

FY 2021 Office on Violence Against Women – Grants to Tribal Governments to Exercise Special Domestic Violence Criminal Jurisdiction

February 17, 2021



National Congress of American Indians Fund
Tribal Law and Policy Institute

www.ncai.org/tribal-vawa

www.tlpi.org

FY 2021 Application Deadlines: (NEW Two Step Process)

March 26, 2021: Grants.gov

March 30, 2021: JustGrants

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Presenters

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Outline of Webinar Presentation

- Two separate solicitations:
 - FY 2021 OVW Grants to Tribal Governments to Exercise Special Domestic Violence Criminal Jurisdiction (SDVCJ) - **Standard**
 - FY 2021 OVW Grants to Tribal Governments to Exercise SDVCJ: Targeted Support for Exercising Tribes Solicitation - **Targeted**
- General Grant Writing Tips
- Questions

What this Webinar will NOT be Covering

- Full range of information and resources needed for a complete OVW application.
 - For more OVW resources, please see <https://www.justice.gov/ovw/open-solicitations>
 - See OVW SDVCJ Pre-Application Webinar PPT
- Full range of federal grant opportunities that could be used to fund VAWA implementation.
- Discussion of VAWA special domestic violence criminal jurisdiction requirements.

Resources available: www.ncai.org/tribal-vawa

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HOME | OVERVIEW | SDVCJ TODAY | GET STARTED | RESOURCES | EVENTS |

  **VAWA 2013 Special Domestic Violence Criminal Jurisdiction**
Tribal Criminal Jurisdiction over Non-Indians

 **VAWA 2013's SDVCJ Five Year Report**
[Read Full Report Here](#)

 **Interested in Implementing VAWA Tribal Provisions?**
[Get Started Here!](#)

 **Interested in Understanding VAWA Tribal Provisions?**
[Learn More!](#)

 **Check Out the Newly Updated SDVCJ Resource Center!**

 **VAWA 2013's SDVCJ Five Year Report**

A Look at VAWA SDVCJ in the First Five Years

[Read Full Report Here](#)

VAWA 2013's SDVCJ Five Year Report

In the five years following the passage of VAWA 2013, 18 tribes began exercising Special Domestic Violence Criminal Jurisdiction. Learn about ...

the-first-5-years/five-year-report-overview

Title IX of the 2013 VAWA Reauthorization

- Section 904: Tribal Jurisdiction over Crimes of Domestic Violence
- “Special Domestic Violence Criminal Jurisdiction” recognizes a tribe’s inherent criminal jurisdiction over **non-Indians** for the crimes of:
 - Domestic Violence
 - Dating Violence
 - Violations of Qualifying Protection Order

Codified at 25 U.S.C. § 1304

Tribes can now exercise Special Domestic Violence Criminal Jurisdiction

- Under VAWA 2013, tribes now have the OPTION to exercise Special Domestic Violence Criminal Jurisdiction (SDVCJ).
- Currently, 27 tribes are exercising SDVCJ:
 - Confederated Tribes of the Umatilla Indian Reservation
 - Pascua Yaqui Tribe
 - Tulalip Tribes
 - Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation
 - Sisseton Wahpeton Oyate of the Lake Traverse Reservation
 - Little Traverse Bay Bands of Odawa Indians
 - Eastern Band of Cherokee
 - Seminole Nation of Oklahoma
 - Nottawaseppi Huron Band of the Potawatomi
 - Standing Rock Sioux Tribe
 - Kickapoo Tribe of Oklahoma
 - Sac and Fox Nation
 - Alabama-Coushatta Tribe of Texas
 - Choctaw Nation
 - Muscogee (Creek) Nation
 - Sault Sainte Marie Tribe of Chippewa Indians
 - Chitimacha Tribe of Louisiana
 - Lower Elwha Klallam Tribe
 - Quinault Indian Nation
 - Cherokee Nation
 - Gila River Indian Community
 - Port Gamble S'Klallam Tribe
 - Confederated Tribes of the Chehalis Reservation
 - Grand Traverse Band of Ottawa & Chippewa Indians
 - Suquamish Tribe
 - Santa Clara Pueblo
 - Swinomish Tribe

This funding can support the following SDVCJ needs:

