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FY 2011 OJP and COPS Office Programmatic and Financial Monitoring Levels

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About This Report

The Office of Justice Programs, Office of Audit, Assessment, and Management (OAAM), Program Assessment Division prepared this report. For questions regarding the content or distribution of this report, please contact 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
EPDR	Enhanced Programmatic Desk Review
GAT	Grant Assessment Tool
GMM	Grant Manager's Manual
GMS	Grants Management System
JAG	Justice Assistance Grant Program
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, local, and tribal 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 financial and programmatic integrity and accountability of grantees. Currently, OJP and the COPS Office are responsible for conducting programmatic and financial reviews of grant awards, interacting with grantees to provide technical assistance as needed, and conducting periodic in-depth monitoring visits. While the COPS Office is a single organizational entity, OJP consists of six¹ bureaus and offices, collectively referred to as program offices: the Bureau of Justice Assistance (BJA), the Bureau of Justice Statistics (BJS), 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" (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. In FY 2011, in an effort to continuously improve monitoring standards and procedures and to respond to issues identified throughout the year, OAAM

¹ Federal funding reductions in FY 2011 included the Community Capacity Development Office's (CCDO) Weed and Seed Program. Without funding for this program, CCDO closed. Effective June 6, 2011, all remaining open, active CCDO grants were transferred to BJA. Former CCDO staff assigned to BJA worked to meet the CCDO monitoring targets for FY 2011.



completed several major projects that further enhanced the monitoring oversight of OJP and COPS Office programs. In coordination with OCFO, OAAM developed a “Monitoring Plan B”² in April 2011 in response to the freeze on most travel. OAAM also continued to improve the quality and completeness of grant monitoring through the revision of the FY 2012 OJP Site Visit Checklist, enhanced desk review checklist, and a redesigned Grant Assessment Tool (GAT). Last, OAAM revised the site visit quality review process, which is being implemented in FY 2012 to assess areas for improvement in site visit documentation and report quality. Throughout FY 2011, OAAM identified several, opportunities to further improve grant monitoring activities. In FY 2012, OAAM is assessing the use and validity of the automated risk assessment process, conducting quarterly risk assessment activities on grantees that have been designated as DOJ high-risk grantees, implementing the site visit quality review process, and continuing to provide OJP program offices with the results of quarterly monitoring performance metrics.

This report, “FY 2011 OJP and COPS Office Programmatic and Financial Monitoring Levels,” discusses the monitoring process, FY 2012 improvements to monitoring priorities and procedures, and FY 2011 monitoring statistics for OJP, the COPS Office, and OCFO.

² In FY 2011, as a result of the full-year Continuing Resolution, there was a freeze on most OJP travel; including travel for monitoring, grantee training, programmatic conferences, and other programmatic travel. In order to fulfill OJP’s statutory monitoring requirements and internal targets, as well as continue to provide thorough and comprehensive monitoring and oversight, the OJP monitoring plan had to be revised. The alternative monitoring approach, referred to as “Monitoring Plan B,” emphasized monitoring grantees with overall risk to OJP through joint site visits, remote monitoring, and visits to local grantees. Note: the COPS office’s programmatic monitoring travel budget was not reduced in FY 2011 and therefore, they were able to continue with their original on-site monitoring plans.



FY 2011 Monitoring at a Glance

Total Completed Monitoring OJP program offices completed in-depth monitoring of 1,121 grants totaling \$2.24 billion, and the COPS Office monitored 230 grants totaling \$267.92 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. In addition, OCFO completed financial monitoring for 471 grants totaling \$2.91 billion. In total, OJP and the COPS Office conducted programmatic and/or financial monitoring on 1,609 grants, totaling \$3,297.78 million.

Completed Recovery Act Monitoring OJP program offices monitored 270 Recovery Act grants totaling \$958.38 million, and the COPS Office monitored 62 Recovery Act grants totaling \$124.23 million. OJP program offices exceeded the requirement to monitor 10 percent of the total number of open, active Recovery Act awards by program and exceeded the requirement to monitor 30 percent of the amount of funds awarded over the lifetime of the Recovery Act. In addition, OCFO completed financial monitoring for 89 Recovery Act grants totaling \$785.31 million.

High-Risk Grantee Monitoring OJP and the COPS Office had 68 grantees with awards totaling \$335.04 million on the DOJ high-risk list at the beginning of FY 2011. By the end of the fiscal year, OJP and the COPS Office conducted in-depth monitoring for 18 of these grantees with awards totaling \$118.32 million.

Grant Risk Assessments During the initial FY 2011 assessment period, OJP program offices completed risk assessments for 7,350 grants totaling \$7.87 billion and selected 1,346 grants totaling \$2.26 billion for in-depth monitoring.

Planned versus Actual Monitoring In FY 2011, OJP planned to monitor 1,346 grants totaling \$2.26 billion and completed in-depth monitoring of 1,121 grants totaling \$2.24 billion.

Desk Reviews Each year, OJP program offices are responsible for completing a desk review for every open, active grant. In FY 2011, OJP program offices conducted desk reviews on 15,667 grants, 7,350 during the initial assessment period, and an additional 8,317 desk reviews throughout the rest of the fiscal year.

Monitoring by Quarter The fewest number of grants was monitored in the first quarter of FY 2011, representing 16 percent of the total number of grants monitored



during the fiscal year. However, this was a 55 percent increase over the number of grants monitored during the first quarter of FY 2010. The largest number of grants was monitored in the fourth quarter.

Issues for Resolution Grant managers recorded issues for resolution for 8 percent of the total number of grants monitored in FY 2011. Grants without issues for resolution may indicate that a grantee was successfully administrating its grants or that grant managers were not accurately identifying or recording issues for resolution. OAAM will continue to review how grant managers are identifying and recording issues for resolution throughout FY 2012.

Delinquent Site Visit Reports Forty-eight percent (244) of all site visit reports were approved after the 45-day timeframe and considered delinquent. Of those, 70 percent (171) were submitted by the grant manager to the first-line supervisor after the 45-day timeframe.



OJP and the COPS Office Monitoring Process

Proactive monitoring activities ensure the financial and programmatic integrity and accountability of their grantees, and assist grantees in implementing approved programs within a framework of relevant statutes, regulations, policies, and guidelines pertaining to grant programs. OJP program offices and the COPS Office are responsible for monitoring their grants and grant programs, which must include the review of the programmatic, financial, and administrative elements of their grants. The three methods of monitoring grantees are substantive communication, desk reviews, and in-depth monitoring, which includes on-site visits and remote monitoring activities.

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 grants.³ To ensure sufficient monitoring of Recovery Act grants, OJP program offices are also required to monitor 10 percent⁴ of the number of grants by program or one grant per program, whichever is greater, ensuring that in-depth 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, monitoring thresholds are based on open, active total award amounts and total number of grants as of October 1, 2010.

Grant Assessments and Annual Monitoring Plan

To ensure offices meet or exceed required monitoring, and in an effort to encourage priority-based selections for in-depth monitoring, OJP program offices and the COPS Office 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 2011, OJP program offices⁵ were required to assess all open, active awards, with the exception of grants awarded after

³ Due to its large number of awards, BJA is required to monitor 5 percent of its open, active awards.

⁴ Due to the large number of Recovery Act grants awarded by BJA, it is required to monitor 5 percent of local Justice Assistance Grant (JAG) programs.

⁵ Due to the large number of awards managed, BJA was required to assess the following grants; all grants with grantees on the DOJ High-Risk list, all grants with awards greater than or equal to \$1 million, 25 percent of remaining Recovery Act grants, and 25 percent of remaining non-Recovery Act grants.



July 1, 2010 and grants closing on or before September 30, 2010. To conduct a GAT assessment in FY 2011, grant managers provided 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 assigned each grant a priority score and an associated monitoring priority of high, medium, or low. OJP grant managers were required to make monitoring decisions for all assessed grants and, when doing so, were encouraged to use the monitoring priority as a guideline while exercising professional discretion. Monitoring decisions for all completed assessments are recorded in the GAT.

The COPS Office maintains its own version of the GAT 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 the OJP 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 DOJ Programmatic and Financial Monitoring Plan. In FY 2011, OAAM worked closely with OJP program offices, the COPS Office, the Office on Violence Against Women (OVW), and OCFO to better coordinate monitoring plans to ensure that an optimum number of joint site visits were conducted. OAAM recommended that OJP's annual programmatic monitoring plans be completed two months earlier than in previous years to coincide with the development of the financial monitoring plan and provide more time for the coordination of site visits prior to the start of the new fiscal year. This plan, which is developed at the beginning of the fiscal year and identifies grants to be monitored, is referred to by OAAM as *planned monitoring*.

Monitoring Activities and Quarterly Updates

Grant managers also use the GAT to perform desk reviews on their grants throughout the fiscal year. OJP policy states that a desk review for each open, active grant should be conducted approximately once every 6 months, but not less than once annually.

