DEPARTMENT OF HOMELAND SECURITY Office for State and Local Government Coordination and Preparedness

Assistance to Firefighters Grant (AFG) Program 2005 Program Guidance for the Fire Prevention and Safety Grant

This document provides a summary of the Office for State and Local Government Coordination and Preparedness 2005 Fire Prevention and Safety Grants. It explains how to apply for the grant, what items can be requested, what activities or projects can be proposed, and how applications will be evaluated. Please read this guidance carefully. Additional information will be available in Frequently Asked Questions and an online tutorial on the <u>www.firegrantsupport.com</u> website. Together, these resources provide you with the information you need to complete the online application. The online application will be available at <u>https://portal.fema.gov/</u> from 8:00 a.m. EDT on September 6, until 5:00 p.m. EDT on October 7, 2005.

Prepared by the Assistance to Firefighters Grants Program Office

AFG 2005 FIRE PREVENTION AND SAFETY GRANT GUIDANCE

The purpose of these grants is to enhance the safety of the public and firefighters with respect to fire and fire-related hazards. The primary goal of the Assistance to Firefighters Grant (AFG) Program's Fire Prevention and Safety Grant (FP&S) is to reach high-risk target groups in order to mitigate the high incidences of death and injuries. Additionally for Fiscal Year (FY) 2005 Congress amended the authorization to include funding for Firefighter Safety Research and Development. This guidance provides details for applying for either of these financial assistance instruments. There is no cost share requirement for the FY 2005 Fire Prevention and Safety grants.

The authority of this program is derived from the Federal Fire Protection and Control Act of 1974 (15 U.S.C. §§ 2229 et seq.), as amended. In fiscal year 2005, Congress reauthorized the AFG and appropriated a total of \$650,000,000 to the Department of Homeland Security's Office for Domestic Preparedness (ODP) to carry out the activities of the Assistance to Firefighters Grant (AFG) Program. The appropriated funds are available until September 30, 2006. The AFG program's authorization includes a requirement that no less than five percent of the appropriated funds support fire prevention activities. As such, no less than \$32,500,000 of the total appropriation has been reserved for the Fire Prevention and Safety grants. The award of competitive fire prevention grants under this guidance will be sufficient to reach the statutory minimum.

I. Eligible Applicants

There are two activities that can be funded under this offering: The Fire Prevention and Safety activity and the Firefighter Safety Research and Development activity. Applicant eligibility requirements for each activity are stated below. Fire departments are eligible to receive assistance only in the Fire Prevention and Safety activity. Private and public nonprofit organizations are eligible to apply in both the Fire Prevention and Safety activity and Firefighter Safety Research and Development activity.

1) Fire Prevention and Safety activity:

We are authorized to award grants to national, regional, state, local, or community organizations (including fire departments) that are recognized for their experience and expertise in fire prevention or safety programs and activities. Private and public non-profit organizations are eligible to apply for funding for these grants.

Fire departments that have received or applied for training, equipment, vehicles, etc., under the FY 2005 Assistance to Firefighter Grant Program (also known as "fire

grants") are eligible to apply for the fire prevention grants in this application period. The Federal share is limited to \$1,000,000 per application. A secondary limitation is that combined funding of grant awards through AFG "Fire Grants" and FP&S grants to any single fire department may not exceed an annual Federal share maximum (shown below), based on the population that the fire department protects.

- Populations greater than 1 million: Maximum Federal Share: \$2,750,000
- Populations from 500,000 to 1 million: Maximum Federal Share: \$1,750,000
- Populations less than 500,000: Maximum Federal Share: \$1,000,000

2) Firefighter Safety Research and Development activity:

The authorizing statute establishes our ability to award grants to national, regional, state and local organizations that are recognized for their experience and expertise in firefighter safety research and development programs. Under the statute, fire departments are not eligible to apply for funding in this activity. Private and public non-profit organizations, academic institutions, non-federal governmental organizations, non-governmental organizations, and individual researchers (i.e. doctorial candidates) are eligible to apply for funding for these grants. The Federal share is limited to \$1,000,000 per application.