- Effective assistance of counsel for defendants
- Free, appointed, licensed attorneys for indigent defendants
- Law-trained Judges who are licensed
- Publicly available criminal laws and rules
- Recorded criminal proceedings
- Jury pool selection
- Law enforcement training
- Detention facilities
- Medical insurance/costs for non-Indian detainees
- Probation
- Create a Domestic Violence Court/Docket
- Code Development
 - Domestic Violence Offenses
 - Firearm Offenses
 - Victims' Rights

Comparison of Solicitations

	Standard	Targeted
Use of Funding:	Planning, Implementation and Exercise of SDVCJ	Exercise of SDVCJ
Project Period:	New: 36 months Continuing: 24 months	New: 24 months Continuing: 24 months
Award Amount:	New: \$450,000 Continuing: \$300,000	New: \$200,000* Continuing: \$200,000*
Application Requirements:	- Authority to apply	- SDVCJ certification
Post-Award Requirements:	- MOU/IMOU	

* Can apply for additional funding with adequate justification.

Eligibility

	Exercising		Not Exercising	
	Solicitation	Type	Solicitation	Type
Never received funding	Either	New	Standard	New
2016	Either	New	Standard	New
2017	Either	Continuing	Standard	Continuing
2018	Either	Continuing	Standard	Continuing
2019	Not Eligible			
2020	Not Eligible			

Standard Solicitation		Targeted Solicitation	
New:	\$450,000, 36 months	New:	\$150-200,000, 24 months
Continuing:	\$300,000, 24 months	Continuing:	\$150-200,000, 24 months

OVW FY2021 Grants to Tribal Governments to Exercise Special Domestic Violence Criminal Jurisdiction Solicitation

“Standard”
Planning, Implementation, and
Exercise of SDVCJ

Overview of Grant Program

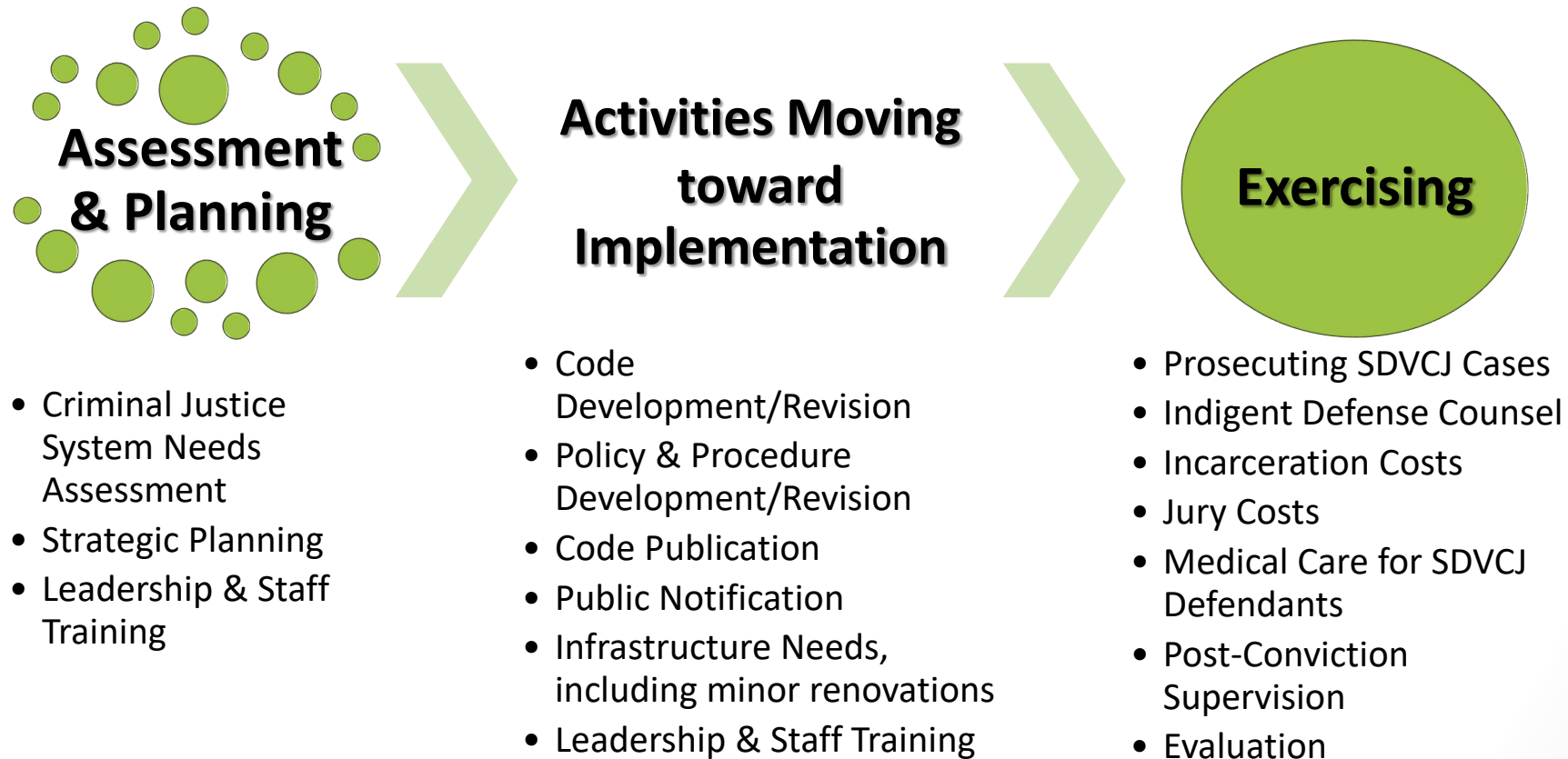
- Created in FY 2016
- Program is designed to assist Indian tribes, with jurisdiction over Indian country, to plan for and exercise Special Domestic Violence Criminal Jurisdiction (SDVCJ)
- Provides monetary and technical support for activities across the planning, implementation, and exercising phases
- The program encourages collaborations and coordinated involvement of the entire tribal criminal justice system, including victim service providers
- 30 active grantees
- For more information – see <https://www.justice.gov/ovw/open-solicitations>