Throughout the fiscal year, grant managers conduct in-depth monitoring to collect pertinent administrative, financial, and programmatic information in order to assess grantee performance and compliance with programmatic and financial grant requirements. In-depth monitoring includes site visits, as well as a new type of monitoring introduced in FY 2011 called the Enhanced Programmatic Desk Review (EPDR), which is explained in more detail under the *Improvements and Planned Activities* section of this report. After conducting a site visit or an EPDR, grant managers are required to complete a report, which documents monitoring activities and conclusions. Grant managers are also required to complete a post-monitoring letter to the grantee, which outlines identified issues for resolution and recommendations as needed. If



issues for resolution are identified during the review, they must be recorded in the Grants Management System (GMS). Grant managers are then responsible for working with grantees to ensure that actions are taken to resolve the issues identified.

OJP site visit/EPDR documentation, including reports and post-monitoring letters, must be completed and approved in GMS by the grant manager's first-line supervisor within 45 days of the end of the site visit/EPDR. The 45-day process is an internal control to ensure that the grantee is being notified of any issues found during the review in a timely fashion. Not communicating to the grantee in a timely manner could allow for issues found to be perpetuated. OAAM reviews completed site visit/EPDR data reported by grant managers at the end of each quarter to track and report OJP's progress towards meeting its annual monitoring requirement.

At the end of each quarter, OJP program offices, the COPS Office, OVW, and OCFO provide OAAM with updates on their monitoring activities. Grant managers may make changes to the monitoring plan by rescheduling monitoring to different quarters, adding site visits/EPDRs to the plan, and removing previously planned monitoring, which has been canceled or rescheduled. OJP grant managers use the GAT to make their updates, while the COPS Office, OVW, and OCFO use tracking spreadsheets. OAAM validates these data and publishes a revised monitoring plan on the OJP Grant Makers portal site each quarter and distributes it to the COPS Office and OVW.



FY 2011 and FY 2012 Improvements and Planned Activities

Improved Monitoring Activities

In FY 2011, in an effort to continuously improve monitoring standards and procedures and to respond to issues identified throughout the year, OAAM completed a number of activities to improve compliance with the policies and procedures outlined in the Grant Manager's Manual (GMM), strengthen grantee oversight, and ensure that grantees are receiving consistent, quality feedback from grant managers.

In FY 2011, due to the full-year Continuing Resolution, there was a freeze on most travel including travel for monitoring, grantee training, conferences, and other programmatic travel. In order to fulfill OJP's statutory monitoring requirements and internal targets, as well as to continue to provide thorough and comprehensive monitoring and oversight, OJP had to revise its monitoring plan. OAAM and OCFO developed an alternative monitoring approach for the remainder of the year. "Monitoring Plan B" (or "Plan B"), as it is called, emphasized monitoring grantees with overall risk to OJP through a three-pronged approach, which included joint site visits, visits to local grantees, and remote monitoring.

First, it focused scarce travel funds on monitoring grantees who managed large numbers of OJP grants across several OJP program offices and who also posed a risk based on OCFO's 2011 risk assessment model. In all, four programmatic and financial joint site visits were completed utilizing two OCFO financial monitors and two programmatic monitors from selected OJP program offices. This approach allowed OJP to identify systemic problems with these grantees that would not have been uncovered had each of the grants been monitored individually. Second, grant managers placed greater emphasis on conducting site visits of grantees located in the local commuting area.

The third method of "Plan B" was the introduction of remote monitoring to OJP. OAAM worked with the Monitoring Working Group⁶ to develop an approach for grant managers to review grantees from their desks, but provide a level of thoroughness and detail beyond that of a standard desk review. This EPDR process allows grant managers to assess the programmatic integrity and accountability of their grants and grantees without going on-site. Grant managers are required to collect and retain

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



documentation to substantiate their findings, as would have been required during an on-site monitoring visit with the grantee. EPDR procedures require that an exit interview also be conducted in which findings and technical assistance needs are discussed, similar to what would occur in an on-site visit. When feasible, the use of videoconferencing is also encouraged. During the first half of FY 2012, OAAM refined the EPDR procedures and checklist to provide a better framework for documenting activities and information reviewed by grant managers remotely.

In an effort to ensure OJP was focusing monitoring efforts on OJP grantees with the greatest risk, OAAM, in coordination with OCFO and the Monitoring Working Group, developed an automated risk assessment tool which was implemented beginning in FY 2012. The automated risk assessment is conducted in the GAT and utilizes 27 risk criteria based on existing information about the financial, administrative, and programmatic performance of grantees to assign a risk score and a corresponding monitoring priority for each grant. The automated risk process feeds data directly from GMS and FMIS2 and calculates risk by scoring each risk criteria and multiplying that by its relative importance score. OJP grant managers no longer need to manually respond to the risk indicator questions during the annual monitoring plan development process, which has increased the accuracy and consistency of the results while significantly reducing program office time and labor costs in FY 2012.

In addition, OAAM, along with the Monitoring Working Group, revised the OJP Site Visit Checklist in order to provide an enhanced framework for documenting activities and information reviewed by grant managers while on-site.

During FY 2012, OAAM is assessing the use and validity of the automated risk assessment in determining whether in-depth monitoring should be conducted for particular grants. This is enabling OAAM to better define these designations for the FY 2013 risk assessment process, leading to a more targeted monitoring plan. In addition, OAAM is conducting quarterly risk assessment activities on grantees that have been designated as DOJ high-risk grantees.

In FY 2012, OAAM began piloting the Site Visit/EPDR Quality Review Process which is being used to assess the adequacy and quality of OJP's in-depth monitoring activities. The quality review process involves a thorough assessment of the entire site visit/EPDR package, including the completeness of required elements, the adequacy of the analysis presented in the site visit/EPDR report, and the evaluation of supporting documents. When the quality review process is finalized, OAAM will require grant managers and program offices to remedy any issues identified and make improvements as necessary.

To improve the grant monitoring process and increase compliance with OJP monitoring policies, OAAM is conducting training, as requested by program offices on specific aspects of monitoring activities. Areas for training include documentation and use of



the revised OJP site visit checklist and EPDR checklist; entering, tracking, and closing issues for resolution in GMS; and conducting financial monitoring activities. OAAM will continue to provide program offices with quarterly updates on monitoring progress, as well as information, as requested, on risk 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 2012, OJP leadership identified two monitoring priorities in the FY 2012 Monitoring Guidelines that OJP is focusing on this fiscal year.

Conference Cost Oversight

OJP is currently implementing several procedures designed to minimize conference costs and enhance its monitoring and oversight of grantees who conduct conferences, trainings, and meetings. While OJP has been able to immediately identify and examine these events within each of its contracts and cooperative agreements, its greater task is to ensure that conference activities that are part of OJP's active grant portfolio are also compliant with relevant DOJ policies. During the development of the annual monitoring plans and throughout the course of FY 2012, program offices and OCFO identified grants that may contain conference-related activities and gave them additional consideration as to whether they were in need of more in-depth monitoring.

In-Depth Monitoring Activities

On October 5, 2011, the Department issued a memorandum continuing the FY 2011 restrictions on non-essential spending for FY 2012. This, includes suspending all non-essential travel, training, and conferences. As a result of tightened budgets, OJP will continue the strategies implemented in FY 2011, including multi-office on-site visits, the use of EPDRs and videoconferencing, and on-site monitoring of grantees found to be most in need of intensive oversight. These activities are all part of OJP's in-depth monitoring plan to ensure that sound grant management continues and the collective statutory monitoring requirements and internal targets are met.

To ensure that OJP is maximizing its limited travel funds, program offices and OCFO must use a data- and risk-based approach to select grantees requiring an on-site visit. With the FY 2012 GAT automation, OJP is able, using such an approach, to determine which grants and grantees pose the greatest risk to OJP. Beginning in FY 2012, each program office will work to ensure that all grants identified as a high monitoring priority receive at least one on-site visit over the course of the grant period. Program offices should ensure that each grant identified as high priority, but not selected for in-depth monitoring in FY 2012, has been given proper consideration and that the



justification for not monitoring during this fiscal year is adequately documented in the GAT.



FY 2011 OJP and the COPS Office Overall Monitoring Statistics

In FY 2011, OJP program offices completed in-depth monitoring activities (site visits and EPDRs) for 1,121 grants, and the COPS Office completed on-site monitoring for 230 grants. OJP and the COPS Office exceeded the statutory requirement to monitor 10 percent of total award funding each year; OJP program offices monitored 25 percent (\$2.24 billion) and the COPS Office monitored 11 percent (\$267.92 million) of their open, active award amounts. In addition, OCFO conducted on-site financial monitoring for 471 grants totaling \$2.91 billion.⁷ Table 1 displays the completed types of monitoring by OJP program offices, the COPS Office, and OCFO in terms of award amounts and number of grants monitored throughout the fiscal year. Of the 471 grants which were financially monitored by OCFO, 210 were also programmatically monitored by OJP program offices, and three were programmatically monitored by the COPS Office. In total, 1,609 grants received programmatic and/or financial monitoring during FY 2011.

