



U.S. Department of Justice
Office of Justice Programs
Office of Audit, Assessment, and Management

FY 2010 OJP and COPS Office Programmatic and Financial Monitoring Levels

Monitoring Oversight Report No. 11-01

March 2011

About This Report

The Office of Justice Programs, Office of Audit, Assessment, and Management (OAAM), Program Assessment Division prepared this report. For questions about this report, please contact Ms. Maureen Henneberg, Director of OAAM, at (202) 616-3282.

Acronyms

ARD	Audit and Review Division
BJA	Bureau of Justice Assistance
BJS	Bureau of Justice Statistics
CCDO	Community Capacity Development Office
COPS	Office of Community Oriented Policing Services
DOJ	Department of Justice
GAT	Grant Assessment Tool
GMM	Grant Manager's Manual
GMS	Grants Management System
JAG	Justice Assistance Grant
NIJ	National Institute of Justice
OAAM	Office of Audit, Assessment, and Management
OCFO	Office of the Chief Financial Officer
OJJDP	Office of Juvenile Justice and Delinquency Prevention
OJP	Office of Justice Programs
OVC	Office for Victims of Crime
OVW	Office on Violence Against Women
SMART	Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering and Tracking



Introduction

The Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS Office) in the U.S. Department of Justice (DOJ) administer grants to states and local communities to increase public safety, improve the fair administration of justice across America, and advance the practice of community policing. As a critical component of grant administration, grant monitoring is intended to ensure the fiscal and programmatic integrity and accountability of grantees. Currently, OJP and the COPS Office are responsible for conducting programmatic reviews of grant awards, interacting with grantees to provide technical assistance as needed, and conducting periodic on-site monitoring visits. OJP consists of seven bureaus and offices, collectively referred to as program offices: the Bureau of Justice Assistance (BJA), the Bureau of Justice Statistics (BJS), the Community Capacity Development Office (CCDO), the National Institute of Justice (NIJ), the Office of Juvenile Justice and Delinquency Prevention (OJJDP), the Office for Victims of Crime (OVC), and the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART Office).

Recognizing the need for an increased emphasis on performance-based grant administration, Congress established the Office of Audit, Assessment, and Management (OAAM) as a central source of monitoring oversight. Since FY 2007, OAAM has provided oversight of OJP and the COPS Office monitoring activities. OAAM provides monitoring oversight by tracking monitoring progress to ensure that program offices monitor at least 10 percent of their open award funds annually, as required by Public Law 109-162, "Violence Against Women and Department of Justice Reauthorization Act of 2005." With the passage of "The American Recovery and Reinvestment Act of 2009"¹ (Recovery Act), OAAM was also tasked with providing monitoring oversight for all OJP and the COPS Office Recovery Act awards. In addition, OAAM also tracks financial monitoring conducted by the Office of the Chief Financial Officer (OCFO) throughout the fiscal year.

Each year OAAM reviews monitoring standards and procedures to ensure that they are up-to-date and in accordance with federal legislation and to identify areas for improvement. Beginning in FY 2010, in order to ensure an adequate number of grants receive on-site monitoring, OJP required that program offices monitor at least ten percent of the number of open, active awards as of October 1st of the new fiscal year.² In addition, program offices administering Recovery Act grants are required to monitor 30 percent of the funds awarded over the lifetime of the Recovery Act program, and 10 percent³ of the number of grants for each solicitation or one grant per solicitation, whichever is greater, each year. Improvements are planned for FY 2011, including an increased emphasis on conducting joint on-site monitoring visits between OJP, the COPS Office, OCFO, and the Office on Violence Against Women (OVW), as well as additional monitoring and oversight to those grantees that have been designated as high risk or have received a high monitoring priority

¹ Public Law 111-5

² Due to the large number of awards managed by BJA, this program office is only required to monitor five percent of its open, active awards.

³ Due to the large number of BJA Local Justice Assistance (Local Byrne/JAG) awards, BJA is only required to monitor five percent of the number of open, active Local Byrne/JAG awards.



based on a series of risk factors as identified by grant managers through the Grant Assessment Tool (GAT).

This report, “FY 2010 OJP and COPS Office Programmatic and Financial Monitoring Levels,” discusses the monitoring process, planned FY 2011 improvements to monitoring priorities and procedures, and FY 2010 monitoring statistics for OJP, the COPS Office, and OCFO.



FY 2010 Monitoring at a Glance

Total Completed Monitoring: OJP program offices monitored 1,447 grants totaling \$3.05 billion and the COPS Office monitored 185 grants totaling \$234.74 million. OJP program offices and the COPS Office exceeded the statutory requirement to monitor 10 percent of total award funding. OJP program offices also exceeded the OJP requirement to monitor 10 percent of the total number of open, active grants.

Completed Recovery Act Monitoring: OJP program offices monitored 435 Recovery Act grants totaling \$1.52 billion and the COPS Office monitored 48 Recovery Act grants totaling \$147.47 million. OJP program offices exceeded the requirement to monitor 10 percent of the total number of open, active Recovery Act awards by program and are expected to exceed the requirement to monitor 30 percent of the amount of funds awarded over the lifetime of the Recovery Act.

Grant Assessments: During the FY 2010 initial assessment period, OJP program offices completed risk assessments for 11,893 grants totaling \$8.50 billion, and selected 1,802 grants totaling \$3.42 billion for on-site monitoring.

Planned Monitoring: In FY 2010, OJP planned to monitor 1,802 grants totaling \$3.42 billion and completed on-site monitoring of 1,447 grants totaling \$3.05 billion.

Monitoring with Increased Caseloads: From FY 2009 to FY 2010, the number of open, active grants increased by 28 percent for OJP and 37 percent for the COPS Office. Even with this larger caseload, OJP and the COPS Office increased monitoring from 11 to 12 percent and from 4 to 5 percent of the total number of grants, respectively.

Monitoring by Quarter: Each OJP program office conducted at least 30 percent of its site visits during the fourth quarter of the fiscal year. Across OJP as a whole, only eight percent of on-site monitoring was completed in the first quarter.

High Risk Grantee Monitoring: OJP had 60 grantees with awards totaling \$451.85 million on the high risk list at the beginning of FY 2010. By the end of the fiscal year, OJP conducted on-site monitoring for 20 of these grantees with awards totaling \$232.11 million.

Issues for Resolution: Grant managers recorded issues for resolution for 10 percent of the total number of grants monitored. Grants without issues for resolution may indicate that a grantee is successfully administrating its grants, or may indicate that grant managers are not accurately identifying or recording issues for resolution.

Delinquent Site Visit Reports: Thirty-eight percent of all site visit reports were approved after the 45-day timeframe and considered delinquent. Seventy percent of delinquent site visit reports were submitted by the grant manager to the first line supervisor after the 45-day timeframe.



OJP and the COPS Office Monitoring Process

Programmatic monitoring addresses the performance and substance of grant awards; therefore, OJP and the COPS Office conduct qualitative and quantitative reviews to assess grant performance, innovation, and contributions to the field. The three methods of monitoring grantees are substantive communication, desk reviews, and on-site monitoring visits.

Each fiscal year, OJP and the COPS Office assess grant risk using compliance and performance indicators to determine which grants are most in need of on-site monitoring and use this information to plan on-site monitoring activities accordingly. Grant managers then conduct on-site monitoring visits throughout the fiscal year to review the administrative, financial, and programmatic health of grants and grantees. OAAM tracks and reports these monitoring activities on a quarterly basis to ensure that the COPS Office and OJP program offices are meeting their monitoring requirements.

Each fiscal year, OJP and the COPS Office are required to fulfill a statutory requirement to monitor 10 percent of the total open, active award amount. In addition, OJP is required to monitor 10 percent of the total number of open, active grants⁴. To ensure sufficient monitoring of Recovery Act grants, OJP program offices are also required to monitor ten percent⁵ of the number of grants by program or one grant per program, whichever is greater, ensuring that on-site monitoring is conducted for at least 30 percent of the amount of funds awarded over the lifetime of the Recovery Act program. These requirements are referred to as **required monitoring**. Required monitoring thresholds are based on the total number and award amount of grants that are open and active as of the beginning of the fiscal year. Throughout this report, open, active total award amounts and total number of grants are as of October 1, 2009.

Grant Assessments and Annual Monitoring Plan

To ensure offices meet or exceed required monitoring, and in an effort to encourage priority-based selections for on-site monitoring, OJP program offices and the COPS Office each use a Grant Assessment Tool (GAT) to assess their open, active awards against a set of criteria at the beginning of each fiscal year. OJP program offices also use the GAT to assess any awards that may become open and active during the year (i.e. awards that have a status of “awarded, not yet accepted” or “awarded, acceptance received from grantee” as of the beginning of the fiscal year). In FY 2010, OJP program offices were required to assess at least 50 percent of open, active grants in the GAT. To conduct a GAT assessment, grant managers provide responses to a set of standard risk criteria for each grant (see Appendix I for more information about these criteria). Based on the responses, the GAT assigns each grant a priority score and an associated monitoring priority of high, medium, or low. OJP grant managers are required to make monitoring decisions for all assessed grants and when doing so are encouraged to use the monitoring priority as a guideline while exercising

⁴ Due to the large number of awards managed by BJA, this program office is required to monitor five percent of its open, active awards.