II. Automated Application and Tutorial for 2005

The Fire Prevention and Safety Grant application will be directly accessible online from the grants program office website (<u>www.firegrantsupport.com</u>). The automated application has been designed with "help screens" and "drop-down menus" to assist the applicant throughout the application process. The application can be saved and retrieved for update and revision up to the point of submittal or to the end of the application period. *Please note, once an application has been completed and submitted, changes can no longer be made.* The automated system does not allow an applicant to submit an incomplete application, i.e., the system alerts the applicant when required information was not entered. By submitting an application online, the applicant will automatically receive confirmation via e-mail that their application has been successfully accepted by our system.

Shortly before the start of the application period, a tutorial will also be available at www.firegrantsupport.com to provide guidance for applicants as they navigate through the grant application and become familiar with the FP&S application requirements. The tutorial explains the eligible activities by illustrating many of the application screens; it provides tips for navigating the application screens and summarizes the changes in the FP&S application that are new in FY 2005. The tutorial also provides a review of the lessons learned from previous years. Applicants are allowed to hire or otherwise use the services of a grant writer to assist in the application process. However, the applicant is solely responsible for the information contained in their application, and in submitting their application, they are certifying that all of the information contained therein is a true and accurate reflection of their organization, the scope of effort being proposed, and the time and cost to achieve it. Applicants, therefore, are strongly encouraged to review all work produced by grant writers or other third-parties on their behalf prior to submission of their application. Applicants who falsify their application or otherwise submit an application that misrepresents their organization or proposal in any material manner will have their application deemed ineligible by the program office and referred to the Office of Inspector General for further action, as appropriate. Specific requirements with respect to grant writers are outlined below (V.8.)

III. Application Process

The online application will be directly accessible from the following Internet website:

www.firegrantsupport.com

As stated previously, the automated online application has been designed with "help screens" and "drop-down menus" to assist applicants throughout the application process. If an applicant tries to submit an incomplete application the automated system will reject it (i.e., the system will alert you if you have not provided required information). The application can be saved and retrieved for update and revision up to the point of submittal or to the end of the application period. *Once an application has been completed and submitted, changes can no longer be made.*

The online system will allow one authorized representative of an eligible organization or entity to log in and create a user name and password. The selection of the authorized representative is at the discretion of each applicant. If you have a user name and password from an AFG application or were awarded a FY 2003 or FY 2004 Fire Prevention and Safety Grant, the same user name and password should be used. Failure to use your existing user name and password could delay the processing of your application.

Paper applications are available; however, they are discouraged because of the inherent delays associated in processing them. Additionally, paper applications do not have the advantage of the built-in assistance of the electronic application, nor the assurance that the application is completed accurately before mailing. Applicants who wish to apply for FP&S by paper may request a paper application by calling the Helpdesk at 1-866-274-0960. *Paper application forms will not be sent to prospective applicants via overnight delivery, by fax or email.*

All applications must be completed and submitted electronically or postmarked on or before the close of business by 5:00 p.m. EDT on October 7, 2005. Only electronic applications submitted online via the automated grant application system will receive confirmations of receipt. Applicants should print a copy of the confirmation for their records upon receiving verification that their application has been accepted by our system. Applicants should also record their user name and password which would be used for future access of their application. No confirmation will be issued for paper applications. Applications submitted via any other electronic mode including email, fax or incomplete paper applications will automatically be deemed ineligible. Paper applications should be mailed to DHS/SLGCP, Fire Grant Program Office, 810 Seventh Street, NW, Suite 640, Washington, DC 20531. Applications mailed to any address other than the given mailing address could miss the appointed closing date and will be disqualified from consideration.

All applicants are required to provide details of their project(s) in a written narrative as well as specific description of the supporting budget. The narrative should correlate the proposed project(s) to the evaluation criteria defined below in this Program Guidance.

The narrative **cannot** exceed more than ten pages. As the applicant enters information into the narrative box, the applicant should click the "save" button periodically to ensure information has been stored. Please note the electronic application includes a "time-out" feature to help ensure activity usage of the servers. If no "save" activity is detected for a period of time, the "time-out" features is activated, and all information entered but not saved could be lost. It is a good idea to first type the narrative off-line in a word processing software, such as Word, Word Perfect, Notepad, etc., to avoid losing any information. Once the narrative is completed, an applicant can then "cut-and-paste" their proposal onto the narrative block in the application system.