Table 1. FY 2011 Summary of completed monitoring for OJP, the COPS Office, and OCFO

Office	Award amount monitored (in millions)	Number of grants monitored
OJP	\$2,237.42	1,121
COPS	\$267.92	230
Total programmatic	\$2,505.34	1,351
OCFO*	\$2,911.14	471
Total programmatic and financial**	\$3,297.78	1,609

*OCFO monitoring total includes OJP, COPS Office, and OVW awards.

**The total programmatic and financial monitoring numbers are less than the sum of OJP, COPS, and OCFO monitoring because of overlap between completed programmatic and financial monitoring.

FY 2010 and FY 2011 Completed Programmatic Monitoring

In FY 2011, OJP program offices monitored more than twice the award amount statutorily required. This represented a decrease of 27 percent (\$812.19 million) from its FY 2010 totals. However, as previously discussed, OJP had to revise its FY 2011

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.



monitoring plan to address financial constraints placed on travel funds. The development of the new remote monitoring procedures, as well as the training of staff, took up much of the third quarter, reducing the amount of time available to grant managers to conduct monitoring activities. However, even with the travel constraints and reduced time, OJP was able to programmatically monitor \$2.24 billion in award funds covering 1,121 grants. From FY 2010 to FY 2011, the number of open, active OJP grants increased by 9 percent, from 12,394 to 13,504; and the open, active award amount increased by 6 percent, from \$8.38 billion to \$8.88 billion. The COPS Office increased its number of awards and award amount monitored in FY 2011; however, due to a 20 percent increase in the number of open, active grants, the COPS Office monitored the same percentage of its funds (11%) and total awards (5%) as in 2010. Tables 2 and 3 compare these award amounts and number of grants monitored, respectively, by OJP and the COPS Office, between fiscal years.

Table 2. Comparison of FYs 2010 and 2011 completed programmatic monitoring for OJP and the COPS Office, by award amount (in millions)

Office	FY 2010			FY 2011		
	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	\$8,379.63	\$3,049.61	36%	\$8,875.47	\$2,237.42	25%
COPS	\$2,224.37	\$234.74	11%	\$2,523.37	\$267.92	11%

Table 3. Comparison of FYs 2010 and 2011 completed programmatic monitoring for OJP and the COPS Office, by number of grants

Office	FY 2010			FY 2011		
	Total open, active grants	Number of grants monitored	Percent of total	Total open, active grants	Number of grants monitored	Percent of total
OJP	12,394	1,447	12%	13,504	1,121	8%
COPS	3,776	185	5%	4,517	230	5%



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

In FY 2011, there was an increased emphasis on planning and coordination across OJP and among the DOJ grant-making components to conduct joint site visits when it was determined that monitoring efforts would be maximized and the burden to the grantee would be minimized. OJP’s annual programmatic monitoring plans were completed 2 months earlier than in previous years to coincide with the development of the financial monitoring plan and provide more time for the coordination of site visits prior to the start of the new fiscal year. In FY 2011, OJP and OCFO conducted joint programmatic and financial monitoring site visits to 18 grantees, covering 164 grants and totaling \$411.90 million. Four of these visits, covering 138 grants and \$33.35 million were multi-office site visits conducted to state administering agencies as part of “Monitoring Plan B.” In FY 2010, OJP and OCFO conducted 19 joint site visits, covering 40 grants and \$281.97 million. FY 2011 represents a significant change in the approach and planning of joint monitoring due to “Monitoring Plan B.” The FY 2011 multi-office visits were selected on the grantee level, rather than the grant level, thus focusing on monitoring grantees which represent a greater risk to OJP due to a larger number of total awards and higher levels of funding. This approach allowed OJP and OCFO to maximize their resources and monitor more awards and award dollars with fewer site visits. Table 4 below details the joint monitoring completed by OJP and OCFO in FY 2010 and FY 2011. The COPS Office did not perform any joint site visits with OCFO in FY 2011 or FY 2010.

Table 4. FY 2011 and FY 2010 joint monitoring by OJP and OCFO

Fiscal year	Number of grantees monitored	Number of grants monitored	Award amount monitored (in millions)
2010	19	40	\$281.97
2011	18	164	\$411.90

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

As of October 1, 2010, OJP had 3,613 open, active Recovery Act awards totaling \$2.67 billion, and the COPS Office had 1,039 totaling \$999.33 million. Table 5 details the award amounts and number of Recovery Act grants monitored by OJP program offices, the COPS Office, and OCFO in FY 2011. During FY 2011, OJP programmatically monitored 7 percent of open, active Recovery Act grants and 36 percent of open, active Recovery Act funds. The COPS Office monitored 62 Recovery Act grants totaling \$124.23 million. In FY 2011, OCFO conducted financial monitoring for 89 Recovery Act awards totaling \$785.31 million.



Table 5. FY 2011 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 grants	Number of grants monitored
OJP	\$2,667.97	\$958.38	3,613	270
COPS	\$999.33	\$124.23	1,039	62
OCFO*		\$785.31		89

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

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. (This designation is not related to the high priority designation assigned grants for purposes of monitoring.) OAAM's Audit and Review Division manages DOJ's high risk program on behalf of the OJP, the COPS Office, and OVW. This entails coordinating the high-risk grantee list and working to either resolve the issues underlying the high-risk designation or impose conditions on high risk grantees to ensure appropriate stewardship of federal funds and enhance programmatic results.

As shown in Table 6, OJP and the COPS Office had 68 grantees with 284 grants totaling \$335.04 million on the DOJ high-risk list at the beginning of FY 2011. There were several grantees that had awards in multiple program offices and thus had the potential to be monitored by more than one program office throughout the year. As a result, some grantees were included in the figures for more than one office. However, these grantees were only counted once in the total number of grantees on the DOJ high-risk list and the total number of high risk grantees monitored by OJP and the COPS Office.

By the end of the fiscal year, OJP and the COPS Office had conducted in-depth programmatic monitoring for 18 of these grantees, with 64 grants totaling \$118.32 million, or 35 percent of the total award amount. BJA had active grants with 45 grantees on the DOJ high-risk list, of which it monitored 13. CCDO, OVC, and the SMART Office did not monitor any high risk grantees during FY 2011. The COPS Office had 28 grantees on the high-risk list, of which it monitored 2.



Table 6. FY 2011 OJP and the COPS Office total and programmatically monitored grantees and grants on the DOJ 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	\$153.96	\$91.77	60%	45	13	106	28
BJS	\$49.15	\$4.78	10%	5	2	13	4
CCDO	\$0.30	\$0.00	0%	1	0	2	0
NIJ	\$12.81	\$2.14	17%	10	2	27	6
OJJDP	\$47.79	\$16.11	34%	16	6	57	21
OVC	\$17.21	\$0.00	0%	6	0	14	0
SMART	\$1.20	\$0.00	0%	6	0	8	0
COPS	\$52.62	\$3.52	7%	28	2	57	5
Total	\$335.04	\$118.32	35%	68	18	284	64

*High risk grantees may have grants with multiple program offices.



FY 2011 OJP Monitoring Statistics

At the beginning of FY 2011, OJP had 13,504 open, active grants totaling \$8.87 billion.⁸ Based on the 10 percent statutory requirement, the award amount required for monitoring was \$887.55 million. In addition, the OJP policy requirement that program offices conduct in-depth monitoring for at least 10 percent of the number of open, active grants (5 percent for BJA) resulted in a total monitoring requirement of 878 grants. In FY 2011, OJP program offices completed in-depth monitoring activities for 1,121 grants totaling \$2.24 billion, exceeding the statutory requirement by 25 percent. In addition, OCFO monitored 380 OJP grants, totaling \$1.25 billion (table 7). Of these grants, 210, totaling \$662.29 million were also monitored programmatically by OJP program offices. In total, OJP conducted programmatic and/or financial monitoring of 1,291 grants, totaling \$2,825.09 million.

Table 7. FY 2011 Summary of completed monitoring for OJP

Office	Award amount monitored (in millions)	Number of grants monitored
Programmatically monitored by OJP program offices	\$2,237.42	1,121
Financially monitored by OCFO	\$1,249.96	380
Programmatically and financially monitored by OJP program offices and OCFO	\$662.29	210
Total programmatic and financial*	\$2,825.09	1,291

*The total monitoring numbers for OJP are less than the sum of OJP and OCFO monitoring because of overlap within the two offices' completed monitoring.