⁵ Due to the large number of Recovery Act grants awarded by BJA, this program office is required to monitor five percent of Local Justice Assistance Grant (JAG) grant programs.



professional discretion. Monitoring decisions for all completed assessments are recorded in the GAT.

The COPS Office maintains its own version of the GAT, using it to assess 100 percent of its open, active grants at the beginning of each fiscal year. The COPS Office GAT is designed to utilize award and organization-level data from multiple COPS Office feeder systems and databases to address risk criteria similar to those used in OJP's GAT. The COPS Office provides OAAM with a monitoring plan based on monitoring decisions made in its tool.

Monitoring decisions made using information from the GAT are the basis for the joint OJP and COPS Office annual programmatic monitoring plan, generated by OAAM and approved by OJP and the COPS Office at the beginning of each fiscal year. OAAM appends OCFO planned financial monitoring to the programmatic monitoring plan, and publishes the programmatic and financial monitoring plan under the Grants Makers Community, Programmatic Grant Monitoring section of the OJP Portal. In addition, the plan is distributed to the COPS Office and OVW. This plan developed at the beginning of the fiscal year, identifying the grants to be monitored, is referred to by OAAM as **planned monitoring**.

Monitoring Activities and Quarterly Updates

Grant managers perform desk reviews on their grants throughout the fiscal year. OJP policy provides that a desk review for each open, active grant should be conducted approximately once every six months, but not less than once annually. If a desk review is part of the preparation for a site visit, grant managers are required to complete the desk review within six months of the site visit start date. For Recovery Act grants, grant managers must complete and upload the "Recovery Act Desk Review and Site Visit Checklist" addendum to the Grants Management System (GMS) in addition to the GAT desk review. The Recovery Act addendum outlines the requirements of the Recovery Act and associated guidance from the Office of Management and Budget.

Throughout the fiscal year, grant managers conduct on-site monitoring visits to collect pertinent administrative, financial, and programmatic information in order to assess grantee performance and compliance with programmatic and federal grant administration requirements. After conducting each site visit, grant managers are required to complete both a site visit report, which documents site visit activities and conclusions, and a post-site visit letter, which outlines issues for resolution and recommendations as needed. If issues for resolution are identified during an on-site monitoring visit, grant managers are responsible for working with grantees to ensure that actions are taken to resolve the issues identified.

At the end of each quarter, OJP program offices, the COPS Office, and OCFO provide OAAM with updates on their monitoring activities. Grant managers make changes to the monitoring plan by changing quarters in which monitoring is planned, adding site visits to the plan, and removing previously planned visits. OJP grant managers use the GAT to make their updates, while the COPS Office and OCFO use tracking spreadsheets. OAAM validates this data and publishes a revised monitoring plan on the OJP Grant Makers Portal each quarter and distributes it to the COPS Office and OVW.



Site Visit Documentation and Reporting

OJP site visit documentation, including site visit reports and post-site visit letters, must be completed and approved in GMS within 45 days of the end of the site visit. OAAM reviews completed site visit data reported by grant managers at the end of each quarter to track and report on OJP's progress towards meeting this monitoring requirement.



FY 2011 Planned Activities

Improved Monitoring Activities

Throughout FY 2010, OAAM identified several opportunities to further improve grant monitoring activities. In FY 2011, OAAM will finalize a revised OJP site visit checklist, evaluate the high risk and high monitoring priority designations, assess issues for resolution, conduct training, and continue to provide OJP program offices with the results of quarterly monitoring performance metrics.

OAAM is working with the Monitoring Working Group⁶ to revise the current OJP site visit checklist to provide a better framework for documenting activities and information reviewed by grant managers while on-site. In addition to the site visit checklist, OAAM is working to improve the process by which issues are identified and reported from a site visit. OAAM will assess how grant managers define, document, and track issues for resolutions identified during desk reviews and site visits. This will allow OAAM to design targeted training to better assist grant managers in identifying, documenting, and resolving these issues.

OAAM will also assess the use and validity of the high risk and high monitoring priority designations in determining whether a site visit should be conducted for particular grants. This will enable OAAM to better define these designations for the FY 2012 initial assessment process, leading to a more targeted monitoring plan.

To improve the grant monitoring process and increase compliance with OJP monitoring policies, OAAM will conduct training as requested by program offices on specific aspects of monitoring activities. Potential areas for training include the workflow for documenting, tracking, and closing issues for resolution, and the revised OJP site visit checklist. OAAM will continue to provide program offices with quarterly updates on monitoring progress, as well as information, as requested, on assessments and desk reviews completed in the GAT. This flow of information will allow program offices to better adjust their monitoring plans throughout the fiscal year as needed, as well as ensure that OJP program offices and the COPS Office meet their required monitoring thresholds.

OJP Monitoring Priorities

In addition to OAAM's planned improvements for 2011, OJP leadership identified two monitoring priorities in the FY 2011 Programmatic Monitoring Guidelines that OJP will focus on in the upcoming year.

Coordination of Joint Site Visits

For the first time, the FY 2011 monitoring plan consolidated the annual plans of OJP program offices, the OCFO, OVW, and the COPS Office. The consolidated DOJ monitoring plan will flag

⁶ The Monitoring Working Group is comprised of employees from each OJP bureau and program office, OCFO, the COPS Office, and OVW.



potential joint site visits that have been planned by multiple offices during the same quarter. For those identified, OJP program offices and the OCFO must work together to determine whether a joint site visit would be beneficial to the grantee and to the OJP offices involved. In instances where the same grantee will be monitored multiple times during the year by different OJP or DOJ offices, but a joint site visit will not be conducted, grant managers must work with the other components to schedule the visits in a manner that minimizes burden on the grantee.

High Risk Grantee Monitoring

Grantees on the DOJ high risk list should be given priority for on-site monitoring. Grantees with outstanding audit issues or identified risk factors (e.g., new grantees, ongoing reporting non-compliance) can benefit from programmatic and/or financial technical assistance to more readily resolve issues and prevent potential problems. When conducting a programmatic site visit on a high risk grantee, the grant manager should request a copy of the designation letter and any available documentation regarding outstanding audits from the OAAM's Audit and Review Division (ARD). In addition, when planning a site visit to a high risk grantee, the program office must contact OCFO to determine whether the grantee would benefit from a joint site visit. In cases when the program office determines that a site visit of a high risk grantee will not be conducted, a justification supporting this decision must be documented in the GAT.



FY 2010 OJP and the COPS Office Overall Monitoring Statistics

In FY 2010, OJP program offices completed on-site monitoring for 1,447 grants and the COPS Office completed on-site monitoring for 185 grants. OJP and the COPS Office exceeded the statutory requirement to monitor 10 percent of total award funding each year; OJP program offices monitored 36 percent (\$3.05 billion) of their open, active award amount and the COPS Office monitored 11 percent (\$234.74 million). In addition, OCFO conducted financial monitoring for 466 grants, totaling \$1.36 billion.⁷ Table 1 below displays FY 2010 completed monitoring for OJP program offices, the COPS Office, and OCFO in terms of award amounts and number of grants monitored throughout the fiscal year.

Table 1. FY 2010 Summary of Completed Monitoring for OJP, the COPS Office, and OCFO

Office	Award Amount Monitored (in Millions)	Number of Grants Monitored
OJP	\$3,049.61	1,447
COPS	\$234.74	185
Total Programmatic	\$3,284.35	1,632
OCFO	\$1,364.20*	466*
Total Programmatic and Financial	\$4,648.55	2,098

*OCFO monitoring totals include grants administered by OJP, the COPS Office, and OVW.

FY 2009 and FY 2010 Completed Monitoring

In FY 2010, OJP exceeded its FY 2009 completed monitoring totals by conducting site visits for 36 percent of its open, active award amount, an increase from 21 percent in FY 2009. This increase is considerable given that the total award amount of open, active grants increased by 25 percent for OJP and 65 percent for the COPS Office between FY 2009 and FY 2010. Even as the total award amount increased, OJP program offices and the COPS Office were able to meet and exceed required monitoring. The COPS Office monitored 11 percent of its open, active award amount in both FY 2009 and FY 2010. Table 2 below compares completed monitoring in FY 2009 and FY 2010 for OJP and the COPS Office.

⁷ OCFO performs financial monitoring for grants administered by OJP, the COPS Office, and OVW. With the exception of financial monitoring conducted by OCFO, OVW monitoring is outside the confines of this report.