OVW Tribal Jurisdiction Program Purpose Areas

1. To strengthen tribal criminal justice systems to assist Indian tribes in exercising SDVCJ, including:
 - A) law enforcement.
 - B) prosecution.
 - C) trial and appellate courts.
 - D) probation systems.
 - E) detention and correctional facilities.
 - F) alternative rehabilitation centers.
 - G) culturally appropriate services and assistance for victims and their families.
 - H) criminal codes and rules of criminal procedure, appellate procedure, and evidence.
2. To provide indigent criminal defendants with the effective assistance of licensed defense counsel, at no cost to the defendant, in criminal proceedings in which a participating tribe prosecutes a crime of domestic violence or dating violence or a criminal violation of a protection order.
3. To ensure that, in criminal proceedings in which a participating tribe exercises SDVCJ, jurors are summoned, selected, and instructed in a manner consistent with all applicable requirements.
4. To accord victims of domestic violence, dating violence, and violations of protection orders rights that are similar to the rights of a crime victim described in section 3771(a) of Title 18, consistent with tribal law and custom.

Range of Projects

Not limited to tribes that are already exercising or immediately prepared to exercise SDVCJ upon receiving funding. OVW will consider applications from tribes at any phase.



Federal Award Information

Funding Type:	Grant
Estimated Total Funding:	\$3,400,000*
Expected Number of Awards:	10
Award Ceiling:	New – \$450,000 Continuation – \$300,000
Award Period Start Date:	October 1, 2021
Length of Award Period:	New – 36 months Continuation – 24 months

At the end of the initial 36-month award period, grantees may be eligible to receive 24 months of additional funding to continue their projects.

* Total funding for Tribal Jurisdiction Program is \$3,400,000.

FY2021 Application Timeline

- ❖ Solicitation opened on or about January 12, 2021
 - ❖ Applications for this program will be submitted through a **NEW two-step process**:
 - **March 26, 2021 (11:59pm Eastern)**: submit SF-424 and SF-LLL in Grants.gov
 - **March 30, 2021 (11:59pm Eastern)**: submit application in JustGrants
-