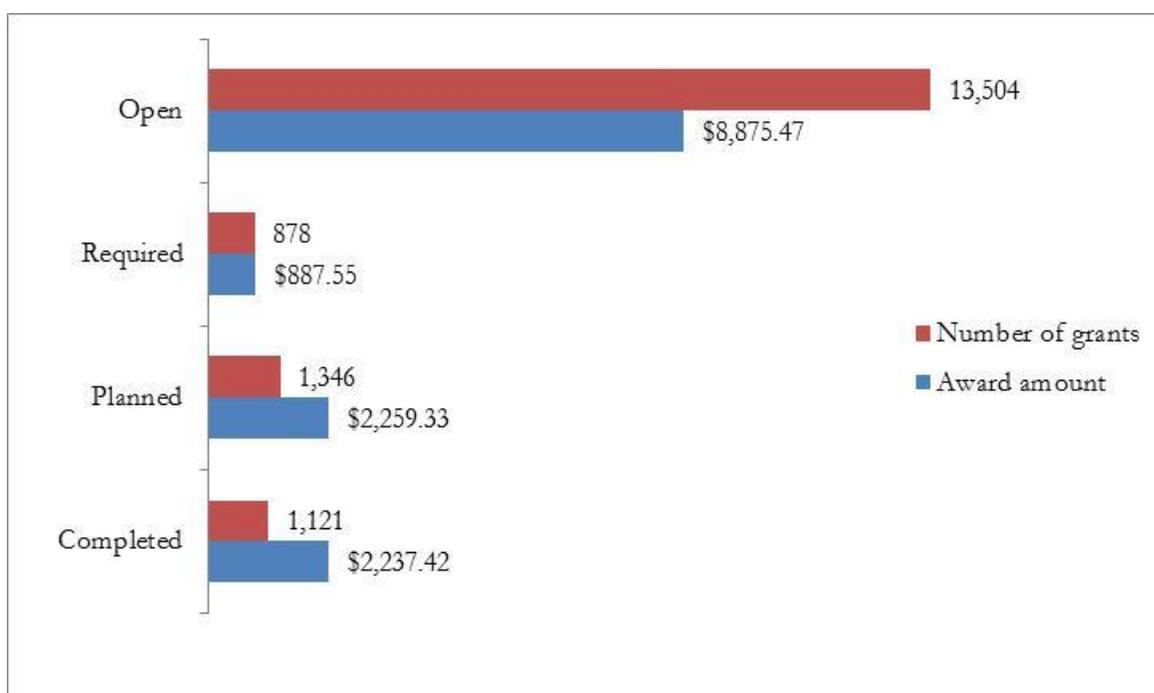
⁸ At the beginning of FY 2011, OJP also had 407 grants totaling \$210,194,305 that were awarded and not yet accepted, and 85 grants totaling \$15,602,263 that were awarded and accepted but not yet open and active.



Required, Planned, and Completed Programmatic Monitoring

By the end of FY 2011, OJP program offices completed 506 site visits/EPDRs, monitoring 1,121 grants totaling \$2.24 billion. The completed award amount monitored exceeded the required level by \$1.35 billion, but was 1 percent (\$21.91 million) less than originally planned. The number of grants monitored exceeded the required number by 243 and, similarly to award amount, was 225 grants less than originally planned. Figure 1 illustrates the award amount and number of grants required, planned, and completed to reach OJP’s monitoring thresholds for FY 2011.

Figure 1. FY 2011 OJP open, required, planned, and completed programmatic in-depth monitoring, by number of grants and award amount (in millions)



A comparison of planned and completed monitoring from FY 2008 to FY 2011 is shown in Figure 2. In FY 2011, OJP planned to monitor \$2.26 billion and completed in-depth monitoring of \$2.24 billion, or 99 percent of the amount which was originally planned. This is an improvement from FY 2010, when 89 percent of planned monitoring was completed and a significant improvement from FY 2009, when only 52 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 select, particularly for those identified as high or medium monitoring priority or those on the DOJ High Risk List. For these grants, grant managers are required to document why in-depth monitoring was not completed as originally planned. 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, 2010, and 2011 OJP planned and completed programmatic in-depth monitoring, by award amount (in millions)

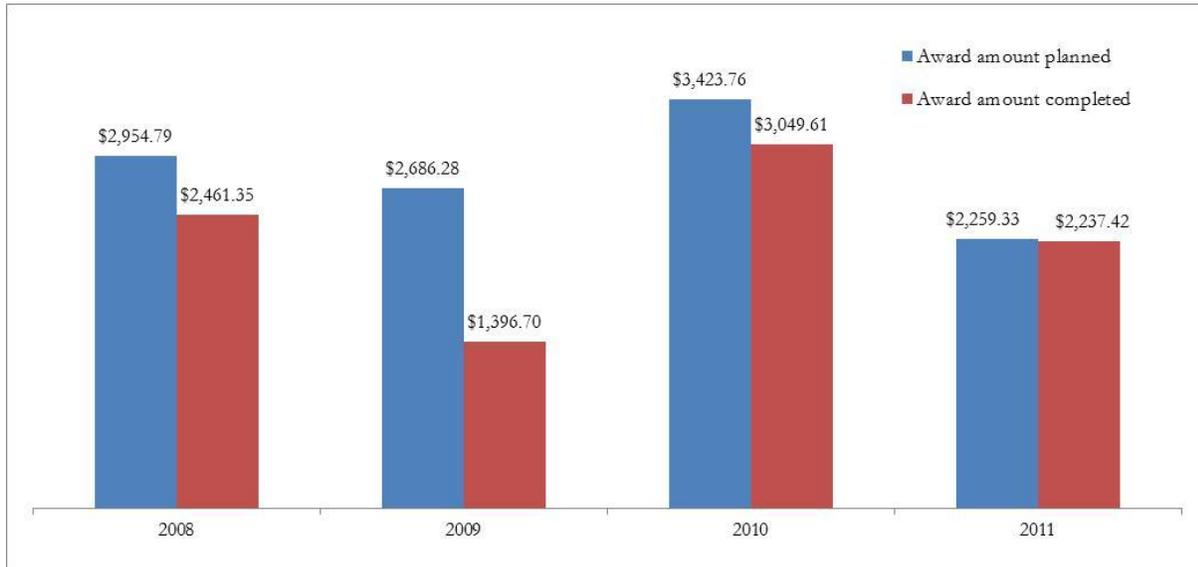


Table 8 presents the amount of open, active awards, required statutory monitoring thresholds, and completed monitoring for each program office. Each program office within OJP individually exceeded this requirement to monitor 10 percent of total funding by the end of FY 2011.

Table 8. FY 2011 OJP open, required, and completed programmatic in-depth monitoring, by award amount (in millions)

Program office	Total amount of open, active awards	Required monitoring	Completed monitoring	Award amount exceeding required monitoring
BJA	\$5,040.20	\$504.02	\$1,343.70	\$839.68
BJS	\$159.91	\$15.99	\$37.27	\$21.28
CCDO	\$32.53	\$3.25	\$4.44	\$1.18
NIJ	\$589.99	\$59.00	\$111.30	\$52.30
OJJDP	\$1,229.81	\$122.98	\$360.81	\$237.83
OVC	\$1,782.00	\$178.20	\$364.80	\$186.60
SMART	\$41.03	\$4.10	\$15.11	\$11.00
Total	\$8,875.47	\$887.55	\$2,237.42	\$1,349.87



Table 9 also presents a breakdown of each program office’s number of open, active grants, required OJP monitoring thresholds, and completed monitoring. Each program office either met or exceeded OJP’s requirement to monitor 10 percent (5 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 243 grants.

Table 9. FY 2011 OJP open, required, and completed programmatic in-depth monitoring, by number of grants

Program office	Number of open, active grants	Required monitoring*	Completed monitoring	Award amount exceeding required monitoring
BJA	9,441	472	563	91
BJS	227	23	23	0
CCDO	194	19	20	1
NIJ	1,008	101	107	6
OJJDP	1,939	194	334	140
OVC	564	56	59	3
SMART	131	13	15	2
Total	13,504	878	1,121	243

*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 5 percent.

FY 2011 “Monitoring Plan B”

As a result of the FY 2011 Continuing Resolution, OJP had a significant reduction in its Salaries and Expenses (S&E). In order to reduce spending from the S&E account, in April 2011 OJP froze most travel, including travel for monitoring, grantee training, programmatic conferences, and other programmatic travel.

In order to fulfill OJP’s statutory monitoring requirements and internal targets, as well as continue to provide thorough and comprehensive monitoring and oversight, OJP developed an alternative monitoring approach for the remainder of the year. Referred to as “Monitoring Plan B,” this three-pronged approach includes the following activities: four joint site visits (programmatic and financial) to State Administering Agencies (SAAs); local site visits to Maryland, Virginia, and District of Columbia grantees; and remote monitoring, involving EPDRs.

Table 10 details OJP’s FY 2011 monitoring according to the type of monitoring provided. Because this shift in policy did not occur until April 2011, OJP was still able



to monitor 616 grants on-site as originally planned. In addition, OJP monitored 505 grants through “Plan B” measures.