Table 2. Comparison of FY 2009 and FY 2010 Completed Monitoring by Award Amount for OJP and the COPS Office (in Millions)

Office	FY 2009			FY 2010		
	Total Amount of Open, Active Awards	Award Amount Monitored	Percent of Total Award Amount	Total Amount of Open, Active Awards	Award Amount Monitored	Percent of Total Award Amount
OJP	\$6,715.03	\$1,396.70	21%	\$8,379.63	\$3,049.61	36%
COPS	\$1,346.32	\$149.48	11%	\$2,224.37	\$234.74	11%

In FY 2010, OJP issued a new policy requiring its program offices to monitor 10 percent of the number of open, active grants each year. Due to the large number of grants managed by BJA, on-site monitoring is required for at least five percent of the number of open, active BJA grants. Though this monitoring requirement did not exist in FY 2009, a comparison between the two years illustrates that OJP program offices conducted monitoring of more than 10 percent of the number of grants in both FY 2009 and FY 2010. Table 3 below details the number of grants monitored in FY 2009 and FY 2010 by OJP program offices and the COPS Office. From FY 2009 to FY 2010, the number of open, active grants increased by 28 percent for OJP and 37 percent for the COPS Office. Even with the increase in the number of open, active grants, the percent of grants monitored increased for both OJP and the COPS Office. The COPS Office is only held to the statutory requirement to monitor 10 percent of their open award funds.

Table 3. Comparison of FY 2009 and FY 2010 Completed Monitoring by Number of Grants for OJP and the COPS Office

Office	FY 2009			FY 2010		
	Total Open, Active Grants	Grants Monitored	Percent of Total	Total Open, Active Grants	Grants Monitored	Percent of Total
OJP	9,693	1,031	11%	12,394	1,447	12%
COPS	2,753	100	4%	3,776	185	5%

Joint Site Visits between OJP, the COPS Office, and OCFO

In FY 2010, OJP and OCFO conducted joint programmatic and financial monitoring site visits to 19 grantees, covering 40 grants and totaling \$281.97 million. The COPS Office did not perform any joint site visits with OCFO in FY 2010. In FY 2011, increased emphasis will be placed on planning and coordination across OJP and among the DOJ grant making components to conduct joint site visits when it is determined that monitoring efforts would be maximized and the burden to the grantee would be minimized.



Recovery Act Monitoring for OJP, the COPS Office, and OCFO

As of October 1, 2009, OJP had 3,471 open, active Recovery Act awards totaling \$2.46 billion and the COPS Office had 1,041 open, active Recovery Act awards totaling \$984.48 million. Table 4 below details the award amounts and number of Recovery Act grants monitored by OJP, the COPS Office, and OCFO in FY 2010. In FY 2010, OCFO conducted financial monitoring for 95 Recovery Act awards totaling \$746.37 million.

Table 4. FY 2010 Completed Recovery Act Monitoring for OJP, the COPS Office, and OCFO

Office	Total Amount of Open, Active Awards (in Millions)	Award Amount Monitored (in Millions)	Number of Open, Active Awards	Number of Awards Monitored
OJP	\$2,459.11	\$1,515.48	3,471	435
COPS	\$984.48	\$147.47	1,041	48
OCFO		\$746.37*		95*

*OCFO Recovery Act monitoring totals include grants administered by OJP, the COPS Office, and OVW.



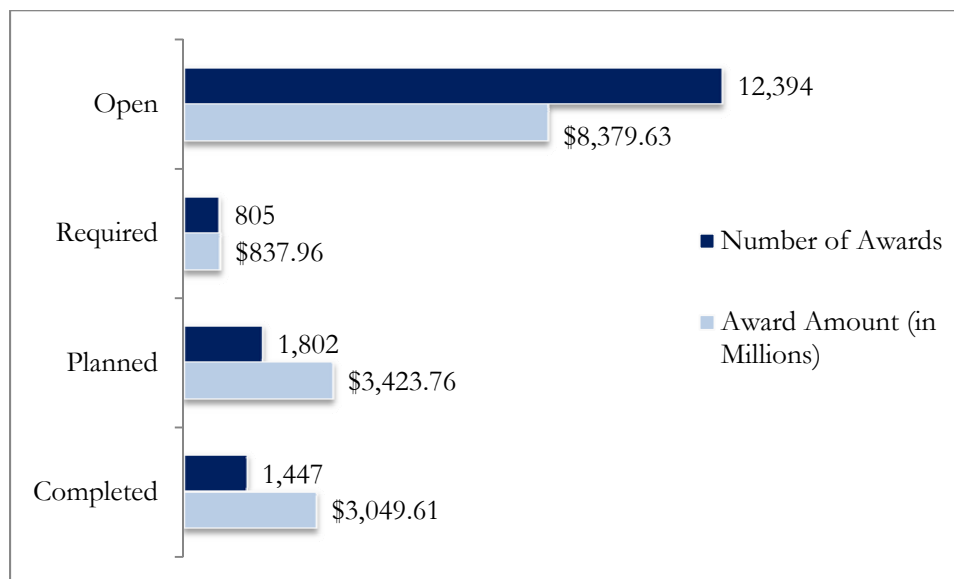
FY 2010 OJP Monitoring Statistics

At the beginning of FY 2010, OJP had 12,394 open, active grants totaling \$8.38 billion.⁸ Based on the 10 percent statutory requirement, the award amount required for monitoring was \$837.96 million. In addition, the OJP policy requirement that program offices conduct on-site monitoring for at least 10 percent of the number of open, active grants (five percent for BJA) resulted in a total monitoring requirement of 805 grants. During the FY 2010 initial assessment period, October 13 to December 4, 2009, OJP assessed 11,893 grants totaling \$8.50 billion, and developed a plan to monitor 1,802 grants totaling \$3.42 billion.⁹

Required, Planned, and Completed Monitoring

By the end of FY 2010, OJP program offices completed 594 on-site monitoring visits, monitoring 1,447 grants totaling \$3.05 billion. The completed award amount monitored exceeded the required level by \$2.21 billion, but was 11 percent (\$374.15 million) less than originally planned. The number of grants monitored exceeded the required number by 642 and similarly to award amount, was 355 grants less than originally planned. Figure 1 below shows FY 2010 open, required, planned, and completed monitoring by award amount and number of grants for OJP.

Figure 1. FY 2010 OJP Open, Required, Planned, and Completed Monitoring by Award Amount and Number of Grants



A comparison of planned and completed monitoring from FY 2008 to FY 2010 is shown in Figure 2 below. In FY 2010, OJP planned to monitor \$3.42 billion and completed on-site monitoring of

⁸ At the beginning of FY 2010, OJP also had 1,718 grants totaling \$746,587,234 that were awarded and not yet accepted, and 77 grants totaling \$46,342,317 that were awarded and accepted but not yet open and active.

⁹ At the beginning of each fiscal year, OJP program offices assess open, active awards as well as awards that may become active during the fiscal year.



\$3.05 billion, or 89 percent of what was originally planned. This is an improvement over FY 2009, when only 52 percent of planned monitoring was completed, and more closely resembles FY 2008, when 83 percent of planned monitoring was completed. Grant managers generally select grants for monitoring based on the results of the risk assessments. Grant managers are held accountable for the grants they originally selected, particularly to those identified as high or medium monitoring priority or have a high risk designation status. For these grants, grant managers are required to document why the visit was not completed. It is important that grant managers be held accountable otherwise the risk assessment process loses its value if grants that were identified as being high priority for monitoring are removed from the plan without sound reasoning. In addition, accurate planning allows OJP to better coordinate potential joint site visits among its program offices and with OCFO.

Figure 2. Comparison of FY 2008, 2009, and 2010 OJP Planned and Completed Monitoring by Award Amount (in Millions)

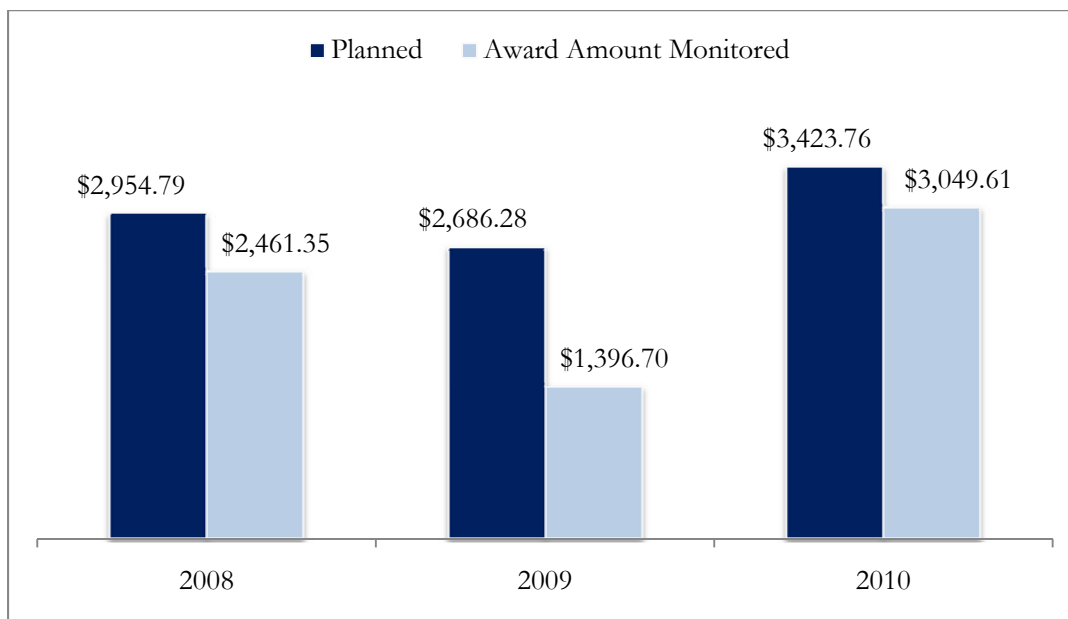


Table 5 presents the amount of open, active awards, required monitoring thresholds, and completed monitoring for each program office. Each program office within OJP individually exceeded the statutory requirement to monitor 10 percent of total funding by the end of FY 2010.

