



MILWAUKEE POLICE DEPARTMENT

STANDARD OPERATING PROCEDURE

267 – BUDGET AND FINANCE

GENERAL ORDER: 2026-27
ISSUED: June 18, 2026

EFFECTIVE: June 18, 2026

REVIEWED/APPROVED BY:
Assistant Chief Craig Sarnow
DATE: May 11, 2026

ACTION: Amends General Order 2025-35 (July 24, 2025)

WILEAG STANDARD(S): 1.5.1, 1.5.2, 1.5.3, 1.5.4, 1.5.5

ROLL CALL VERSION

Contains only changes to current policy.
For complete version of SOP, see SharePoint.

267.10 DEFINITIONS

B. CONTRACTOR (OR VENDOR)

§200.22. Contract means a legal instrument by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award.

§200.23 Contractor means an entity that receives a contract as defined in §200.22 Contract.

CB. ENCUMBRANCE

D. PASS-THROUGH ENTITY

§200.74 pass-through entity means a non-federal entity (such as the City of Milwaukee) that provides a subaward to subrecipients to carry out part of a federal program.

EC. PRE-ENCUMBRANCE

FD. REMAINING BUDGET

GE. PROJECT MANAGER

H. SUBAWARD

§200.92 Subaward means an award provided by a pass-through entity to a subrecipient to carry out part of the federal grant award received by the pass-through entity. Subaward does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program.

I. SUBRECIPIENT

§200.93 Subrecipient means a non-federal entity (such as the YMCA or Boys & Girls Club) that receives a subaward from a pass-through entity to carry out part of a federal

grant program; subrecipient does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency.

267.20 FISCAL MANAGEMENT OF ASSET FORFEITURE SHARED PROCEEDS

Equitable shared funds and items purchased with shared funds shall be managed using standard accounting procedures and internal controls consistent with city policy and the United States (US) Office of Management and Budget's *Uniform Administrative Requirements, Costs, Principles, and Audit Requirements for Federal Awards*. Funds received through the State of Wisconsin, US Department of Treasury and the US Department of Justice shall be tracked separately, using the following procedures:

1. The City's Financial Management Information System, with oversight by the City of Milwaukee Comptroller, shall be used to record receipt of shared funds, process invoices, and record expenses.
2. Separate accounting codes shall be used to track revenue and expenses. No other funds may be comingled in these accounts.
3. All purchases, disposal, and sale proceeds shall be made in accordance with [Chapter 16](#) of the Milwaukee City Charter, [Chapter 310](#) of the Milwaukee Code of Ordinances, and the Department of Administration (DOA) - [Purchasing Liaison Manual](#) (last updated on January 30, 2025).
4. Interest earned on equitable shared funds shall be deposited in the respective account codes and will be subject to the same use restrictions as equitable sharing funds.
5. Items purchased with equitable sharing funds exceeding \$5,000 shall be tracked using serial numbers of the item.
6. Funds received and deposited to the Asset Forfeiture Trust Fund shall be transferred by the City of Milwaukee Comptroller in accordance with a resolution adopted by the City of Milwaukee Common Council. The transfer shall be consistent with the Milwaukee Police Department's asset forfeiture plan as presented to the Common Council's Finance and Personnel Committee.
7. Expenditures of shared funds shall be authorized by the Chief of Police with designation of approval to the director of the Budget and Finance Division.
8. The Budget and Finance Division shall prepare and submit the annual Equitable Sharing Agreement and Certification (ESAC) and obtain signature approval from the Chief of Police and Mayor of the City of Milwaukee.

267.25 GRANT / ALTERNATIVE-FUNDING REQUESTS

- A. In an effort to meet or exceed service expectations while providing service within budgetary constraints, the department shall actively seek local, state, federal, and

private grants or alternative sources of funding that may be available to the department. All grant or alternative-funding requests shall be made in accordance with SOP 200.10.

1. Due to the competitive nature of grant or alternative-funding requests, it is imperative that these types of projects be submitted for consideration in a timely manner.
2. All applications, reports, and required documentation required by a grant or alternative funding is the responsibility of Budget and Finance, or their designee. All applications are due one week prior to the official deadline of the grantor or alternative funding source. If designated, project or managers/directors for grant or alternative-funding requests shall ensure that all applications, reports, and required documentation are provided to Budget and Finance for final review and submission no later than two-weeks prior to the deadline of the requested source of funding.