Table 10. FY 2011 OJP completed programmatic in-depth monitoring, by type (in millions)

Type of monitoring	Number of grants monitored	Award amount monitored
On-site monitoring	616	\$1,362.31
Multi-office site visits*	148	\$339.37
Local monitoring	52	\$89.02
Enhanced Programmatic Desk Reviews (EPDRs)	305	\$446.71
Total	1,121	\$2,237.42

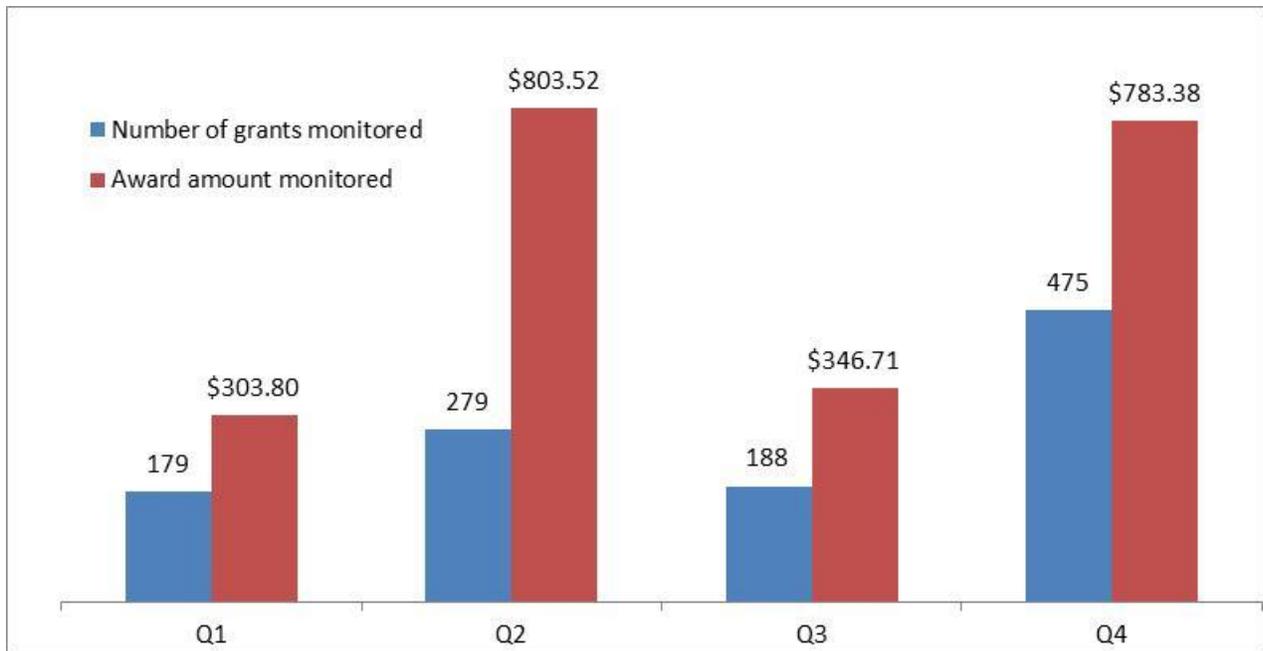
*Grants monitored during the multi-office site visits were reviewed by both an OJP program manager and an OCFO financial analyst.

Quarterly Monitoring Completed

Figure 3 shows the number and dollar amount of awards monitored by OJP in each quarter of FY 2011. The smallest proportion of monitoring was completed in the first quarter, while the largest proportion was completed in the fourth. The number and amount of awards monitored dropped significantly in the third quarter, most likely as a result of the FY 2011 Continuing Resolution, which forced OJP to revise its monitoring plan for the year. OJP was able to raise its monitoring levels in the fourth quarter after the “Monitoring Plan B” approach was developed and implemented.

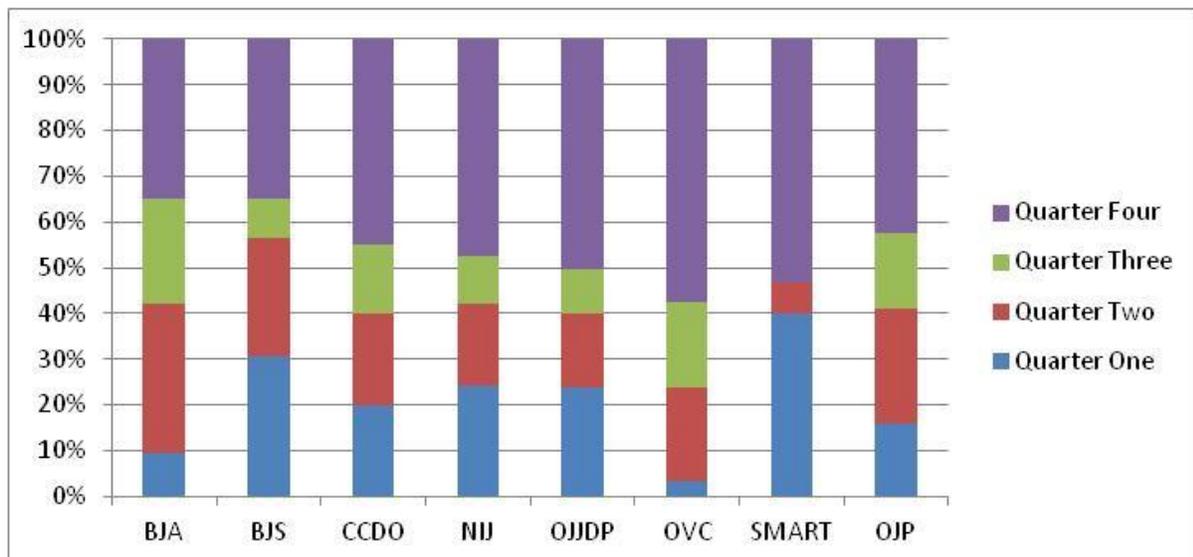


Figure 3. FY 2011 OJP award amount (in millions) and number of grants programmatically monitored, by quarter



The trends illustrated in Figure 3 were consistent across OJP’s program offices, as presented in figure 4 with individual program office monitoring for each quarter. Each program office conducted at least 30 percent of its monitoring in the fourth quarter, and across OJP as a whole, monitoring decreased sharply in the third quarter.

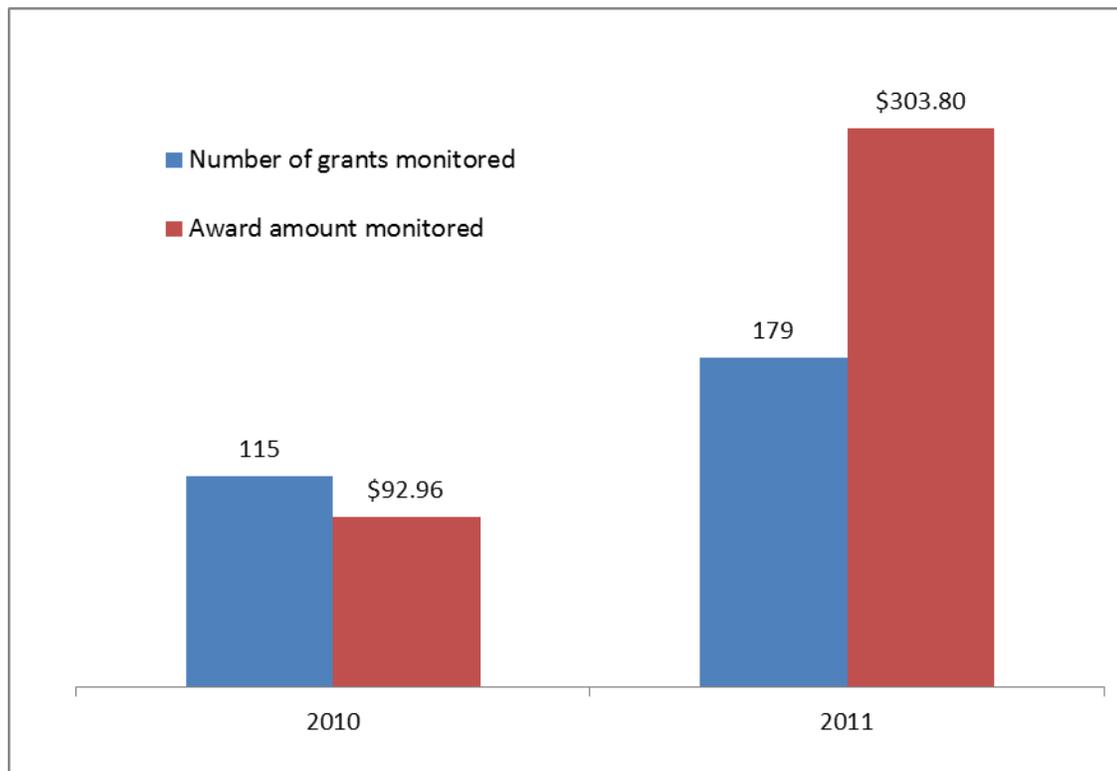
Figure 4. FY 2011 Percent of total number of grants programmatically monitored each quarter, by program office





In FY 2011, the timeline for the development of the monitoring plan was moved up, in part to allow program offices to complete more of their monitoring during the first quarter of the fiscal year. As a result, the number of grants monitored in Q1 increased from 115, totaling \$92.96 million in FY 2010, to 179 grants, totaling \$303.80 million in FY 2011. In FY 2010, Q1 monitoring accounted for 8% of all grants monitored and 3% of all grant funds monitored. In FY 2011, these numbers increased to 16% of all grants monitored and 14% of all grant funds monitored. This trend is illustrated in Figure 5.