- ❑ ASAP (and no later than March 15, 2021): Register with Grants.gov and with the System for Award Management (SAM.gov)
- ❑ March 15, 2021: Applicants are strongly encouraged to submit a non-binding Letter of Intent to OVW.TribalAffairs@usdoj.gov
- ❑ **March 26, 2021 (11:59pm Eastern)**: Submit the SF-424 and SF-LLL in Grants.gov
- ❑ **March 30, 2021 (11:59pm Eastern)**: Submit the full application including attachments in the Justice Grants System (JustGrants).
- ❑ October 1, 2021: OVW anticipates notifying all applicants of funding decisions

Applicants

- **Eligible Applicants:** Indian tribal governments that have jurisdiction over Indian country (18 U.S.C. § 1151).
- **New Application:**
 - Tribes that have never received funding under this program; and
 - Tribes that received funding under this program in FY 2016.
- **Continuation Application:**
 - Current grantees that received new awards under this program in FY 2017 or FY 2018 are eligible to apply for 24 months of continuation funding. Continuation funding is not guaranteed.
 - *Note: Grantees currently exercising SDVCJ may apply under the “Targeted” solicitation for funding to support discrete costs associated with the exercise of SDVCJ.*
- **Not Eligible:** (1) FY 2019 recipient of a new 36 month award and (2) FY 2020 recipient of a new OR continuation award

***Current grantees with a substantial amount of unobligated funds remaining (50 percent or more of the previous award) as of March 31, 2021 without adequate justification may not be considered for funding or may receive a reduced award amount if selected for funding in FY 2021. ***

Application and Submission Information

- The complete application package (solicitation, with links to required forms) is available on Grants.gov or at the OVW website. Applicants wishing to request a paper copy of the application materials should contact 202-307-6026.
- Application Process:
 1. DUNS number and Sam.gov registration (ASAP)
 2. Grants.gov registration and JustGrants registration (ASAP)
 3. Encouraged to submit letter of intent (March 15, 2021)
 4. Submit materials to Grants.gov (by March 26)
 5. Submit materials to JustGrants (by March 30)
- Content and Form of Application Submission
 - **Review pages 13-29 carefully!** They contain important information about the required forms, required content for project narrative and budget, and formatting requirements.

Application Checklist

1. Submit materials to Grants.gov by March 26
 - Application for Federal Assistance (SF-424)
 - Disclosure of Lobbying Activities (SF-LLL)
2. Submit materials to JustGrants by March 30
 - Proposal Abstract* (5pts)**
 - Proposal Narrative* (75 pts total)**
 - Initial Assessment (30 pts)
 - What Will Be Done (35 pts)
 - Who Will Implement (10pts)
 - Budget and Associated Documentation* (15 pts)**
 - Pre-Award Risk Assessment
 - Data Requested with Application
 - Document demonstrating authority to apply (5 pts)
 - Disclosures, assurances, and certifications

***Applications MUST include these documents** or they will not be considered for funding.

Program Requirements – Post-award

Applicants that receive funding under the Tribal Jurisdiction Program will be required to engage in the following activities:

- **OVW training and technical assistance participation**
- **Inter-tribal Technical Assistance Working Group (ITWG) on SDVCJ Participation**
 - Applicants need not be current members but will be *expected to join and participate in the ITWG if they receive an award.*
- **Planning period** which includes submitting grant documentation that is not being required at the time of application.
- Submission and approval of the **SDVCJ readiness certification**, if applicable.
- **MOU/IMOU required partners**
 - *Tribal Leadership*
 - *Tribal Judge*
 - *Prosecutor's office*
 - *Tribal Attorney/General Counsel*
 - *Law enforcement*
 - *Victim Services Provider*
- Possible participation in an assessment or evaluation with OVW.

OVW FY 2021 Grants to Tribal
Governments to Exercise Special
Domestic Violence Criminal Jurisdiction
Grantees - Targeted Support for
Exercising Tribes Solicitation

“Targeted”
Exercise of SDVCJ

Overview of Grant Program

- Created in FY 2016 (same grant program - first time this type of solicitation is being released)
- Program is designed to assist Indian tribes, with jurisdiction over Indian country, to exercise Special Domestic Violence Criminal Jurisdiction (SDVCJ)
- Provides monetary and technical support for activities in the exercising phases
- The program encourages collaborations and coordinated involvement of the entire tribal criminal justice system including victim service providers
- For more information – see <https://www.justice.gov/ovw/open-solicitations>