Table 5. FY 2010 OJP Open, Required, and Completed Monitoring by Award Amount (in Millions)

Program Office	Total Amount of Open, Active Awards	Required Monitoring	Completed Monitoring	Exceeded Required Monitoring by
BJA	\$4,760.63	\$476.06	\$1,775.55	\$1,299.49
BJS	\$127.08	\$12.71	\$19.64	\$6.93
CCDO	\$35.95	\$3.60	\$6.80	\$3.21



Program Office	Total Amount of Open, Active Awards	Required Monitoring	Completed Monitoring	Exceeded Required Monitoring by
NIJ	\$566.99	\$56.70	\$156.84	\$100.14
OJJDP	\$1,154.36	\$115.44	\$565.57	\$450.13
OVC	\$1,699.70	\$169.97	\$520.15	\$350.18
SMART	\$34.92	\$3.49	\$5.06	\$1.57
Total	\$8,379.63	\$837.96	\$3,049.61	\$2,211.65

Table 6 below presents the number of open, active grants, required monitoring thresholds, and completed monitoring for each program office. Each program office exceeded the new FY 2010 policy requirement to monitor 10 percent (five percent for BJA) of the number of all open, active grants, even as the total number of open, active grants increased. As a whole, OJP program offices exceeded the required threshold by 642 grants.

Table 6. FY 2010 OJP Open, Required, and Completed Monitoring by Number of Grants

Program Office	Number of Open, Active Grants	Required Monitoring*	Completed Monitoring	Exceeded Required Monitoring by
BJA	8,721	436	611	175
BJS	185	19	36	17
CCDO	217	22	49	27
NIJ	869	87	122	35
OJJDP	1,689	169	488	319
OVC	595	60	128	68
SMART	118	12	13	1
Total	12,394	805	1,447	642

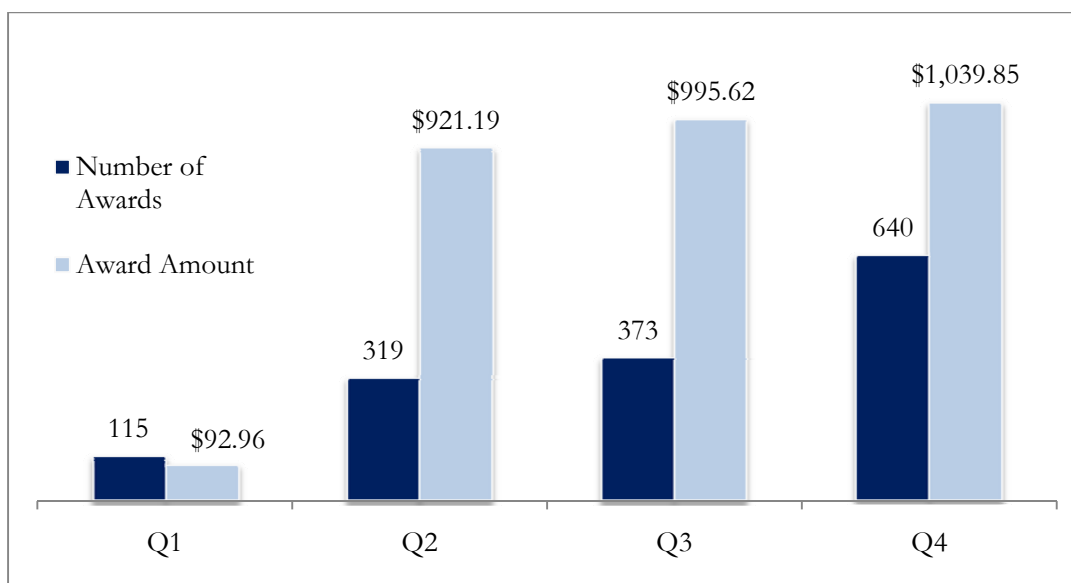
*The required monitoring level for the number of grants is 10 percent of the number of open, active grants each year for all program offices except BJA, for which the required monitoring threshold is five percent.

Quarterly Monitoring Completed

Figure 3 shows the number and amount of awards that were monitored by OJP in each quarter of FY 2010. The smallest proportion of monitoring was completed in the first quarter, while the largest proportion was completed in the fourth. In order to encourage more on-site monitoring visits in the first quarter, the FY 2011 initial assessment period was moved from the beginning of FY 2011 to the end of FY 2010. This allowed OJP, the COPS Office, and OCFO time to create a monitoring plan that maximized the opportunity for joint on-site monitoring visits and that was ready to be implemented at the start of the new fiscal year. Conducting site visits earlier in the fiscal year ensures that newly awarded and accepted grants can be monitored early in their lifetime, enabling grant managers to identify and resolve issues before they result in significant issues for resolution.

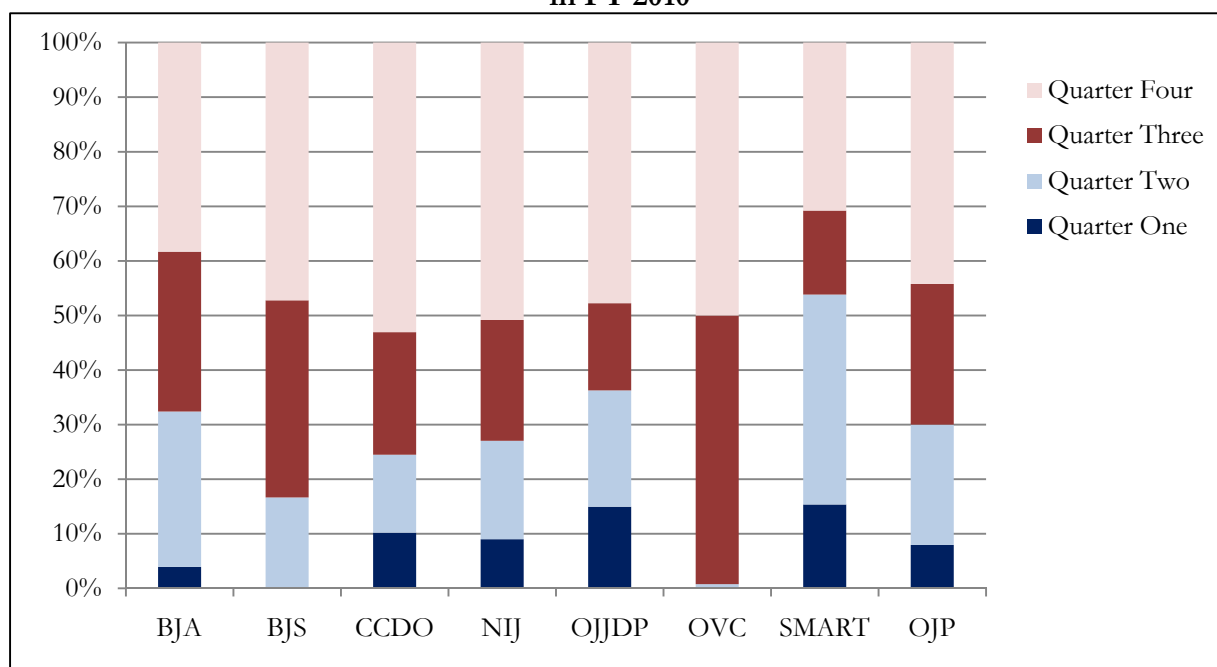


Figure 3. FY 2010 OJP Award Amount (in Millions) and Number of Grants Monitored by Quarter



The trends illustrated in Figure 3 were consistent across OJP’s program offices, presented in Figure 4 below. Each program office conducted at least 30 percent of their monitoring in the fourth quarter, and across OJP as a whole, only 8 percent of monitoring was done in the first quarter. Notably, BJS did not monitor any awards until the second quarter and OVC only monitored one award throughout the first half of FY 2010.