Figure 5. Number of grants and award amount (in millions) programmatically monitored in Q1 of FY 2010 and FY 2011



Monitoring Priority

When conducting assessments in the GAT for the FY 2011 monitoring plan development, grant managers assessed their open, active awards against a set of risk indicators, and based on their responses, the GAT assigned a priority score and an associated monitoring priority of high, medium, or low. Grant managers used the monitoring priority as a guideline, in addition to professional discretion, which includes their in-depth knowledge of the grantee as well as programmatic performance, when deciding which of their grants to monitor. In FY 2011, OJP program offices assessed 7,350 grants, which resulted in a high monitoring priority rating for 582 (8%) grants, a medium priority rating for 1,342 (18%) grants, and a low priority rating for



5,426 (74%) grants. There were an additional 234 grants monitored in FY 2011 that were not assigned a monitoring priority during the initial assessment period.

Table 11 summarizes planned and completed monitoring within each monitoring priority. Of the 582 grants identified as a high monitoring priority, 266 (46%) were planned for monitoring and 142 (24%) were ultimately monitored in FY 2011. This suggests that grant managers were using the GAT priority scores when planning their monitoring selections and giving particular attention to high priority grants.

Table 11. FY 2011 OJP number of grants assessed, planned for programmatic in-depth monitoring, and completed, by monitoring priority

Monitoring priority	Number of grants assessed	Number of grants planned for monitoring	Percent of grants planned for monitoring	Number of grants completed*	Percent of grants completed based on number of grants assessed
High	582	266	46%	142	24%
Medium	1,342	415	31%	232	17%
Low	5,426	901	17%	517	10%

*There were an additional 234 grants monitored that were not assessed at the beginning of the fiscal year and, thus, not included in this table.

In FY 2011, 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 12 shows that, by far, the most common comment was “Per program office policy or rotation.” Based on findings from a review of justification’s used in FY 2010, beginning in FY 2011, when choosing this comment, grant managers were required to describe in detail the program office policy or rotation. During FY 2012, OAAM will provide training to grant managers on using more definitive statements when documenting why medium and high priority-designated grants are not being monitored.



Table 12. FY 2011 Justification provided by grant managers when choosing not to programmatically monitor high and medium priority grants

Program office	Total	About to expire/closeout	Location	New grant; Too early to be visited	Per program office policy or rotation	Visited less than two years ago
BJA	965	67	110	100	546	142
BJS	30	6	2	1	13	8
CCDO	22	3	0	0	7	12
NIJ	116	24	0	1	55	36
OJJDP	189	32	6	8	49	94
OVC	48	10	0	3	24	11
SMART	2	0	0	0	2	0
Total	1,372	142	118	113	696	303

Site Visit/EPDR Report Delinquencies

OJP policy states that grant managers submit and first-line supervisors (FLS) approve in the GMS Monitoring Module a site visit/EPDR package, which consists of a site visit/EPDR report and a post-site visit/EPDR letter, within 45 calendar days of the site visit/EPDR 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 the site visit/EPDR. Grant managers are required to submit their reports within 45 days, as grantees do not receive official notification of the results of the site visit/EPDR until the report is approved in GMS. This means that issues identified during in-depth monitoring can remain unknown and uncorrected until the report is approved and the site visit/EPDR letter is posted to the grantee.

Table 13 displays the disposition of site visit/EPDR reports. In FY 2011, 48 percent of all site visit/EPDR reports were approved after the 45-day timeframe and considered delinquent, with OJJDP (63%) and BJA (51%) having the highest percentage of late reports. Every office finalized and approved at least 20 percent of its site visit/EPDR reports after the 45-day period. Of the 244 delinquent site visit/EPDR packages, 70 percent were submitted by the grant manager to the first-line supervisor after the 45-day time frame. The other 73 site visit/EPDR reports were submitted to the first line supervisor within 45 days of the site visit end date, but were approved after the 45 day mark, making them delinquent as well. Note: There was a technical problem with GMS from January-July 2012 that required a work around by users. All but one user was able to successfully apply the work around. In addition, of the 32 multi-office reports submitted under "Monitoring Plan B," 15 (47%) were marked as delinquent. OAMM



anticipated this delinquency due to the additional requirements to combine multiple site visit reports into one single report and for multi-office reviews.

It should also be noted that 18 EPDRs were incorrectly entered into GMS as “other” instead of “full monitoring.” Due to this error, these EPDRs did not follow the same workflow as full monitoring site visits/EPDRs in GMS. Therefore, we were unable to track if these packages were submitted and approved prior to becoming delinquent. These 18 EPDRs are not included in tables 13 and 14.

Table 13. FY 2011 OJP number of delinquent site visit/EPDR reports, by program office

Program office	Total number of completed site visit/EPDR reports	Number of delinquent site visit/EPDR reports	Percent of delinquent site visit/EPDR reports	Number of reports with grant manager >45 Days	Number of reports submitted to FLS but not approved within 45 days
BJA	286	146	51%	95	51
BJS	13	3	23%	3	0
CCDO	14	9	64%	8	1
NIJ	75	25	33%	20	5
OJJDP	84	53	63%	38	15
OVC	25	6	24%	5	1
SMART	9	2	22%	2	0
Total	506	244	48%	171	73

*First Line Supervisor (FLS)

Table 14 displays the number of days delinquent site visit/EPDR reports were submitted after the 45-day deadline. Of the 244 delinquent reports, 109 reports (45%) were submitted within 2 weeks after the 45-day deadline. All reports except one OJJDP report were submitted within six months of the 45-day deadline.

Table 14. FY 2011 Range of submission (measured from 45-day timeframe) for delinquent site visit reports, by program office

Program office	Total delinquent reports	Less than 2 weeks	2 weeks-1 month	1-3 months	3-6 months	More than 6 months
BJA	146	64	49	33	0	0
BJS	3	3	0	0	0	0



Program office	Total delinquent reports	Less than 2 weeks	2 weeks- 1 month	1-3 months	3-6 months	More than 6 months
CCDO	9	4	5	0	0	0
NIJ	25	18	1	5	1	0
OJJDP	53	15	4	29	4	1
OVC	6	4	0	1	1	0
SMART	2	1	1	0	0	0
Total	244	109	60	68	6	1

Issues for Resolution

After in-depth programmatic monitoring is conducted, grant managers must record issues for resolution, defined as any issues requiring corrective action on the part of the grantee, in GMS. These issues are tracked in GMS until they are resolved. Table 15 shows the amount of grants with issues for resolution (each grant can have multiple) and their respective program offices. Grant managers recorded issues for resolution for eight percent of the total number of grants monitored. BJS and CCDO did not record any issues for resolution for their monitored grants. 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.

Table 15. FY 2011 OJP grants with issues for resolution, by program office

Program office	Total number of grants monitored	Total number of issues	Number of grants with issues for resolution	Percent of grants with issues
BJA	563	106	36	6%
BJS	23	0	0	0%
CCDO	20	0	0	0%
NIJ	107	48	18	17%
OJJDP	334	123	30	9%
OVC	59	12	8	14%
SMART	15	6	1	7%
Total	1,121	295	93	8%

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 address grantees' compliance with grant terms and conditions, and reporting requirements. This includes ensuring compliance with statutory regulations and ascertaining that GMS and the grant manager's working files have complete documentation. Programmatic review consists of grant managers reviewing how grantees are implementing program objectives. Table 16 categorizes issues for resolution identified in FY 2011 under these three types of reviews. Programmatic issues accounted for 43% of all identified issues for resolution, administrative issues 22%, and financial 36%.