OVW Targeted Support for Exercising Tribes

Solicitation Purpose Area

Funds may be used to defray costs resulting from a tribe's exercise of SDVCJ including costs associated with:

- law enforcement
- prosecution
- trial and appellate courts
- probation systems
- detention and correction facilities
- alternative rehabilitation
- culturally appropriate assistance for victims and their families
- providing defense counsel to indigent criminal defendants
- empaneling juries

Federal Award Information

Funding Type:	Grant
Estimated Total Funding:	\$1,500,000*
Expected Number of Awards:	10
Award Ceiling:	\$200,000
Award Period Start Date:	October 1, 2021
Length of Award Period:	24 months

* Total funding for Tribal Jurisdiction Program is \$3,400,000.

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Applicants

- **Eligible Applicants:**
 - Indian tribal governments that have jurisdiction over Indian country (18 U.S.C. § 1151).
 - Are currently exercising SDVCJ consistent with the Indian Civil Rights Act
- **Two Types of Application:**
 - **New:** Tribes that have never received funding under this program and tribes that received funding under the OVW Tribal Jurisdiction program in FY 2016.
 - **Continuation:** Current grantees that received new awards under this program in FY 2017 or FY 2018 are eligible to apply for 24 months of continuation funding. Continuation funding is not guaranteed.
- **Not Eligible:** (1) FY 2019 recipient of a new 36 month award and (2) FY 2020 recipient of a new OR continuation award

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 - Proposal Narrative* (80 pts total)**
 - Purpose of the Proposal (35 pts)
 - What Will Be Done (35 pts)
 - Who Will Implement (10pts)
 - Budget and Associated Documentation* (15 pts)**
 - Pre-Award Risk Assessment
 - Data Requested with Application
 - Exercising SDVCJ Certification
 - Disclosures, assurances, and certifications

***Applications MUST include these documents** or they will not be considered for funding.

Program Requirements – Post-award

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- **OVW training and technical assistance participation**
- **Inter-tribal Technical Assistance Working Group (ITWG) on SDVCJ Participation**
 - Applicants need not be current members but will be *expected to join and participate in the ITWG if they receive an award.*
- Possible participation in an assessment or evaluation with OVW.

Questions?

FY 2016 SDVCJ Grantees

- **Tulalip Tribes**- Located in Tulalip, Washington. Tulalip is one of the five pilot project tribes and began exercising Special Domestic Violence Criminal Jurisdiction (SDVCJ) in February 2014. The tribe is utilizing grant funds to fund a victim services coordinator within the prosecutor's office. The tribe is also using grant funds to utilize GPS monitoring for the purpose of tracking and monitoring defendants to safeguard victims.
- **Little Traverse Bay Bands of Odawa Indians**- Located in Harbor Springs, Michigan. Prior to receiving the Tribal Jurisdiction grant, the tribe implemented SDVCJ in March 2015. The tribe is using the grant funds for staff training; finalizing SDVCJ policies and procedures; refining the process for indigent defendants; and refining the jury pool process.
- **Confederated Tribes of the Chehalis Reservation** - Located in Oakville, Washington. The tribes implemented SDVCJ using grant funds, including code drafting and staff trainings. The tribe is also using funds to incarcerate and provide health care for non-Indians.
- **Port Gamble S'Klallam Tribe** - Located in Kingston, Washington. The tribe implemented SDVCJ using grant funds and continues to use funding staff training.
- **Santa Clara Pueblo** - Located in Rio Arriba County, New Mexico. The tribe implemented SDVCJ using grant funds and will continue to provide training for judges, defense counsel and law enforcement.
- **Yurok Tribe** - Located in Del Norte and Humboldt Counties, California - a Public Law 280 state. The tribe is currently in the process of drafting its criminal code and the necessary SDVCJ codes. The tribe is utilizing grant funds for staff training and incarceration for non-Indians.