B. The following are step-by-step procedures that shall be adhered to for all grant applications:

1. The member may identify a new grant or an existing grant he/she is planning to renew.
2. The member must then receive approval from his/her commanding officer, an assistant chief of police, or designee, or chief of staff before contacting Budget and Finance for grant assistance.
3. If a new grant or alternative funding request is approved, the Budget and Finance grant compliance manager will work with the member to review program and funding materials before beginning the application. For grant renewals, advise Budget and Finance that you wish to conduct a grant renewal so that Budget and Finance can obtain the recommendation from the chief of staff.
4. During the grant writing process, the Budget and Finance grant compliance manager will work with the member for assistance with the application. In certain cases, the Budget and Finance Division may delegate the grant writing responsibility to the member.
5. Budget and Finance will conduct the final submission of all grant applications.
6. If, after submission, the grant request is denied, Budget and Finance will inform department stakeholders of the denial.
7. If the grant request is approved, the director of Budget and Finance, or designee, will hand-deliver any documentation received from the grantor that requires the signature of the Chief of Police, his/her designee, or any other city official.
8. All signed documents will be forwarded to the grantor directly from Budget and Finance, and copies distributed to project directors.
9. During the grant period, forward all correspondent grant information received, or submitted to the grantor, directly to Budget and Finance.

C. Procedures for managing equipment (including replacement equipment) whether acquired in whole or in part under a federal award, until disposition takes place shall, as a minimum, meet the following requirements:

1. Each work location assigned property acquired under a federal award shall submit a copy of such list on an annual basis at the beginning of each calendar year to their respective bureau commander.
2. Budget and Finance shall maintain property records that include a description of the property, a serial number or other identification number, the source of funding for the property (including the Federal Award Identification Number (FAIN)), who holds title, the acquisition date, and cost of the property, percentage of federal participation in the project costs for the federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.
3. Each location shall conduct a complete and accurate physical inventory of property acquired under a federal award at least once every 2 years.
4. Work locations shall establish proper control systems (e.g., sign in and out logs, storage of property in a secure area of the work location as designated by the commanding officer) to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated in accordance with SOP 340 Uniforms / Equipment / Appearance.
5. Work locations shall follow all required maintenance requirements and procedures to maintain the property in good condition.
6. Property obtained shall be purchased, retained, sold, replaced, and/or disposed of in accordance with the requirements of the federal award. If the department is authorized or required to sell the property, proper sales procedures must be established by Budget and Finance to ensure the highest possible return.

267.30 PROCEDURES FOR GRANT MANAGEMENT

A. GRANT APPLICATION AND ACCEPTANCE

1. MPD will review grant funding opportunities from federal, state, private, and non-profit sources. Grant opportunities will be evaluated based on alignment with departmental priorities, operational needs, and community impact. Approval from the Command Staff (see SOP 267.20(B)(2)) is required prior to submission of any grant application.
2. Following an award, MPD will review all conditions established by the awarding entity. If award conditions are suitable and the grant is over \$20,000, MPD will submit a resolution for the City of Milwaukee Common Council to establish the authority for MPD to accept the funding. If the award is under \$20,000, MPD may accept the funding without a resolution.

3. Award documentation will clearly outline key elements of the award, including:
 - a. Funding source and awarding entity;
 - b. Award identification details;
 - c. Effective dates for performance and budget periods;
 - d. Total funding amount;
 - e. Scope of work and intended outcomes;
 - f. Applicable cost principles, including indirect cost provisions if authorized;
 - g. Required reporting schedules;
 - h. Administrative and financial conditions; and
 - i. Any additional provisions tied to the award.

B. GRANT ADMINISTRATION

All grant-related financial activity will be administered through the City of Milwaukee's Financial Management System (FMIS). The Office of the Comptroller will establish a distinct project identifier to ensure accurate tracking and oversight of grant funds. MPD will maintain documentation supporting all program activities, including operational outputs, equipment usage, and personnel-related costs. Program staff will collect and maintain data demonstrating progress toward stated objectives.