Table 16. FY 2011 OJP grants with issues for resolution, by type of issue and program office

Program office	Total number of issues	Number of financial issues	Number of administrative issues	Number of programmatic issues
BJA	106	53	31	22
BJS	0	0	0	0
CCDO	0	0	0	0
NIJ	48	10	25	13
OJJDP	123	40	1	82
OVC	12	1	6	5
SMART	6	1	1	4
Total	295	105	64	126

During FY 2011, OAAM initiated a review of issues for resolution to better understand how they were used by grant managers. OAAM determined that this activity is not consistently performed by grant managers. Of the 120 grant managers who completed in-depth monitoring activities in 2011, only 21 (17%) reported issues for resolution in GMS. Among these 21 grant managers, all but two identified multiple issues for resolution. OAAM will continue to review how grant managers are identifying and recording issues for resolution throughout FY 2012.

OCFO Financial Monitoring Results

During FY 2011, the GFMD conducted on-site reviews of 471 grants. No significant weaknesses were identified for 44 of the grants reviewed (8.6%). However, for the remaining 427 grants reviewed (91.4%), at least one reportable finding was issued. The top 10 findings noted include:

1. Expenditures were questioned for 143 grants (28%)
2. Budget category expenditures were not properly tracked for 88 grants (18%)



3. Subgrantee monitoring procedures not documented or needed improvement for 72 grants (14%)
4. Program/Interest income and related expenditures not accurately reported on SF 425s for 59 grants (12%)
5. Payroll Procedures not documented or needed improvement for 53 grants (10%)
6. Budget modification exceeds 10% limit or results in potential scope change for 48 grants (9%)
7. Consultant service charges exceed rate limit (i.e., daily threshold) for 46 grants (8.9%)
8. Award Special Condition not met by grantee for 46 grants (8.9%)
9. Subgrantee monitoring not being conducted for 45 grants (8.8%)
10. Accounting Procedures not documented or needed improvement for 44 grants (8.5%)

Recovery Act Monitoring Statistics

As of October 1, 2010, OJP had 3,613 open, active Recovery Act grants and had allocated a total of \$2.79 billion over the lifetime of the Recovery Act, with \$2.66 billion still open and active. 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 10 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 5 percent of the number of grants must be monitored.

Table 17 accounts OJP's open and active Recovery Act awards and respective monitoring, as of the beginning of FY 2011. As of the end of FY 2011, all program offices have met the Recovery Act monitoring requirement to monitor 30 percent of the lifetime award amount of Recovery Act grants. The SMART Office does not have any Recovery Act awards and, therefore, is not reported in the table.

Table 17. FY 2011 OJP Recovery Act total allocation, required, and completed programmatic monitoring, by award amount (in millions)

Program office	Number of open, active Recovery Act awards as of 10/1/2011	Open, active Recovery Act award amount as of 10/1/2010	Number of Recovery Act awards monitored in FY 2011	Recovery Act award amount monitored in FY 2011
BJA	3,381	\$2,462.02	223	\$908.91
BJS	1	\$1.00	0	\$0



Program office	Number of open, active Recovery Act awards as of 10/1/2011	Open, active Recovery Act award amount as of 10/1/2010	Number of Recovery Act awards monitored in FY 2011	Recovery Act award amount monitored in FY 2011
CCDO	2	\$1.83	1	\$1.61
NIJ	22	\$11.19	11	\$5.94
OJJDP	96	\$101.57	23	\$31.74
OVC	111	\$90.37	12	\$10.17
Total	3,613	\$2,667.97	270	\$958.38

OJP policy states that if all Recovery Act awards funded under a program were monitored in the previous year and no issues for resolution were found, the program offices are not required to include those awards as part of their monitoring plan for the current fiscal year. As of October 1, 2010, BJS had one open, active Recovery Act grant totaling \$1 million. This grant was monitored in FY 2010 and no issues for resolution were found; therefore, BJS was not required to conduct in-depth monitoring of the grant in FY 2011 unless issues were detected through a desk review.

Table 18 details the monitoring thresholds for grants under the Recovery Act solicitation and their respective program offices. In FY 2011, OJP program offices monitored 270 Recovery Act grants, and all OJP program offices met or exceeded their monitoring requirements.

Table 18. FY 2011 OJP Recovery Act grants monitored, by program office and solicitation

Program office and solicitation	Open, active grants	Required*	Planned	Grants monitored
BJA	3,381	190	255	223
Edward Byrne Memorial Competitive Grant Program	105	11	13	16
Combating Criminal Narcotics Activity Stemming from the US Southern Border	20	2	2	2
Edward Byrne Memorial Justice Assistance Grant Program Local Solicitation	2,965	148	178	152
Rural Law Enforcement Assistance: Combating Rural	214	21	23	23



Program office and solicitation	Open, active grants	Required*	Planned	Grants monitored
Crime				
Edward Byrne Memorial Justice Assistance Grant Program State Solicitation	56	6	33	24
Correctional Facilities on Tribal Lands Program	21	2	6	6
BJS	1	1	0	0
Tribal Crime Data Collection, Analysis, and Estimation Project	1	0	0	0
CCDO	2	1	1	1
Recovery Act/Technical Assistance	2	1	1	1
NIJ	22	4	13	11
Evaluation of Internet Child Safety Materials Used by ICAC Task Forces in School & Community Settings	1	1	1	0
Research and Evaluation of Recovery Act State and Local Law Enforcement Assistance	2	1	2	2
Office of Science and Technology Law Enforcement Technology Research and Development	19	2	10	9
OJJDP	96	12	30	23
Internet Crimes Against Children Research Grants	3	1	1	1
Internet Crimes Against Children Task Force Program Grants	59	6	15	11
Internet Crimes Against Children Task Force Training and Technical Assistance Grants	6	1	2	1
Local Youth Mentoring Initiative	25	3	10	9
National Youth Mentoring Initiative	3	1	1	1
Recovery Act National Internet Crimes Against Children Data System (NIDS)	0	0	1	0



Program office and solicitation	Open, active grants	Required*	Planned	Grants monitored
OVC	111	11	12	12
Edward Byrne Memorial Competitive Grant Program	12	1	2	1
National Field Generated Training, Technical Assistance, and Demonstration Projects	13	1	1	1
Victims of Crime Act Victim Assistance Formula Grant Program	56	6	6	7
Victims of Crime Act Victim Compensation Formula Grant Program	30	3	3	3
Total	3,613	220	311	270

*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 5 percent.

Desk Reviews

Each year, grant managers must complete a desk review for all open, active grants. In FY 2011, grant managers conducted desk reviews on 15,667 grants. Of these, 7,350 grants were desk reviewed during the initial assessment period, and 8,317 grants received desk reviews over the course of the fiscal year. Table 19 below shows the number of desk reviews performed by each office by quarter, as well as the number of open grants at the conclusion of the fiscal year which had not received a desk review.

Table 19. FY 2011 Complete and incomplete desk reviews by program office and by quarter

Program office	Initial assessment period	Q1	Q2	Q3	Q4	Total	Not completed
BJA	4,129	3,304	3,265	0	185	10,883	0
BJS	136	0	5	20	65	226	0
CCDO	141	90	53	0	0	284	0
NIJ	691	12	108	115	283	1,209	2
OJJDP	1,561	18	42	124	475	2,220	44
OVC	634	0	23	27	12	696	4
SMART	58	1	4	86	0	149	0
Total	7,350	3,425	3,500	372	1,020	15,667	50



Conclusions

OJP and the COPS Office exceeded statutory monitoring requirements for the fifth year in a row. In total, during FY 2011, 1,609 OJP and COPS Office grants totaling \$3.3 million, received programmatic and/or financial monitoring during FY 2011. At the same time, OJP has put into action a hard line approach to the monitoring and oversight of its grantees, implementing agency-wide standard policies, procedures, and internal controls. Among the highlights of improvements during FY 2011, was the development and implementation of Monitoring Plan B, which significantly reduced travel costs in response to an OJP-wide freeze on travel, while enabling OJP to meet its statutory requirements for monitoring. OAAM also continued to improve the quality and completeness of OJP grant monitoring through the enhancement of tools such as the FY 2012 OJP Site Visit Checklist, EPDR checklist, and a redesigned Grant Assessment Tool (GAT). Last, OAAM revised the site visit quality review process, which is being piloted in FY 2012 to assess areas for improvement in site visit documentation and report quality.

Looking forward, OAAM identified several opportunities to further improve grant monitoring activities. In FY 2012, OAAM is undertaking the following activities; assessing the use and validity of the automated risk assessment process, conducting quarterly risk assessment activities on grantees that have been designated as DOJ high-risk grantees, and piloting the site visit quality review process. OAAM continues to provide OJP program offices with the results of quarterly monitoring performance metrics and holds periodic Monitoring Working Group meetings to continually solicit feedback from each of OJP's program offices.



Appendix I

FY 2011 Standard Risk Indicators

The tables below outline the 15 standard assessment criteria based on potential vulnerabilities of the grant and grantee. Grant managers provide responses (i.e., “Yes/No” or “High/Medium/Low”) which are assigned weighted values, and the monitoring priority for a particular award is based on the assessment score, or total point value of all assessment criteria responses associated with that award.