FY 2017 SDVCJ Grantees

- **Eastern Band of Cherokee Indians** – Located in western North Carolina. The tribe implemented SDVCJ in June 2015. The tribe is utilizing the grant funds to develop a data collection initiative and accompanying software to achieve domestic violence offender accountability and ensure victim’s rights. The tribe is also using funds to create a cross-agency trauma-informed DV response system to enhance victim safety and to ensure offender accountability through increased witness participation.
- **Standing Rock Sioux Tribe** – Located in Sioux Country, North Dakota and Corson County, South Dakota. The tribe implemented SDVCJ in May 2016. The tribe is utilizing grant funds for jury pool development. The tribe is also using funds to hire a tribal victim advocate and a consultant to provide counseling for victims. In addition the tribe will use funds to provide training to shelter staff, advocates, tribal staff and members of the multi-disciplinary team. The tribe will also use grant funds for criminal case management software and software for the jury pool process.
- **Comanche Nation** – Located in southwest Oklahoma. The tribe is using the grants funds for: constitutional reform; recording equipment for the courtroom; the development of an Indigent Defense Program; the development of an on-call victim advocacy program; the development of a wallet size protection order program; and the development of a batterer’s intervention program.
- **Gila River Indian Community** – Located in Pinal and Maricopa Counties, Arizona. The tribe used grant funds to implement SDVCJ, including to develop jury pool procedures, implement policies and procedures for all departments to maintain SDVCJ data collection. The tribe will continue to use grant funds to support this work and for anticipated trial costs. The tribe also plans to use funds to implement policies and procedures for non-Indian inmate housing and detention, including procedures for non-Indian inmate medical care. The tribe will also use grant funds to hire a defense investigator to assist public defenders. It will also use funds to provide training and technical assistance to all stakeholder departments on SDVCJ and domestic violence.
- **Los Coyotes Band of Cahuilla and Cupeno Indians** – Located in northeastern San Diego County, California – a Public Law 280 state. The tribe is using their grant funds to establish a domestic violence court. The tribe will plan, implement and assess the court once it has been established.
- **Swinomish Indian Tribal Community** – Located in Skagit County, Washington. The tribe is utilizing grant funds to revise the tribal code. The tribe is also using the grant funds to provide court case management software to prosecution and defense counsel. In addition the tribe is using grant funds to hire a bailiff and transport officer.

FY 2018 SDVCJ Grantees

- **Little River Band of Ottawa Indians** – Located in western Michigan. The tribe is utilizing the grant funds to prepare for and ultimately exercise SDVCJ. The tribe will use the funds to revise its jury selection system, establish an indigent defense program, enact a Victims' Bill of Rights, amend the Domestic Violence code and Constitution. Ultimately, the tribe plans to begin prosecuting SDVCJ cases and will use grant funds to cover incarceration costs.
- **Pascua Yaqui Tribe** – Located in southwest Arizona, near Tucson. The tribe implemented SDVCJ in February 2014 and is using grant funds to enhance its ability to exercise SDVCJ and respond to the needs of victims of VAWA cases. Specifically, the tribe is utilizing grant funds to hire a prosecutor, obtain additional domestic violence training, and cover medical care expenses for defendants.
- **St. Croix Chippewa Indians** – Located in northwestern Wisconsin. The tribe is using the grant funds for to hire a project coordinator who will also act as Tribal Prosecutor and indigent defense counsel. The tribe will also use grant funds to cover defendants' incarceration and medical care costs.
- **Rosebud Sioux Tribe** – Located in south central South Dakota. The tribe is using the grants funds to review and update tribal codes, court processes and forms, develop and implement jury processes, and cover the costs for qualified judges, prosecutors and defense counsel to handle SDVCJ cases. The tribe will also use grant funds to cover medical expenses for defendants and provide on-site training on domestic violence and SDVCJ related issues to law enforcement, attorneys, court staff, etc.

