Grants Management Advisory Committee (GMAC)  
C/O Office of Community Partnerships and Grants  
email: GMU@dhhs.nv.gov

May 19, 2017

Dear GMAC Committee Members:

I write on behalf of the Northern Nevada RAVE Family Foundation (RAVE), which is a current grantee and an applicant for SFY18-19, and I request that this letter be provided to all GMAC Committee members for consideration at the May 25, 2017 meeting.

After the GMAC Disability Subcommittee May 2nd meeting, RAVE became concerned that the GMAC may consider deviating from the Request for Application (RFA) without following the proper procedure. The purpose of this letter is to outline RAVE’s concerns.

**Allocation of Funds**

The RFA provides the allocations between particular funding sources with published pending amounts available. RFA 3. From the GMAC meeting a year ago, we understand these allocations were based on a needs assessment performed by the Office of Community Partnerships and Grants and the allocations were approved at that meeting. The RFA provides that any changes to these allocations would be published as an amendment to the RFA, which of course would also require a properly noticed open meeting under the Open Meeting Law, NRS Chapter 241.

The RFA also explains the subcommittee evaluation process as step 3. Nowhere in this explanation does the RFA indicate the subcommittee may materially alter the terms of the RFA. Despite the clear language of the RFA, the subcommittee suggested at the May 2nd meeting that awards be cut by 20% so that funds could be reallocated from the allocations previously decided by the GMAC and published in the RFA. This is a significant change to the RFA that would constitute reconsideration of the GMAC’s prior decision, which was not noticed or approved by the GMAC. Applicants prepared their applications based on the terms and conditions of the RFA and relied on representations therein that any changes to that process or the allocation of funds would be published in an amendment to the RFA. The time to amend the RFA has passed.

RAVE respectfully requests that the allocations published in the RFA remain unchanged.

**Scoring of Applications**

RAVE also has concerns about Open Meeting Law requirements related to the RFA. The RFA requires
RFA requires scoring of proposals by at least two staff members, who then make a recommendation to the appropriate subcommittees. RFA 17. The Open Meeting Law defines “public body” to include groups of two or more individuals who make a recommendation to a public body. NRS 241.015(4)(e). This group may be a subcommittee of the subcommittee, which would make it subject to the Open Meeting Law.

During this scoring process, described as step 2 in the RFA, this group of people reviews for content, applying the scoring matrix in Appendix A or B and identifies strengths and weaknesses. By the RFA’s own terms, this is not a “technical review,” which occurs at step 1. Instead, this review involves the exercise of judgment and discretion, identifying strengths and weakness of applications. RAVE’s review of the feedback received from step 2 for its applications reveals very subjective comments and strengths and weakness not delineated as requirements in the RFA itself. None of step 2 occurs in a properly noticed public meeting.

Applications being scored with a minimum score of 60 progress to step 3, the subcommittee evaluation. The RFA states exceptions to the scoring requirements may be made to ensure statewide geographic distribution of funds. RFA 17.

RAVE respectfully requests an explanation from GMAC whether any exceptions to the scoring requirements were considered or made? If so, when, and in relation to which applications?

Conclusion

As we are sure you are aware, the organizations applying for the grants, and the people we all serve, put great trust in you to make the right decisions as stewards of millions of public dollars. Your task is not an easy one. We ask that you carefully review the RFA, your previous decisions that led to that RFA, and all the applications before you. We also ask that you abide by the terms of the RFA, keeping the funding allocations as published in the RFA, and that you provide more information regarding whether any exceptions were made to the scoring requirements. Finally, we request that you consider the Open Meeting Law implications of two or more individuals exercising the discretion and making subjective determinations to score applications to determine whether those applications progress to the next level, which acts as recommendations to the subcommittees.

Sincerely,

Jennifer Henderson,
President

cc: Gloria Sulhoff (gsulhoff@dhhs.nv.gov)