C. POLICY FOR EXPENDITURE OF GRANT FUNDS

1. Grant funds will be used strictly for approved purposes and must meet standards of necessity, reasonableness, and allocability. All spending must comply with applicable City of Milwaukee regulations and financial policies.
2. Supporting documentation is required for all costs charged to a grant, including:
 - a. Authorization consistent with the approved budget;
 - b. Vendor billing records;
 - c. Payroll and timekeeping records for personnel expenses;
 - d. Documentation supporting procurement decisions;
 - e. Proof of completed payments;
 - f. Approved indirect cost documentation, if applicable; and

g. Any additional records required to substantiate the expense.

D. GRANT MONITORING AND COMPLIANCE

1. MPD will adhere to all regulatory and contractual requirements associated with each grant award. Oversight responsibilities are shared with the Office of the Comptroller, which provides financial review and guidance. Required documentation will be submitted to the Comptroller to support oversight activities. MPD will routinely review financial and program performance to ensure adherence to grant conditions.
2. Monitoring activities are intended to:
 - a. Confirm alignment with approved project plans;
 - b. Ensure proper use of funds;
 - c. Evaluate internal controls related to grant activities;
 - d. Assess progress toward expected results; and
 - e. Verify that all costs are supported and appropriate.
3. All monitoring efforts will be documented and retained in accordance with recordkeeping requirements. If deficiencies are identified, MPD will take corrective steps and coordinate with the Comptroller to resolve issues.

E. REPORTING

MPD will complete and submit all required reports within established deadlines. MPD will reconcile cumulative expenditures and obligations recorded in FMIS with amounts reported in quarterly financial reports for all grants. For Federal grants, all expenditures reported on FFRs will be properly supported and reconciled to the expenditure amounts recorded in FMIS. Any discrepancies identified during this process will be reviewed and corrected prior to report submission. Reporting may include financial summaries of grant activity, descriptions of program implementation and outcomes, and supporting materials as required by the funding entity.

F. GRANT MODIFICATIONS

Changes to approved budgets, timelines, or project scope must be formally requested and approved by the awarding entity before implementation. All approved changes will be documented and retained in the official grant file.

G. EQUIPMENT AND ASSET MANAGEMENT

Items acquired with grant funds will be recorded and tracked in accordance with the City of Milwaukee Office of the Comptroller Grant Accounting Policies and Procedures. Records will include identifying details, acquisition information, and current location. Use and disposition of such items will follow applicable requirements associated with

the funding source and City of Milwaukee policy.

H. GRANT CLOSEOUT AND RECORD RETENTION

1. At the conclusion of the award period, MPD will complete all required administrative and reporting actions. Closeout activities will include:
 - a. Submission of final reports;
 - b. Reconciliation of financial records;
 - c. Verification that all project requirements have been fulfilled; and
 - d. Completion of any additional closeout steps required by the funding entity.
2. All documentation related to grant activities will be retained for the required period based on applicable City of Milwaukee regulations and funding source requirements. Records will be stored securely and made available for review when necessary.

267.30 PROCEDURES FOR SUBAWARDS AND SUBRECIPIENT MONITORING

A. SUBAWARD SELECTION

MPD will review requests for subaward funds from eligible entities, including government organizations, non-profit (501(c)(3) or others), educational institutions, and small businesses. Subrecipients must be registered in SAM.gov and must obtain a unique entity identifier (UEI) within 120 days of receiving a subaward from MPD. Subaward selection will be based upon demonstrable evidence that program outcomes will support the goals of the parent grant and remain consistent with the mission of MPD.

B. AGREEMENT

MPD will execute a subaward agreement with all subrecipients of federal grants as required by 2 CFR 200. Subaward agreements will include the following required data:

1. Subrecipient name;
2. Subrecipient Unique Entity Identifier (UEI);
3. Federal Award Identification Number (FAIN);
4. Federal award date;
5. Subaward period of performance start and end date;
6. Subaward budget period start and end date;
7. Amount of federal funds obligated in subaward to the subrecipient;

8. Federal award project description;
9. Name of the federal awarding agency;
10. Name of pass-through entity and contact;
11. Assistance Listing Number (ALN);
12. Identification of whether the federal award is for research and development;
13. Indirect cost rate (including if de minimis rate) if applicable;
14. Reporting and reimbursement schedules;
15. Requirements imposed on the subrecipient; and
16. Additional requirements and special provisions that are passed down to the subrecipient including award terms and conditions, etc.