Figure 4. Percent of Total Number of Grants Monitored Each Quarter, by Program Office, in FY 2010





Monitoring Priority

When conducting assessments in the GAT, grant managers assess their open, active awards against a set of risk indicators, and based on their responses, the GAT assigns a priority score and an associated monitoring priority of high, medium, or low. Grant managers use the monitoring priority as a guideline, in addition to professional discretion, when making a monitoring decision. In FY 2010, OJP grant managers assessed 11,893 grants, which resulted in a high monitoring priority rating for 1,085 (9%) grants, a medium priority rating for 5,296 (45%) grants, and a low priority rating for 5,512 (46%) grants.

Table 7 below shows the number of grants monitored by monitoring priority as a percent of the number of grants assessed and number of grants monitored in FY 2010. Of the 1,085 grants identified as high priority, OJP monitored 364, representing 28 percent of the total monitoring conducted on assessed grants. Conversely, low monitoring priority grants made up 46 percent of all assessed grants and accounted for only 36 percent of all grants that were monitored. These differences appear to indicate that grant managers considered the monitoring priority assigned in the GAT when selecting which grants to monitor.

Table 7. FY 2010 OJP Number of Grants Monitored as a Percent of Grants Assessed, by Monitoring Priority

Monitoring Priority	Number of Grants Assessed by Priority	Percent of Grants Assessed by Priority	Number of Grants Monitored by Priority	Percent of Total Assessed Grants Monitored by Priority
High	1,085	9%	364	28%
Medium	5,296	45%	480	37%
Low	5,512	46%	468	36%
Total	11,893	100%	1,312*	100%

*There were an additional 135 grants monitored that were not assessed at the beginning of the fiscal year.

Table 8 below summarizes planned and completed monitoring within each monitoring priority. Of the 1,085 grants identified as a high monitoring priority, 543 (50%) were planned for monitoring and 364 (34%) were ultimately monitored in FY 2010.

Table 8. FY 2010 OJP Number of Grants Assessed, Planned for Monitoring, and Monitored by Monitoring Priority

Monitoring Priority	Grants Assessed by Priority	Grants Planned for Monitoring by Priority	Percent of Grants Planned by Priority	Grants Monitored by Priority*	Percent of Grants Monitored by Priority
High	1,085	543	50%	364	34%
Medium	5,296	672	13%	480	9%
Low	5,512	587	11%	468	8%

*There were an additional 135 grants monitored that were not assessed at the beginning of the fiscal year and thus not included in this table.



In FY 2010, grant managers were required to provide one of five justification comments in the GAT if they chose not to monitor a high or medium priority grant. Table 9 below shows that by far the most common justification comment was “per program office policy or rotation.” Since the reason for choosing this justification comment can vary among or even within program offices, grant managers will be required to provide more detail in 2011 about the program office policy, should they choose this response.

Table 9. Justification Provided by Grant Managers When Choosing Not to Monitor High and Medium Priority Grants

Program Office	About to Expire/ Closeout	New Grant; Too Early to be Visited	Per Program Office Policy or Rotation	Per Random Sampling	Visited Less Than Two Years Ago	Total
BJA	168	445	3,174	332	192	4,311
BJS	4	23	15	2	14	58
CCDO	7	0	8	0	21	36
NIJ	35	67	75	21	14	212
OJJDP	36	28	125	40	23	252
OVC	15	31	116	3	20	185
SMART	3	0	6	0	0	9
Total	268	594	3,519	398	284	5,063

DOJ High Risk Grantees

DOJ designates grantees as high risk based on a number of factors in accordance with criteria established in 28 CFR 66.12, OJP Order 2900.2 and Chapter 10 of the Grant Manager’s Manual. OAAM’s Audit and Review Division coordinates the high risk grantee list and works to either resolve the issues underlying the high risk designation or to impose conditions on high risk grantees to ensure appropriate stewardship of federal funds and enhance programmatic results.

As shown in Table 10 below, OJP had 60 grantees with 283 grants totaling \$451.85 million on the high risk list at the beginning of FY 2010. There are several grantees that have awards in multiple program offices and thus have the potential to be monitored by more than one program office throughout the year. As a result, some grantees are included in the figures for more than one office. However, these grantees are only counted once in the OJP total number of grantees on the high risk list and the OJP total number of high risk grantees monitored.

By the end of the fiscal year, OJP conducted on-site monitoring for 20 of these grantees with 68 grants totaling \$232.11 million, or 51 percent of the total award amount. BJA had active grants with 45 grantees on the high risk list, of which it monitored 13. The only office that did not monitor any grantees on the high risk list was CCDO, which had an active award with one grantee on the high risk list. Since award amounts can be supplemented throughout the year, the award amount monitored as of the end of the year may be more than the total award amount at the beginning of the year (see OJJDP below).



Table 10. FY 2010 OJP Total and Monitored Grantees on the High Risk List

Program Office	Total Award Amount of Grantees on the High Risk List (in Millions)	Award Amount Monitored of Grantees on the High Risk List (in Millions)	Percent of Award Amount Monitored	Total No. of Grantees on the High Risk List*	No. of Grantees on the High Risk List Monitored*	No. of Grants with Grantees on the High Risk List	No. of Grants Monitored with Grantees on the High Risk List
BJA	\$304.55	\$147.56	48%	45	13	165	29
BJS	\$2.35	\$0.69	29%	6	1	12	3
CCDO	\$0.14	\$0.00	0%	1	0	1	0
NIJ	\$8.20	\$0.19	2%	7	1	14	1
OJJDP	\$46.15	\$47.32	103%	16	5	59	29
OVC	\$89.95	\$36.17	40%	8	2	29	5
SMART	\$0.51	\$0.18	35%	3	1	3	1
Total	\$451.85	\$232.11	51%	60	20	283	68

*Grantees can have awards in multiple program offices and have the potential to be monitored by multiple program offices throughout the year.

Site Visit Report Delinquencies

OJP policy states that a site visit package, which consists of a site visit report and a post-site visit letter, is to be submitted by grant managers and approved in the GMS Monitoring Module by the first-line supervisor within 45 calendar days of the on-site monitoring visit end date. The grant manager may create one or multiple reports, and associate multiple awards with each report, but must report on all grants associated with a site visit. Grant managers are required to submit their reports within 45 days as grantees do not receive official notification of the results of the on-site monitoring visit until the report is approved. This means that issues identified during an on-site monitoring visit can remain unknown and uncorrected until the report is approved and the site visit letter is posted.

Table 11 below details the number of completed and delinquent site visit reports by program office. In FY 2010, 38 percent of all site visit reports were submitted after the 45-day timeframe and considered delinquent, with BJA (51%) and OJJDP (45%) having the highest percentages of late reports. BJS submitted 100 percent of its site visit reports within the 45-day timeframe. Of the 224 delinquent site visit packages, 70 percent were submitted by the grant manager after the 45-day timeframe.



Table 11. FY 2010 OJP Number of Delinquent Site Visit Reports by Program Office

Program Office	Total Completed Site Visit Reports	Delinquent Site Visit Reports	Percent of Delinquent Site Visit Reports
BJA	303	154	51%
BJS	18	0	0%
CCDO	38	2	5%
NIJ	85	19	22%
OJJDP	100	45	45%
OVC	38	3	8%
SMART	12	1	8%
Total	594	224	38%

Table 12 details the number of days after the 45-day timeframe that delinquent site visit reports were submitted. While more than half of all delinquent site visit reports were submitted within two weeks of the deadline, 19 site visit packages were submitted and approved between three and six months after the on-site monitoring visit took place, and 10 were submitted more than six months after the end of the on-site monitoring visit.

Table 12. FY 2010 Range of Submission (Measured from 45-Day Timeframe) for Delinquent Site Visit Reports, by Program Office

Program Office	Less Than 2 Weeks	2 Weeks – 1 Month	1 – 3 Months	3 – 6 Months	More than 6 Months	Total Delinquent Reports
BJA	91	16	26	14	7	154
BJS	0	0	0	0	0	0
CCDO	2	0	0	0	0	2
NIJ	6	7	6	0	0	19
OJJDP	15	11	11	5	3	45
OVC	3	0	0	0	0	3
SMART	1	0	0	0	0	1
Total	118	34	43	19	10	224

Issues for Resolution

After an on-site monitoring visit, grant managers must record issues for resolution, defined as any issues requiring action on the part of the grantee, in GMS. These issues are tracked in GMS until they are resolved. Table 13 below shows the number of grants with issues for resolution by program office. Grant managers recorded issues for resolution for 10 percent of the total number of grants monitored. Grants without issues for resolution may indicate that a grantee is successfully administering its grants, or may indicate that grant managers are not accurately identifying or



recording issues for resolution. OAAM has initiated a review of issues for resolution for FY 2011 to better understand the data captured in Table 13.

