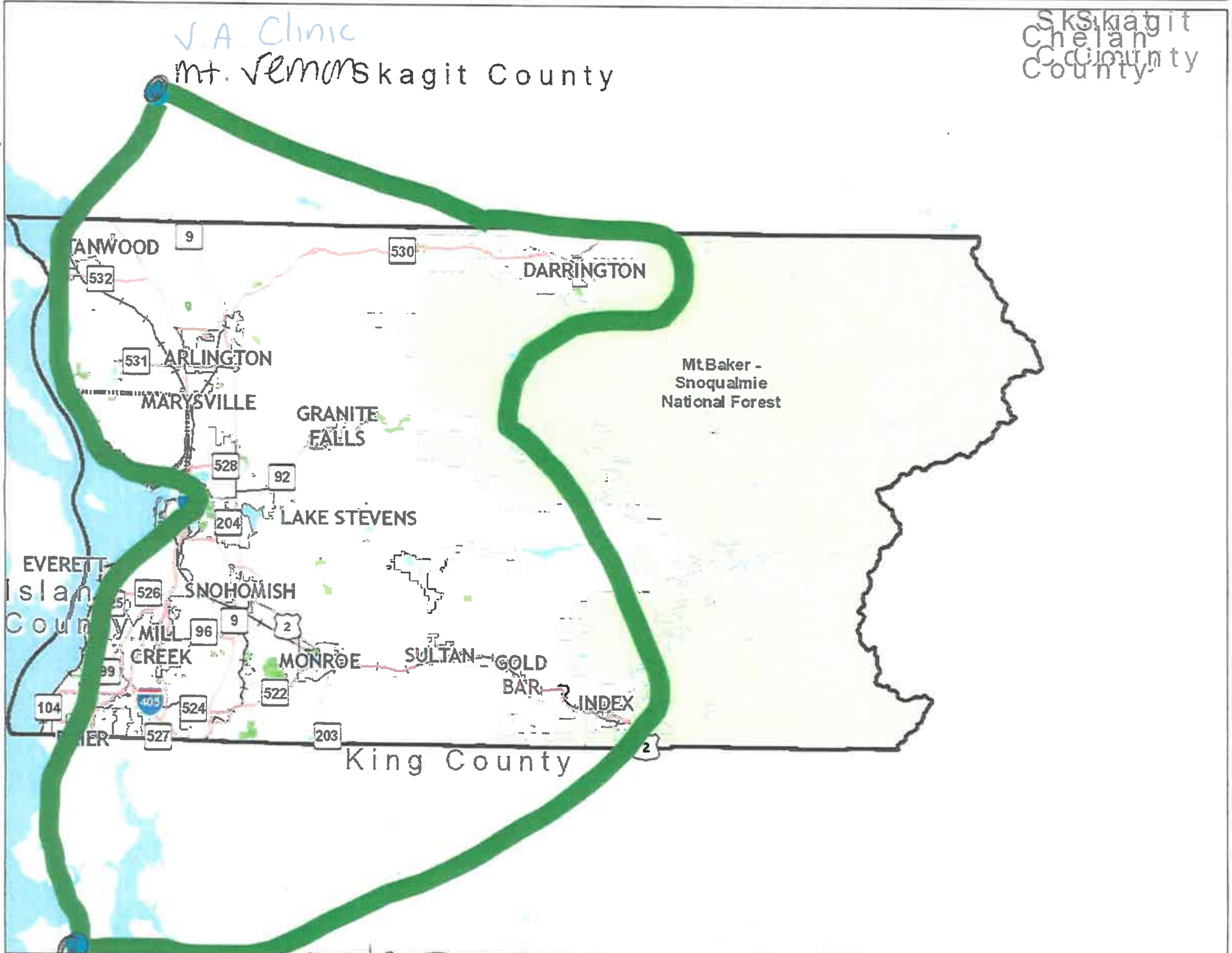


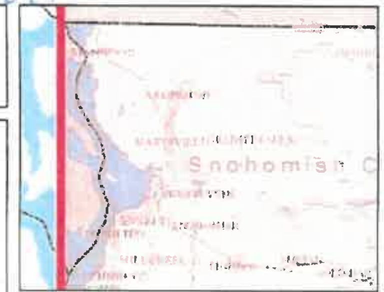
Source: OFM SAEP 2020
Map produced by Puget Sound Regional Council, 2020

Snohomish County, Washington
PDS MAP PORTAL

Map Title = Disabled Veterans Transportation Service Area

9/6/2018





Legend

1: 640,000

106,666.7 0 53,333.33 106,666.7 Feet

Projection: NAD_1983_StatePlane_Washington_North_FIPS_4601_Feet
Planning and Development Services, Snohomish County

Notes

This map was automatically generated using Geocortex Essentials.