C. SUBAWARD MANAGEMENT

1. MPD will use the City of Milwaukee's Financial Management System – (FMIS) for financial management and monitoring of all subrecipient grant awards.
2. The Budget and Finance Division will use a unique FMIS project tracking identification number for each subaward.
3. Tracking numbers will be established by the Office of the Comptroller and will enable MPD to capture and control the specific financial information for the subaward in accordance with restricted funding source(s). This will enable MPD to record and report receipts, obligations, and expenditures of the city's grant funds, and maintain the accounting records and documentation for accurate tracking of financial data.
4. MPD will also obtain any additional programmatic reports as necessary from the subrecipient. Programmatic reporting requirements will include qualitative and quantitative data that demonstrates evidence of programmatic outcomes achieved.

D. POLICY FOR TRANSFER OF FEDERAL, STATE, PRIVATE OR NON-PROFIT FUNDS

1. It is policy of MPD to provide payments from grant awards to subrecipients on a reimbursable basis. This policy minimizes the time elapsing between the transfers of federal funds by the city to the subrecipients. Therefore, the costs requested for subrecipient reimbursement must be actual "Paid Cost" from their general ledger.
2. MPD will require the subrecipients to document the following for every line amount claimed in their request for reimbursements:

- a. Actual "Paid Costs" from their general ledger;
- b. Payment details like "check numbers" & "check dates";
- c. Amount paid with the check and amount requested;
- d. Vendor name, invoice and line item description;
- e. Payroll register (if payroll);
- f. If requesting indirect costs, the approved indirect cost plan must be on file; and
- g. Other supporting documentation as necessary.

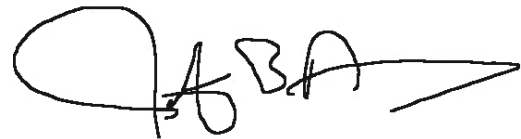
E. SUBAWARD MONITORING AND FISCAL REVIEWS

1. The requirement for subrecipient monitoring is outlined in the Uniform Grant Guidance 2 CFR 200 §302.303. The guidelines state that non-federal entities that receive federal grant funds and pass the federal grant funds to other entities have oversight responsibilities for the operations of the federal award received and the supported activities. The City of Milwaukee Office of the Comptroller (Comptroller) has primary responsibility for carrying out these responsibilities, including pre-award assessment (preliminary review).
2. To assist the Comptroller, MPD will obtain documentation and will forward all required information to the Comptroller's Office. The role of the Comptroller's Office is to analyze the information submitted and provide comments that would assist the department in their funding decisions and monitoring.
3. MPD will conduct ongoing monitoring of all subrecipient awards. Monitoring will include the review of project budgets, quarterly financial and performance reports, and annual site visits in September of each year. The purpose of monitoring is to:
 - a. Ensure compliance with the subaward agreement;
 - b. Review internal controls and potential conflicts of interest to protect federal funds;
 - c. If applicable, ensure any issues identified in subrecipient's audit report submission are resolved in compliance with the requirements of the Title 2 CFR 200.501;
 - d. Verify eligibility of the costs claimed;
 - e. Determine that the costs are reasonable, documented and necessary under the grant; and
 - f. Determine that the costs are allocable to the grant and traceable to the entity's financial statements.

4. Should any findings require corrective action, MPD will identify the violation and work with the subrecipient to implement a corrective action plan. Any corrective action plan will be shared by MPD with the Comptroller for input and comment. Further, MPD will follow up with the subrecipient to ensure findings and recommendations are resolved to MPD's satisfaction. If identified issues are not resolved, MPD will work with the Comptroller to determine appropriate sanctions under 2 CFR 200.339. All subrecipient monitoring will be documented and documentation will be maintained in the appropriate subrecipient files.

F. SUBAWARD CLOSEOUT REQUIREMENTS

MPD will work with all subrecipients to close out subawards when all administrative actions and required work has been completed. To facilitate this process, subrecipients will submit all financial, performance, and other reports to MPD within 90 calendar days after the end date of the subaward's performance period.

A handwritten signature in black ink, appearing to read 'J.B.N.' with a long horizontal stroke extending to the right.

JEFFREY B. NORMAN
CHIEF OF POLICE

JBN:mfk