Table 13. FY 2010 OJP Grants with Issues for Resolution by Program Office

Program Office	Total Number of Grants Monitored	Grants with Issues for Resolution	Percent of Grants with Issues	Number of Total Issues
BJA	611	38	6%	100
BJS	36	2	6%	5
CCDO	49	12	24%	31
NIJ	122	12	10%	21
OJJDP	488	79	16%	232
OVC	128	5	4%	5
SMART	13	0	0%	0
Total	1,447	149	10%	394

Issues for resolution stem from problems identified during financial, administrative, or programmatic review. Financial review requires grant managers to examine grantees' budgets, expenditures, and other financial documents. Administrative review requires grant managers to check that grantees understand administrative information, such as award documentation and certifications, and can produce documentation. Programmatic review consists of grant managers reviewing how grantees are implementing program objectives. Table 14 provides a breakdown of issues for resolution identified in FY 2010 by type. Administrative and programmatic issues are approximately 80 percent of all issues identified by grant managers.

Table 14. FY 2010 OJP Grants with Issues for Resolution by Type of Issue and Program Office

Program Office	Financial Issue	Administrative Issue	Programmatic Issue	Total Number of Issues
BJA	24	50	26	100
BJS	0	0	5	5
CCDO	12	3	16	31
NIJ	8	0	13	21
OJJDP	24	106	102	232
OVC	0	0	5	5
SMART	0	0	0	0
Total	68	159	167	394



Recovery Act Monitoring Statistics

As of October 1, 2009, OJP had 3,471 open, active Recovery Act grants and had allocated a total of \$2.79 billion over the lifetime of the Recovery Act. OJP has additional responsibility to ensure transparency and accountability for Recovery Act grant funds through sufficient monitoring. Therefore, OJP set additional requirements for Recovery Act grants. OJP policy requires that program offices monitor 30 percent of the award amount of grants funded over the lifetime of the Recovery Act program. In addition, program offices are required to monitor ten percent of the number of grants for each solicitation, or one grant per solicitation, whichever is greater, with the exception of the BJA Edward Byrne Memorial JAG Program Local Solicitation, of which five percent of the number of grants must be monitored.

Table 15 shows the total allocated award amount, required monitoring amount, and the award amount of completed monitoring by program office as of the end of FY 2010. All program offices, with the exception of CCDO, have met the Recovery Act monitoring requirement to monitor 30 percent of the lifetime award amount of Recovery Act grants. However, CCDO has until its Recovery Act awards end on July 31, 2011 to fulfill the statutory requirement. The SMART Office does not have any Recovery Act awards and therefore is not reported in the table.

Table 15. FY 2010 OJP Recovery Act Total Allocation, Required, and Completed Monitoring by Award Amount (in Millions)

Program Office	Total Allocated Recovery Act Award Amounts	Required Monitoring*	Completed Monitoring	Percent of Required Monitoring Completed
BJA	\$2,524.17	\$757.25	\$1,392.96	184%
BJS	\$1.00	\$0.30	\$1.00	333%
CCDO	\$1.83	\$0.55	\$0.22	40%
NIJ	\$12.06	\$3.62	\$6.81	188%
OJJDP	\$147.01	\$44.10	\$84.90	193%
OVC	\$107.81	\$32.34	\$34.14	106%
Total	\$2,793.84	\$838.15	\$1,520.02	181%

Table 16 below details the total, required, planned, and monitored number of grants by Recovery Act solicitation. In FY 2010, OJP program offices monitored 435 grants. All OJP program offices met or exceeded their monitoring requirements for number of grants in FY 2010.



Table 16. FY 2010 OJP Number of Recovery Act Grants Monitored by Program Office and Solicitation

Office and Solicitation	Open, Active Grants	Required*	Planned	Grants Monitored
BJA	3,234	176	472	362
Edward Byrne Memorial Competitive Grant Program	61	6	54	41
Combating Criminal Narcotics Activity Stemming from the US Southern Border	17	2	11	5
Edward Byrne Memorial Justice Assistance Grant Program Local Solicitation	2,965	148	268	212
Rural Law Enforcement Assistance: Combating Rural Crime	56	6	47	52
Edward Byrne Memorial Justice Assistance Grant Program State Solicitation	127	13	76	40
Correctional Facilities on Tribal Lands Program	8	1	16	12
BJS	1	1	1	1
Tribal Crime Data Collection, Analysis, and Estimation Project	1	1	1	1
CCDO	1	1	0	1
Edward Byrne Memorial Competitive Grant Program	1	1	0	1
NIJ	13	3	16	13
Evaluation of Internet Child Safety Materials Used by ICAC Task Forces in School & Community Settings	1	1	1	1
Research and Evaluation of Recovery Act State and Local Law Enforcement Assistance	1	1	1	1
Office of Science and Technology Law Enforcement Technology Research and Development	11	1	14	11
OJJDP	96	12	34	25
Internet Crimes Against Children Research Grants	2	1	2	2
Internet Crimes Against Children Task Force Program Grants	59	6	21	16
ICAC Task Force Training and Technical Assistance Grants	6	1	2	2



Office and Solicitation	Open, Active Grants	Required*	Planned	Grants Monitored
Local Youth Mentoring Initiative	25	3	7	3
National Youth Mentoring Initiative	4	1	2	2
OVC	126	13	34	33
Edward Byrne Memorial Competitive Grant Program	8	1	6	5
National Field Generated Training, Technical Assistance, and Demonstration Projects	9	1	3	2
Victims of Crime Act Victim Assistance Formula Grant Program	56	6	12	14
Victims of Crime Act Victim Compensation Formula Grant Program	53	5	13	12
Total	3,471	206	557	435

*The required monitoring level for the number of grants is 10 percent of the number of open, active grants, or one grant (whichever is greater) each year for all program offices except BJA, for which the required monitoring level is five percent.



Appendix I

FY 2010 Standard Risk Indicators

Risk Indicator	Description
Grantee Organization	Select Yes if grantee organization is an Indian Tribe, For-Profit, Faith-based or Individual.
Matching Funds, Program Income, or Interest	Select Yes if the grantee's grant program: <ul style="list-style-type: none"> • has a matching funds or program income requirement of greater than 25% of the entire award; or • has matching funds, interest income or program income above and beyond what is required.
New Purpose Area or Program	Select Yes if a grant program: <ul style="list-style-type: none"> • employs an innovative or untested design; or • circumvents the merit-based competitive application process (i.e., Congressional Earmark); or • is an American Recovery and Reinvestment Act (Recovery Act) program considered by your office to be a new program.
Innovative Best Practice Potential or Demonstration Grant	Select Yes if a grant program is a demonstration grant or possesses a promising practice. For example, a grantee possessing a promising practice can include, but is not limited to, a grantee: <ul style="list-style-type: none"> • who could/will be included in your annual report to Congress; • whose practice(s) could be replicated across other grantees; or • whose practice(s) have been or could/will be cited in peer reviewed journals.
External Review	Select Yes if grantee has significant open, unresolved audit findings (financial and/or programmatic). This includes two types of audits: <ul style="list-style-type: none"> • OMB Circular A-133 single audits, which are performed pursuant to the Single Audit Act of 1984 (P.L., 98-502), as amended by the Single Audit Act Amendments of 1996 (P.L.104-156); and • Audits performed by the DOJ Office of the Inspector General (OIG).



Risk Indicator	Description
Special Conditions Indicators	<p>Select “High” if a grantee:</p> <ul style="list-style-type: none"> • is not in compliance with award special conditions; or • has restrictive award special conditions due to issues with past performance (e.g., complex special condition initiated by OGC, or a condition related to withholding of funds). <p>Select “Medium” if grantee has a grant with a high number of special conditions or removable special conditions (above the standard for grant program or specific bureau or program office).</p> <p>Select “Low” if grantee has been noncompliant with award special conditions within the past two years (but is currently compliant).</p> <p>Select “N/A” if the standard award special conditions exist and grantee is in compliance with the award special conditions.</p>
Performance Measures	<p>Select “High” if a grantee:</p> <ul style="list-style-type: none"> • has low quality and/or inadequate performance measurement data and is not taking appropriate action to address performance data issues; or • does not submit required performance measurement data. <p>Select “Medium” if a grantee has low quality and/or inadequate performance measurement data, but is taking appropriate action to address data issues.</p> <p>Select “Low” if a grantee has prior history (within past 12-18 months) of low quality and/or inadequate performance measurement data, but has since resolved these issues.</p> <p>Select “N/A” if quality, adequate performance measurement data have been submitted as required.</p>
Concerns from Prior Desk Reviews and/or Monitoring Visits	<p>Select “High” if:</p> <ul style="list-style-type: none"> • serious concerns from prior desk reviews and/or monitoring visits remain unresolved; or • there is evidence of poor performance or egregious noncompliance. <p>Select “Medium” if serious concerns from prior desk reviews and/or monitoring visits have been resolved within the past year.</p> <p>Select “Low” if concerns from prior desk reviews and/or monitoring visits remain unresolved, but are not serious in nature.</p> <p>Select “N/A” if there are no concerns from prior desk reviews or monitoring visits.</p>