As of October 1, 2003, all applicants applying for Federal grants are required to have a Data Universal Numbering System (DUNS) number. The DUNS number is a unique nine-character identification number provided by the commercial company Dun & Bradstreet. Applicants are encouraged to obtain the DUNS number prior to the application period as it <u>may</u> take up to 14 business days to obtain one. There is no charge for a DUNS number, which can be requested by registering online at <u>www.dnb.com/US/duns_update/index.html</u> or by calling 1-800-333-0505. Applicants who already have a DUNS number for the Fire Grants Program or any other Federal Program should use the same number on their FY 2005 application.

IV. Eligible Projects and Evaluation Criteria

Eligible Projects under the Fire Prevention and Safety Activity:

Applicants can submit only one application per application period with one or more projects. The applicant can describe up to 3 "projects" to address their strategic risk based on FP&S needs. Each project would have a separate supporting budget. Please note that since only one application per eligible applicant is allowed, multiple applications submitted on behalf of any one applicant will all be deemed ineligible. Be advised that applications should only consist of projects that can be completed within the one-year grant period from the time of award.

Applications that establish their project scope based upon risk assessments will receive the highest consideration. A risk assessment can be conducted through a formal or informal methodology; however, the methodology should be discussed in the application. Formal assessments consist of employing software programs or recognized expert analysis to assess risk trends. Informal assessments would include, for example, a manual study of fire loss, burn injuries, or life loss over a period of time, and the causative factors for each occurrence. Applications that are not based on an assessment, are not requesting funding for an assessment, or do not describe a completed assessment in their application will receive the lowest consideration. With respect to risk assessments, eligible costs include third-party risk assessments, and obtaining tools or other costs to conduct the assessment in-house.

Fire safety education props (trailers, mobile robots, and puppets) are eligible if they are requested in conjunction with a comprehensive and detailed public safety education campaign. The campaign's plan **must include** specific goals with measured results. Examples include reducing fire related injuries and deaths in the targeted population groups based on specific findings from a risk assessment. Applicants should include information indicative of the various outreach efforts that will be conducted and/or the number of people reached through the proposed campaign.

Items eligible for budgeting are those that support the conduct of public education, arson prevention/awareness, code enforcement/awareness, wildfire prevention/education, juvenile firesetter intervention, burn prevention, media/PR campaigns, sprinkler awareness, or smoke alarm distribution.

Fire suppression equipment, supplies, vehicles, firefighting training tools or equipment, personal protective gear, fitness equipment, or immunizations are <u>not eligible</u> for the Fire Prevention and Safety Grants. Communication equipment (including portable radios), CAD systems, or MDTs, are not eligible. Wildland/urban interface fuel reduction projects are <u>not eligible</u>. However, a project that uses a fuel reduction demonstration as part of an awareness and education effort may be considered.

Lists of prior year award winners and projects under fire prevention and safety can be found at <u>www.firegrantsupport.com</u>.

Evaluation Criteria for Projects under the Fire Prevention and Safety Activity:

The characteristics listed below are interrelated and will be used as the guideline in making funding decisions. Proposed projects that **do not** reflect these characteristics will receive lower consideration and will likely not be funded.

- Project(s) that are based on sound reasoning regarding the determination of the targeted audience(s) and supported with a risk assessment (as outlined above);
- Project(s) that incorporate an evaluation of their effectiveness and measurable goals. Specifically, applicants should identify how they intend to evaluate that the proposed project leads to attitudinal or behavioral changes;
- Projects that have an implementation plan that clearly describes the methods that they will use to reach the target audience and the applicant's ability to carry out the program;
- Projects that incorporate partnerships with other organizations or groups to enhance the development or delivery of the project. For example, the use of Fire Corp citizen advocates facilitating or implementing activities outlined in the program;
- Projects that demonstrate in the narrative a high benefit for the cost incurred and maximize the level of funding that goes directly into the delivery of the project. The costs associated with the project must also be reasonable for the target audience that will be reached;
- Propose a program that will be sustained beyond the grant performance period and has a greater potential for long-term benefits. Partnerships may also contribute to the longevity of the benefit realized from the project;
- Applicants that illustrate in their narrative the need for Federal financial assistance;
- Applicants that demonstrate a proven track record for timely project completion and performance in similar projects.