FY 2019 SDVCJ Grantees

- **Fort Peck Tribes** – located in the northeastern part of Montana. The Tribes are using the funding to improve the infrastructure, training and capacity to exercise SDVCJ and provide justice for victims and defendants alike.
- **Hopi Tribe** – located in northern Arizona. The tribe will plan, implement and exercise SDVCJ, including educating the community and tribal leadership about SDVCJ.
- **Lummi Indian Business Council** – Located in northwestern Washington. The tribe will plan, implement and exercise SDVCJ, including use of a “pilot phase” in which the tribe can assess, evaluate and report the impacts of SDVCJ on the tribal judicial system.
- **Pokagon Band of Potawatomi** – Located in southwestern Michigan. In addition to implementing and exercising SDVCJ, the Band will provide culturally-appropriate trauma-informed counseling services to victims and medical resources to non-Indian inmates.
- **Pueblo of Pojoaque** – Rural community with a small land base (20 square miles) located in New Mexico. Pueblo will use funding to implement SDVCJ, including enactment of a victim’s rights code and development of a public defender system.
- **Suquamish Tribe** – Small (12 square miles), checkerboard reservation that is divided into two sections and located in Washington. The Tribe will use the funds to exercise SDVCJ, including creating a more robust pretrial services program.
- **Confederated Salish and Kootenai Tribes** – Large reservation located in Montana, a PL 280 jurisdiction, that obtained partial state retrocession of jurisdiction in 1993. The Tribes will use these funds to plan for implementation of SDVCJ.
- **Mandan, Hidatsa and Arikara Nation** – Located in North Dakota. The Nation will ultimately implement SDVCJ and plans to hire a dedicated SDVCJ Project Coordinator to facilitate the process.

GENERAL GRANT WRITING TIPS

While planning and before submitting...

- If you are working on your application and you make a **single** file made up of separate attachments-DO NOT submit it to OVW this way.
- It is very important to use **separate attachments** of documents when submitting your application to OVW.
- Clearly label each attachment.
- Combine related attachments such as resumes so peer reviewers are not overwhelmed with multiple attachments.

Common Problems: biggest reasons for unsuccessful applications overall

- Not responding to all of the requested information
- Failed to draw connection between pressing problems identified in the “initial assessment” (or “purpose of the proposal” in the Targeted solicitation) and “what will be done”.
- Not providing the requested information in relevant section where peer reviewers could easily locate it
- Failed to draw the connection between the proposed budget and the programmatic activities requested in the “project narrative.”
- Inconsistencies within proposal - different writers by section
- Did not provide specific measurable targets for performance measures

Tips for submitting a proposal

- 1. Read the Solicitation.** Read entire solicitation and follow all instructions carefully. No detail is too small and no instruction should be ignored. Be sure to respond to all questions and requirements in the solicitation.
- 2. Check all of the resources available through the Online OVW website.**
- 3. Don't wait until the deadline to apply!** Avoid connection issues with the Internet, Grants.gov or JustGrants and apply early. These websites may run slowly on the deadline day because of increased website traffic. Apply at least 72 hours before the deadline!
- 4. Go back and review the “initial assessment”:** Make changes as needed to ensure that the connection is clearly drawn between pressing problems identified in the “initial assessment” and “what will be done” and that they are in line with the Program Purpose Areas.
- 5. Go back and review the budget after completing the project narrative:** Make changes as needed to ensure that the connection is clearly drawn between proposed budget and programmatic activities requested in the “project narrative.”

General Approach to Federal Grants

- 1. Plan Ahead – *Do Not Wait until the RFP is out***
- 2. Regular Annual Rhythm/Pattern for most Federal Grants**
(RFP in November-February with Grant Award not until September)
- 3. Contact Agency Grant Managers**
- 4. Contact Tribal Technical Assistance (TA) Providers**
- 5. Review Online Resources and Prior Proposals**
- 6. Serve as Peer Reviewer *(or at least Mock Peer Review Exercise)***
- 7. Register on Grants.gov and JustGrants well ahead**

If You Have Applied Unsuccessfully:

- Always ask Agency to provide you with strengths and weaknesses comments
- Keep prior proposals & comments (*although different review panel each time*)
- Ask Agency what other services can be provided such as:
 - Training and Technical Assistance (T/TA) without grant
 - Capacity Building
 - Scholarships for Conferences/Trainings
- Ask Agency who was funded and for copies of successful applications
- Ask Agency for TA Provider contact information

Tips for Writing Grants

- **Focus on deadline and any necessary attachments (*tribal resolutions, support letters*)**
- **Focus on scoring criteria (*think of it as a checklist because it is*)**
- **Use scoring criteria as a general guide for how many pages you devote to each section**
- **Always answer every question / address every issue**
- **Use all available pages**
- **Utilize attachments if at all possible (*timeline, support letters, etc.*)**
- **Follow all format directions (such as labeling sections/page numbering)**
- **Make it easy for the reviewer to read and score**
- **Have staff internally review and score**
- **Always PDF everything**
- **Always label clearly**
- **Do something different, interesting, and replicable**

Thank you!

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Questions?