Risk Indicator	Description
<p>Nonresponsive Grantee</p>	<p>Select “High” if grantee is:</p> <ul style="list-style-type: none"> • currently non-responsive to office requests; or • has been repeatedly non-responsive to office requests within the past year. <p>Select “Medium” if grantee currently acknowledges office requests, but has not responded adequately.</p> <p>Select “Low” if grantee is currently responsive to office requests, but has been non-responsive within the past year.</p> <p>Select “N/A” if the grantee has been responsive.</p> <p>For example, grantees should generally be responsive to GANS within 15 calendar days, information requests within a week, or monitoring site visit corrective actions within the time specified in the follow-up letter.</p>
<p>High Profile/Sensitive Grants</p>	<p>Select “High” if the grant, program, or subject matter:</p> <ul style="list-style-type: none"> • involves intense scrutiny by the Administration, Congress, media, Department, or Office that makes it high profile or sensitive, or • is funded by the Recovery Act (due to high visibility). <p>Select “Medium” if the grant, program, or subject matter involves significant, but not intense, scrutiny by the Administration, Congress, media, Department, or Office that makes it high profile or sensitive.</p> <p>Select “Low” if there are some sensitivities or high profile elements to the grant, program, or subject matter, but does not involve intense or significant scrutiny.</p> <p>Select “N/A” if the grant, program, or subject matter is not considered to be high profile or sensitive.</p>



Risk Indicator	Description
Financial Status Report Indicators	<p>Select “High” if, within the past year, the grantee has repeatedly:</p> <ul style="list-style-type: none"> • not submitted a current Financial Status Report (FSR) by the established due date or by an extended due date established in advance of the original due date; or • submitted an FSR that is incomplete or inaccurate (same mistake made repeatedly or a mistake that appears to be deceptive); or • has demonstrated an inability to meet matching funds, program income or interest requirements or accurately report on them; or • had funds frozen in GMS; or • not met the financial requirements of the grant/award or has spending patterns indicating unusually high rates of spending. <p>Select “Medium” if the grantee does not have a history of late, incomplete, or inaccurate Financial Status Reports (FSRs), but:</p> <ul style="list-style-type: none"> • is currently delinquent in submitting an FSR; or • has submitted a recent FSR that is incomplete or has obvious errors that require it to be resubmitted; or • is not meeting the financial requirements of the grant/award or has spending patterns indicating unusually high rates of spending. <p>Select “Low” if the grantee does not have a history of late, incomplete, or inaccurate Financial Status Reports (FSRs), but, within the past year:</p> <ul style="list-style-type: none"> • was delinquent in submitting an FSR by the established due date or by an extended due date established in advance of the original due date; or • submitted an FSR that was incomplete or contained errors; or • did not meet the financial requirements of the grant/award or had spending patterns indicating unusually high rates of spending (determined via review of progress report, federal outlays on FSR and approved budget). <p>Select “N/A” if there are no financial status report indicators.</p>



Risk Indicator	Description
<p>Programmatic Report Indicators</p>	<p>Select “High” if, within the past year, the grantee has repeatedly:</p> <ul style="list-style-type: none"> • not submitted a programmatic report by the established due date or by an extended due date established in advance of the original due date; or • submitted a programmatic report that is incomplete or inaccurate; or • been unresponsive to change requests or • failed to produce agreed upon deliverables; or • submitted a tangible work product such as a report, or training curriculum, that was of low quality; and • failed to improve deliverables or address concerns as communicated with the grantee in key correspondence. <p>Select “Medium” if the grantee does not have a history of late, incomplete, or inaccurate Programmatic Reports, but:</p> <ul style="list-style-type: none"> • is currently delinquent in submitting a report; • submitted a recent report that is incomplete or inaccurate; • has been unresponsive to change requests; or • has repeatedly submitted a tangible work product such as a report or training curriculum that was of low quality but has improved deliverables or addressed concerns as communicated with the grantee in key correspondence. <p>Select “Low” if the grantee does not have a history of late, incomplete, or inaccurate programmatic reports, but, within the past year:</p> <ul style="list-style-type: none"> • was delinquent in submitting a report; • submitted a report that was incomplete or inaccurate; or • submitted a tangible work product such as a report or training curriculum that was of low quality; but improved the quality of the deliverable or future deliverables once addressed with the grantee in key correspondence. <p>Programmatic reports may include general program reports, annual reports, strategic reports, progress reports, or economic performance measures specific to Recovery Act grants. The determination of what constitutes quality deliverables must be determined on a per-program basis and applied consistently to all grantees under that program or fiscal operation and/or management of the grant or project.</p>



Risk Indicator	Description
<p>High Risk Grantee</p>	<p>The system shall automatically populate the criteria of “High” if the grantee is on the OJP High Risk list based on prior year audits and investigations in accordance with criteria established in 28 CFR 66.12, OJP Order 2900.2 and the Grant Manager Manual, Chapter 10. If the system populates a “High” response, the associated award’s monitoring priority will automatically be marked as High.</p> <p>High-risk criteria used to designate a grantee as high-risk are broadly defined in 28 C.R.F. § 66.12. At present, such criteria include the following: A history of unsatisfactory performance; Not financially stable; A management system that does not meet the management standards set forth in 28 C.F.R. § 66.20 (standards for financial management systems); Non-conformity to terms and conditions of previous awards; or Otherwise not responsible.</p> <p>The information used to pre-populate this criterion is maintained by the OAAM Audit and Review Division (ARD). Questions regarding this information should be directed to your office’s High Risk Designation Approving Official.</p> <p>The system shall automatically populate the criteria of “Medium Risk” if the grantee:</p> <ul style="list-style-type: none"> • is considered at risk and has been placed on the watch list; or • has been removed from the High Risk Grantee list in the last twelve months. If the system populates a “Medium” response, the associated award’s monitoring priority will automatically be marked as at least a Medium. <p>The system shall automatically populate the criteria of “N/A” if the grantee is not currently on the High Risk Grantee or Watch List, and has not been on the High Risk list in the past twelve months.</p>
<p>Implementation Issues</p>	<p>Select “High” if:</p> <ul style="list-style-type: none"> • there are currently serious concerns related to the implementation of the program and ability to meet program objectives; or • the grantee repeatedly requests scope changes, key personnel changes, or project budget modifications. <p>Select “Medium” if concerns related to implementation of the program are currently being addressed in what appears to be an adequate fashion, but are not yet resolved.</p> <p>Select “Low” if concerns related to the implementation of the program have been resolved within the past year.</p> <p>Select “N/A” if there have been no concerns related to the implementation of the program within the past year.</p>



Risk Indicator	Description
Complexity of Award	<p>Select “High” if grant program is complex compared to other programs, requiring additional oversight.</p> <p>Examples of complex programs/awards include:</p> <ul style="list-style-type: none"> • awards with several distinct purpose areas and many MOUs or SLAs; • TA grantees providing assistance in five different subject areas; or • awards with several distinct purpose areas that involves frequent government interactions (i.e., multiple sub-awards requiring subrecipient monitoring). <p>Select “Medium” if grant program is moderately complex, compared to other programs.</p> <ul style="list-style-type: none"> • Examples include a cooperative agreement with several distinct purpose areas or many MOUs or SLAs. <p>Select “Low” if program complexity is low, compared to other programs.</p>

FY 2010 Office Specific Risk Indicators

Risk Indicator	Description	Program Office
Awards Open > 3 Years	<p>The system shall automatically populate desk review criteria response of “Yes” if award has been open longer than 36 months.</p> <p>The system shall automatically populate desk review criteria response of “No” if award has been open less than 36 months, based on calculation of time between Initial Award Date and October 1st of current fiscal year.</p>	BJA
Grantees With Multiple Active Awards	<p>The system shall automatically populate desk review criteria response of “High” if the grantee has more than 5 active awards within the program office.</p> <p>The system shall automatically populate desk review criteria response of “Medium” if the grantee has between 3 and 5 active awards within the program office.</p> <p>The system shall automatically populate desk review criteria response of “Low” if the grantee has 2 or 3 active awards within the program office.</p> <p>The system shall automatically populate desk review criteria response of “NA” if the grantee has 1 active award within the program office.</p>	BJA
Grants With No Financial Clearances	<p>The system shall automatically populate desk review criteria response of “Yes” if award does not have a financial clearance memo in GMS.</p> <p>The system shall automatically populate desk review criteria response of “No” if award has a financial clearance memo in GMS.</p>	BJA