Eligible Projects for the Firefighter Safety Research and Development Activity:

The purpose of this funding activity is to improve Firefighter health and life safety through research and development projects. The following are examples of initiatives that we deem to be of high importance. This is <u>not</u> an all-inclusive list of projects that will be considered. These projects are <u>not</u> listed in order of importance. All projects must address Firefighter safety, wellness, fitness, or health.

Data collection and analysis projects such as those that:

- Seek to enhance current data collection strategies.
- Involve research into the effectiveness of firefighting equipment or personal protective equipment.
- Review the effectiveness of training and first response systems.

Sociological projects such as those that:

- Contribute to the understanding of Firefighter behavior or Fire Service culture with respect to Firefighter health and safety.
- Develop or define practical statistical sampling models.

Problem Focused Technology Studies such as those that:

- Develop new equipment or technology that can be incorporated into the Fire Service.
- Improve Firefighters safety through an enhanced understanding of hazards posed by various incidents, buildings, and environments for which Firefighters respond.

The National Institute for Standards and Technology awarded a grant to the National Fallen Firefighters Foundation (NFFF) to facilitate the development of a research agenda for the Nations Fire Service. In June 2005, NFFF hosted a working group to establish this agenda. The projects that meet the intent of the research and development agenda with respect to Firefighter health and safety, as identified by this working group will be given consideration. However, the applicant is not limited to these specific projects. All proposed projects, regardless of whether they have been identified by this working group, will be evaluated on their relevance to Firefighter health and safety. A copy of the research agenda is available on the NFFF website: www.firehero.org

Multi-year projects will be considered for this activity. If awarded, funding will initially be provided for only the first year of the project. Subsequent year funding, if awarded, would be contingent on satisfactory progress, continued worthiness of the project, and the availability of funds.

Evaluation Criteria for Projects under the Firefighter Safety Research and Development Activity:

The characteristics listed below are interrelated and will be used as the guideline in making funding decisions. Proposed projects that **do not** reflect these characteristics will receive lower consideration and will likely not be funded.

- Projects that include a plan for transferring the results to the fire service as part of the implementation phase of their activities. Projects that would have near term results that can be placed into practice within the fire service. For example partnerships may contribute to the dissemination of results at little or not cost;
- Projects whose results would be disseminated broadly or made available for implementation throughout the fire service; and the methodology used to transfer results into practice that would enhance the distribution of the results;

- Projects that demonstrate a high benefit realized for the cost incurred with a maximum level of funding that goes directly into the delivery of the project, i.e., the costs associated with the project must be reasonable;
- Projects that incorporate partnerships with other organizations or groups to enhance the development or delivery of the project;
- Applicants that illustrate in their narrative the need for Federal financial assistance;
- The degree to which the applicant is qualified and has experience with conducting research and/or development projects.

V. Other Eligible Costs (this section applies to both activities)

(1) Administrative Costs: Administrative costs are allowable under the program areas listed above, in accordance with OMB Circular A-87, A-21 or OMB Circular A-122, as applicable. (For more information about the Circulars, go to www.whitehouse.gov/omb/circulars). Administrative Costs are identifiable costs directly associated with the implementation and management of the grant. Applicants can apply for administrative costs only if the expenses are directly related to the implementation of the project for which they are proposing. The costs should be listed under the "other" category in the budget and explained in the project narrative. DHS will only reimburse costs that are based on actual expenses and not on a percentage of the overall grant. Examples of eligible administrative costs would be shipping, office supplies, computers and software associated with the NFIRS reporting requirements (see Grantee's Responsibilities, below), etc. Grant writers fee (if specifically listed on your application) are eligible and can be charged to the grant as an administrative cost in accordance with the provisions outlined (see (8) below). The Program Office has the option to assess the reasonableness of requested administrative costs in each application and will determine what is appropriate and in the best interest of the program.

(2) *Indirect Costs:* An indirect cost rate is an expense based on a percentage of the overall operational costs of an organization. The rate is established by a Federal department or agency for a grantee organization that the grantee uses to compute the dollar amount it charges to the grant to reimburse itself for indirect costs incurred in doing the work of the grant project.

Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. A cost may not be allocated to an award as an indirect cost if any other cost incurred for the same purpose, in like circumstances, has been assigned to an award as a direct cost. Typical examples of indirect cost for many non-profit organizations may include depreciation or use allowances on buildings and equipment, the costs of operating and maintaining facilities, general administration, and other general expenses, such as the salaries and expenses of executive officers, personnel administration, and accounting.