Risk Indicator	Description	Program Office
Dollar Value of Award	<p>The system shall automatically populate desk review criteria response of “High” if grant award amount is greater than or equal to \$1,000,000.</p> <p>The system shall automatically populate desk review criteria response of “Medium” if grant award amount ranges between \$250,000 and \$999,999,999.</p> <p>The system shall automatically populate desk review criteria response of “Low” if grant award amount ranges between \$100,000 and \$249,999.</p> <p>The system shall automatically populate desk review criteria response of “NA” if grant award amount is less than \$100,000.</p>	BJA
OJP Grantees With First Award Within Past 5 Years	<p>The system shall automatically populate desk review criteria response of “Yes” if the grantee organization is receiving its first award in the past five years.</p> <p>The system shall automatically populate desk review criteria response of “No” if this is not the first award the grantee organization has received within the past five years.</p>	BJA
Grantee Conducting Data Collection and Other Statistical Activities	<p>Select “Yes” if, under a cooperative agreement, BJS is providing information, guidance, and direction relative to the conduct of data collections and the development of statistical studies.</p> <p>Otherwise, select “No.”</p>	BJS
Awards With Unobligated Balances	<p>The system shall automatically populate desk review criteria response of “High” if more than \$300,000 in unobligated funds for sites with 2 open grants more than \$400,000 for a site with 3 or more open grants.</p> <p>The system shall automatically populate desk review criteria response of “Medium” if between \$200,000 and \$300,000 unobligated funds for sites with 2 open grants and between \$300,000 and \$400,000 for a site with 3 or more open grants.</p> <p>The system shall automatically populate desk review criteria response of “Low” if less than \$200,000 in unobligated funds for site with 2 or more open grants and less than \$300,000 for a site 3 or more open grants.</p>	CCDO
Statutory Limit of \$1,000,000	<p>Select “Yes” if the \$1,000,000 limit will impact the site's funding (if eligible) for this fiscal year.</p> <p>Weed and Seed authorizing legislation states that "A community may not receive grants in an aggregate amount of more than \$1,000,000, except that the Assistant Attorney General may, upon a showing of extraordinary circumstances, authorize grants for not more than an additional \$500,000."</p> <p>Otherwise, select “No.”</p>	CCDO
Fiscal Agency Serving More than One Site	<p>Select “Yes” if the grantee is managing more than one site. For example, the fiscal agent may be the grantee for a new site, expansion site, as well as an existing site. To ensure funds are not commingled among projects, as well as meeting the criteria set forth for sustainment of efforts, it may be necessary to conduct a monitoring visit.</p> <p>Otherwise, select “No.”</p>	CCDO



Risk Indicator	Description	Program Office
Grantee Awards Mini-grants	Select “Yes” if a grantee has received federal grant funds for the purpose of awarding mini-grants (subgrants) for criminal justice purposes. Mini-grants made for anything other than criminal justice purposes are deemed as unallowable expenses. These circumstances lead to an inherent vulnerability associated with safeguarding Federal dollars awarded through mini-grants. Otherwise, select “No.”	CCDO
Meeting Benchmarks	Select “High” if grantee is meeting less than 1/2 of the Benchmarks. Select “Medium” if grantee is meeting greater than or equal to 1/2 but not less than 3/4 of the Benchmarks. Select “Low” if grantee is meeting greater than or equal to 3/4 (but not all) of Benchmarks Select “N/A” if grantee is meeting all Benchmarks. This criterion focuses on the successful and sustainable achievement of certain goals by the end of each year of Weed and Seed designation. The benchmarks reflect the level at which a site should be performing on an annual basis and are also used in future funding consideration.	CCDO
Human Subjects, Privacy or Animal Testing Issues	Select “Yes” if grantee’s grant program: <ul style="list-style-type: none"> • is at risk of violating Human Subjects requirements; or • has significant Privacy issues; or • involves Animal Testing. Otherwise, select “No.”	NIJ
Cumulative Award Amount	Select “Yes” if grantee’s grant program has received a cumulative award amount that is equal to or greater than \$10,000,000. Otherwise, select “No.”	NIJ



Risk Indicator	Description	Program Office
<p>Final Technical Report Indicators</p>	<p>Select “High” if the grantee has:</p> <ul style="list-style-type: none"> failed to submit a Final Technical report on a previous grant; or submitted a Final Technical report that is incomplete or inaccurate; or been unresponsive to updating a Final Technical report to reflect reasonable changes identified during the peer review process. <p>Select “Medium” if the grantee does not have a history of failure to submit a Final Technical report, but:</p> <ul style="list-style-type: none"> is currently delinquent in submitting a report; or submitted a recent report that is incomplete or inaccurate; or has been unresponsive to change requests. <p>Select “Low” if the grantee does not have a history of submitting late, incomplete, or inaccurate Final Technical reports, but within the past 3-4 years:</p> <ul style="list-style-type: none"> was delinquent in submitting a report; or submitted a report that was incomplete or inaccurate. <p>Select “N/A” if there are no Final Technical report indicators.</p> <p>Final Technical reports are those that are required by the Program Office at award closeout.</p>	<p>NIJ</p>
<p>Data Set Indicators</p>	<p>Select “High” if the grantee has:</p> <ul style="list-style-type: none"> failed to submit a required Data Set on a previous grant; or submitted a required Data Set that is incomplete or inaccurate; or been unresponsive to updating a required Data Set to reflect reasonable changes identified during the peer review process. <p>Select “Medium” if the grantee does not have a history of failure to submit a required Data Set, but:</p> <ul style="list-style-type: none"> is currently delinquent in submitting a Data Set; or submitted a recent Data Set that is incomplete or inaccurate; or has been unresponsive to change requests. <p>Select “Low” if the grantee does not have a history of submitting late, incomplete, or inaccurate Data Sets, but within the past year:</p> <ul style="list-style-type: none"> was delinquent in submitting a Data Set; or submitted a Data Set that was incomplete or inaccurate. <p>Select “N/A” if there are no Data Set indicators.</p> <p>Data Sets are those that are required by the Program Office at award closeout.</p>	<p>NIJ</p>



Risk Indicator	Description	Program Office
Grantees With Multiple Active Awards	<p>The system shall automatically populate desk review criteria response of “High” if the grantee has more than 5 active awards within the program office.</p> <p>The system shall automatically populate desk review criteria response of “Medium” if the grantee has between 3 and 5 active awards within the program office.</p> <p>The system shall automatically populate desk review criteria response of “Low” if the grantee has 2 or 3 active awards within the program office.</p> <p>The system shall automatically populate desk review criteria response of “NA” if the grantee has 1 active award within the program office.</p>	NIJ
Grantees Requiring Training and/or Technical Assistance	<p>Select “High” if the grantee requires significant training and/or technical assistance, as indicated by grantee initiating a large amount of contact with program manager, DCTAT contractor, TA provider, or by program manager observing that grantee requires a significant amount of training and/or technical assistance.</p> <p>Select “Medium” if the grantee requires serious but less significant training and/or technical assistance; contact with the program manager, DCTAT contractor, or TA provider is regular but not intensive.</p> <p>Select “Low” if the grantee requires some training and/or technical assistance; grant initiates contact with program manager, DCTAT contractor, or TA provider, but contact is infrequent.</p> <p>The determination of what constitutes significant oversight must be determined by the program manager and applied evenly to all grantees and grant programs.</p>	OJJDP
Grantees With Multiple Active OJJDP Awards	<p>The system shall automatically populate desk review criteria response of “High” if the grantee has more than 5 active awards within OJJDP.</p> <p>The system shall automatically populate desk review criteria response of “Medium” if the grantee has between 3 and 5 active awards within OJJDP.</p> <p>The system shall automatically populate desk review criteria response of “Low” if the grantee has less than 3 active awards within OJJDP.</p>	OJJDP
ARRA Only— Noncompliant with <u>FederalReporting.gov</u> Reporting Requirements	<p>Select “Yes” if the grantee has missed the <u>FederalReporting.gov</u> reporting deadline to post data 10 calendar days after the start of each quarter at least once in the past 12 months.</p> <p>Otherwise, select “No.” This question applies ONLY to American Recovery and Reinvestment Act grants.</p>	OJJDP
ARRA Only— Inaccurate Job Creation/Retention Figures	<p>Select “Yes” if the grantee has not hired enough employees to meet the jobs created/retained targets listed in its application, or does not have evidence that these positions will be hired later in the project period.</p> <p>Otherwise, select “No.” This question applies ONLY to American Recovery and Reinvestment Act grants.</p>	OJJDP



Risk Indicator	Description	Program Office
Trafficking Grantees That Have Submitted an Approved Training and Evaluation Plan For the Required 10% Set Aside	Select "Yes" if the grantee has submitted an approved training and evaluation plan for the required 10% set-aside. Otherwise, select "No."	OVC
Grantees With 3 or More Active Awards	The system shall automatically populate desk review criteria response of "Yes" if the grantee has 3 or more active SMART awards. The system shall automatically populate desk review criteria response of "No" if the grantee has 2 or fewer active SMART awards	SMART