Indirect costs shall be classified within two broad categories: "Facilities" and "Administration." "Facilities" is defined as depreciation and use allowances on buildings, equipment and capital improvement, interest on debt associated with certain buildings, equipment and capital improvements, and operations and maintenance expenses. "Administration" is defined as general administration and general expenses such as the director's office, accounting, personnel, library expenses, and all other types of expenditures not specifically chargeable to the grant.

Applicants can charge indirect costs to the grant only if they have an approved indirect cost rate. Before charging indirect costs to the grant, applicants must first submit documentation that supports the indirect cost rate to FEMA's Financial and Acquisition Management Division for review and approval prior to submitting any claims for indirect costs. The appropriate documentation for an approved indirect rate is a negotiated indirect cost agreement. The indirect rate is applicable as long as it is consistent with the established terms of the agreement. For example, some indirect cost rates may not apply to capital procurements; in these cases, indirect cost rates would not apply for a grant for equipment.

(3) Audit Costs: Grantees with large awards may be required to undergo an audit in accordance with OMB Circular A-133. Specifically, recipients of Federal funding that spend an excess of \$500,000 of Federal funds in one year must undergo an audit. (For more information about the Circular, go to <u>www.whitehouse.gov/omb/circulars</u>). Costs incurred for such an audit would be an eligible expenditure if included in the proposal's budget. Applicants should consider including anticipated costs of such an audit if applying for a significant level of funding. DHS does not require any other type of audit; therefore no other audit costs are eligible.

(4) **Renovation Costs:** Renovations to an existing facility are allowable only if the costs comply with the final rule as published in the Federal Register (i.e., limited to minor interior alterations costing less than \$10,000). In order to be eligible, renovations must be essential to the successful completion of the grant scope of work. Environmental and historic preservation requirements may also apply to grants involving renovation activities. Construction costs are not eligible under the Fire Prevention and Safety Grant Program. Construction includes major alterations to a building that changes the profile or footprint of the structure. Note: Installation of fire suppression, fire alarms or detection systems are not considered renovations and accordingly not subject to the limits outlined for renovation costs. The costs however need to be reasonable and justified. Fire departments who are considering installation of suppression, fire alarm or detection systems in a fire department facility are encouraged to apply under the Assistance to Firefighters Grant Program under Modification to Facilities.

(5) **Transportation Costs:** Tow vehicles or other means of transport may be eligible as a transportation expense if adequately justified in the proposal. Transportation expenses are limited to \$6,000 per application.

(6) **Pre-award Costs:** Generally, grantees cannot use grant funds to pay for products and contracted services, or purchases prior to the effective date of the grant. However, expenses incurred after the application deadline but prior to award may be eligible for reimbursement if the expenses were justified, unavoidable, consistent with the grant's scope of work, and specifically approved by DHS. DHS will consider requests for reimbursement for pre-award costs on a case-by-case basis.

(7) **Pre-application Costs:** Expenses, obligations, commitments or contracts incurred or entered into prior to the application deadline are **not** eligible to be included as a grant expense with the exception of grant preparation costs (see (8) below).

(8) **Grant Writer Fees:** Fees for grant writers may be included as a pre-award or preapplication expenditure. However, fees payable on a contingency basis are not an eligible expense that can be charged to the grant. For grant writers' fees to be eligible as a pre-award expenditure, the fees must be specifically identified and listed in the application. In order to be eligible, the fees must also be paid prior to award, (i.e., paid within 60 days of the end of the application period). Applicants may be required to provide documentation to support these pre-award expenditures. The hiring of a grant writer or use of any other third parties in the preparation of the application does not eliminate the applicant's responsibilities for assuring that the information contained in the application is true and correct.

(9) **Personnel Costs**: Due to the maintenance of expenditure requirement, personnel costs are eligible as long as the personnel costs are "new" to the grantee. What is meant by "new" is that the costs would not be incurred if it not for the grant. For example, in a fire prevention program, the grantee might ask staff or firefighters to work overtime to deliver the program during off-duty hours. In this case, the overtime would not have been paid were it not for the fire prevention program. Another example might be hiring of a new staff person to deliver the program -- again, were it not for the fire prevention program, the grantee would not have incurred these new costs. We will not fund any existing positions, (i.e., current staff reassigned to the grant).

(10) Cost Share Requirement: There is no cost share requirement on behalf of the applicant for the FY 2005 Fire Prevention and Safety Grants.

VI. Award Procedure

A panel of reviewers will assess each application's merits with respect to the detail provided in the narrative on the activity including budget information and the rationale used to identify the project. Reviewers will also assess financial need and the purported benefit to be derived from the cost. The panel evaluators will independently score each application and if necessary, discuss the merits/shortcomings of the application to reconcile any major discrepancies. A consensus is not required.

The ranking will be summarized in a Technical Report prepared by the grants program office. The grants program office will make award recommendations to the appropriate Grants Financial staff. The Grants Financial staff will contact the applicant to discuss and/or negotiate the content of the application before making the final award decision.

VII. Grantees' Responsibilities

As indicated earlier in this document, the application for grant will typically be submitted electronically. Award packages are also electronically issued to the applicant. All grant management actions will be done through the web base electronic system as well, including requests for funds or amendments, progress reporting, and submission of grant close out materials. Recipients (Grantees) must agree to:

(1) Maintain operating expenditures for the one-year grant period in the areas funded by this grant activity at a level equal to or greater than the average of their operating expenditures in the two years preceding the year in which this assistance is received. This program is meant to supplement rather than replace the applicants funding.

(2) Retain grant files and supporting documentation for three years after the closeout of the grant.

(3) Grantees are required to follow their own established procurement policies. This will help ensure that all procurement actions are conducted in a manner that provides, to the maximum extent possible, open and free competition. If the organization has no established procedures, at least two quotes/bids for procurement must be obtained. Documentation of the process used must be maintained in a grant file for the period of three years.

(4) Report applicant performance progress made on your grant after six months. At grant closeout, applicants need to provide a final report that includes a fiscal accounting of the funds expended, a narrative discussion of the use of the items purchased or the projects conducted, and a review the benefits to the public and/or the fire service.

(5) Make grant files, books and records available if requested for DHS's inspection to ensure compliance with requirements of the grant program or for subsequent program evaluations authorized by DHS.

(6) If applicant is a fire department they must agree to provide information, through established reporting channels to the U.S. Fire Administration's National Fire Incident Reporting System (NFIRS) for the period covered by the assistance. If a fire department does not currently participate in the incident reporting system and does not have the capacity to report at the time of the award, that grantee must agree to provide information to the system for a twelve-month period commencing as soon as they develop the capacity to report.

(7) **If applicant is a fire department** they must comply with Homeland Security Presidential Directive-5 (HSPD-5). Starting October 1, 2004, HSPD-5 requires that all recipients of Federal preparedness funding – including recipients of Federal grants and contracts – adopt the National Incident Management System (NIMS) as a condition for receipt of the Federal funds. Recipients of FY 2005 AFG funds must comply with this directive (see appendix A). AFG recipients will be considered in compliance with this NIMS requirement if the grantee has an operational knowledge of the Incident Command System (ICS) and an understanding of NIMS' principles and policies. Organizations that have already been trained in ICS do not need re-training if the previous training was consistent with DHS standards. In order for us to document compliance, grantees will be required to certify their recognition of NIMS/ICS as part of their grant closeout process.

DHS offers ICS and NIMS training for those organizations that have not implemented the Incident Command System or those that are unfamiliar with the principles and policies of NIMS. For example, the Federal Emergency Management Agency (FEMA) offers ICS training from introductory courses to advanced ICS training. For more information regarding ICS and NIMS training, visit the NIMS website at <u>www.fema.gov/nims</u>. For more information about ICS training, you could contact DHS's Centralized Scheduling and Information Desk (CSID) at 1-800-368-6498, or visit the website of DHS's Emergency Management Institute (EMI) and the National Fire Academy (NFA) at <u>www.usfa.fema.gov</u>. Your State emergency management training office may also be a source of information in this regard.

(8) Follow the audit requirements of OMB Circular A-133, Audits of States, Local Governments, and Non-profit Organizations, which call for grantees who expend \$500,000 or more in Federal funds in the organizations' fiscal year (from all Federal sources) and perform a single audit. (For more information about the Circulars, go to www.whitehouse.gov/omb/circulars).