Standard Monitoring Assessment Criteria—Yes/No

Assessment Criteria	Yes	No
Grantee Organization	Select Yes if grantee organization is an Indian Tribe, For-Profit, Faith-based or Individual.	Otherwise, select No.
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; or • generates income or interest income or program. ** This does not apply to JAG awards	Otherwise, select No.
New Purpose Area, Program, or Grantee	Select Yes if a grant program: <ul style="list-style-type: none"> • is a new program within OJP within the last two fiscal years; or • is a Congressional Earmark; or • is a first time grantee within OJP. 	Select No if the grant is competitive or formula.
American Reinvestment and Recovery Act (Recovery Act)	Select Yes if a grant program: <ul style="list-style-type: none"> • is a grant awarded under the Recovery Act. 	Otherwise, select No.
High Profile/Sensitive Grants	Select Yes if the grant, program, or subject matter: <ul style="list-style-type: none"> • involves intense scrutiny by the Administration, Congress, media, Department, or Office that makes it high profile or sensitive, 	Otherwise, select No.



Assessment Criteria	Yes	No
Complexity of the Award	Select Yes if the grant, program, or subject matter is complex compared to other programs and requires additional oversight. Examples of complex programs/award include: <ul style="list-style-type: none"> • awards with several distinct purpose areas and many Memorandum of Understanding (MOUs) or Service Line Agreements (SLAs) with the exception of JAG awards; or • TA grantees providing assistance in multiple subject areas; or • awards with several distinct purpose areas that involves frequent government interaction (i.e. multiple sub-awards requiring sub-recipient monitoring). 	Otherwise, select No.
Non - Compliant Closeout	Select “Yes” if the grantee has had a non-compliant closeout in the past 3 years.	Otherwise, select No.

Standard Monitoring Assessment Criteria—High/Medium/Low

Assessment Criteria	High	Medium	Low
Special Conditions Indicators	Select “High” if a grantee: <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; or • has a special condition related to withholding of funds. ** CCR special indicators are not applicable	Select “Medium” if the grant has special conditions beyond the standard special conditions that require the grantee to take action within a specified timeframe (e.g. provide a program narrative, deliverables, or attend training).	Select “Low” if grantee is currently in compliance with award special conditions and has no additional special conditions requiring the grantee to take actions within a specified timeframe.



Assessment Criteria	High	Medium	Low
Performance Measures	Select “High” if a grantee: <ul style="list-style-type: none"> has not submitted required performance measurement data; or has submitted inadequate performance measurement data and is not taking appropriate action to address performance data issues. 	Select “Medium” if a grantee has submitted incomplete or inadequate performance measurement data by specified due dates, and is taking appropriate action to address data issues.	Select “Low” if a grantee has submitted adequate, complete reporting performance measurement data by specified due dates.
Concerns from Prior Desk Reviews and/or Monitoring Visits	Select “High” if: <ul style="list-style-type: none"> issues for resolution from prior desk reviews and/or monitoring visits remain unresolved for more than a year or has remained open longer than sufficiently necessary to address an issue; or there is evidence of poor performance or suspected fraud, waste, or abuse. 	Select “Medium” if issues for resolution from prior desk reviews and/or monitoring visits have been resolved within the past year.	Select “Low” if <ul style="list-style-type: none"> there are no concerns from prior desk reviews and/or monitoring visits; concerns are minor whether resolved or unresolved; or this is new grantee.
Nonresponsive Grantee	Select “High” if grantee is: <ul style="list-style-type: none"> currently nonresponsive to office requests. 	Select “Medium” if grantee currently acknowledges office requests, but has not addressed the request to the program manager’s satisfaction.	Select “Low” if grantee is currently responsive to office requests.
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.			



Assessment Criteria	High	Medium	Low
Financial Status Report Indicators	Select “High” if the grantee has: <ul style="list-style-type: none"> repeatedly not submitted a Federal Financial Report (FFR) by the established due date; or repeatedly submitted an FFR that is incomplete or inaccurate; or repeatedly has not met the financial requirements of the grant/award or has spending patterns indicating unusually high rates of spending (determined via review of progress report, federal outlays on FFR and approved budget). 	Select “Medium” if the grantee <ul style="list-style-type: none"> is currently delinquent in submitting an FFR; or has recently submitted a FFR that is incomplete or has obvious errors that require it to be resubmitted; or is currently not meeting the financial requirements of the grant/award or has spending patterns indicating unusually high rates of spending. 	Select “Low” if the grantee does not have a history of late, incomplete, or inaccurate FFRs and is meeting the financial requirements of the grant award.
Programmatic Report Indicators	Select “High” if the grantee has: <ul style="list-style-type: none"> repeatedly not submitted a programmatic report by the established due date; or repeatedly submitted a programmatic report that is incomplete or inaccurate; or repeatedly been unresponsive to change requests; or repeatedly failed to produce agreed upon deliverables; or repeatedly submitted a tangible work product such as a report, or training curriculum, that was of low quality; or repeatedly failed to improve deliverables or address concerns as communicated with the grantee in key correspondence. 	Select “Medium” if the grantee <ul style="list-style-type: none"> is currently delinquent in submitting a report; recently submitted a report that is incomplete or inaccurate; is currently unresponsive to change requests; or has recently 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. 	Select “Low” if the grantee is compliant with programmatic reporting requirements; has produced only quality deliverables; or does not include or require deliverables.



Assessment Criteria	High	Medium	Low
High Risk Grantee	<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>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. <p>If the system populates a “Medium” response, the associated award’s monitoring priority will automatically be marked as at least a Medium.</p>	<p>The system shall automatically populate the criteria of “Low” 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>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>		
Implementation Issues	<p>Select “High” if:</p> <ul style="list-style-type: none"> • there are currently implementation delays or obstacles to the grantee’s ability to meet program objectives; or • the grantee repeatedly requests scope changes, key personnel changes, or project budget modifications. 	<p>Select “Medium” if:</p> <ul style="list-style-type: none"> • concerns related to implementation of the program are currently being addressed, but are not yet resolved; or • if concerns related to the implementation of the program have been resolved within the past year. 	<p>Select “Low” if:</p> <ul style="list-style-type: none"> • there have been no concerns related to the implementation of the program within the past year; or • this is a new grantee with no implementation history.

FY 2011 Office Specific Risk Indicators

In addition to the 15 standard risk indicators, program offices could designate up to 5 additional office-specific criteria. The table below provides a description of the office-specific assessment criteria used to prioritize monitoring activities, and specifies the office using the criteria.



Assessment Criteria	Response Option 1	Response Option 2	Response Option 3	Program Office Using Criterion
Awards Open > 4 Years	The system shall automatically populate desk review criteria response of “Yes” if award has been open longer than 48 months.	The system shall automatically populate desk review criteria response of “No” if award has been open less than 48 months, based on calculation of time between Initial Award Date and October 1st of current fiscal year.	-	BJA
Grantees With Multiple Active Awards	The system shall automatically populate desk review criteria response of “High” if the grantee has more than 5 active awards within the program office.	The system shall automatically populate desk review criteria response of “Medium” if the grantee has between 2 and 5 active awards within the program office.	The system shall automatically populate desk review criteria response of “Low” if the grantee has fewer than 2 active awards within the program office.	BJA
Grants With No Financial Clearances	The system shall automatically populate desk review criteria response of “Yes” if award does not have a financial clearance memo in GMS, with the exception of RSAT and JAG awards.	The system shall automatically populate desk review criteria response of “No” if award has a financial clearance memo in GMS.	-	BJA
Dollar Value of Award	The system shall automatically populate desk review criteria response of “High” if grant award amount is greater than or equal to \$750,000.	The system shall automatically populate desk review criteria response of “Medium” if grant award amount ranges between \$749,999 and \$100,000.	The system shall automatically populate desk review criteria response of “Low” if grant award amount is less than \$100,000.	BJA
Grantee Conducting Data Collection and Other Statistical Activities	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.	Otherwise, select “No.”	-	BJS



Assessment Criteria	Response Option 1	Response Option 2	Response Option 3	Program Office Using Criterion
Grantees With Multiple Active Awards	The system shall automatically populate desk review criteria response of “High” if the grantee has more than 5 active awards within the program office.	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.	The system shall automatically populate desk review criteria response of “Low” if the grantee has fewer than 3 active awards within the program office.	BJS
Dollar Value of Award	The system shall automatically populate desk review criteria response of “High” if grant award amount is greater than or equal to \$1,000,000.	The system shall automatically populate desk review criteria response of “Medium” if grant award amount ranges between \$500,000 and \$999,999,999.	The system shall automatically populate desk review criteria response of “Low” if grant award amount is less than or equal to \$499,999.	BJS
Awards With Unobligated Balances	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.	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.	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.	CCDO
Statutory Limit of \$1,000,000	Select “Yes” if the \$1,000,000 limit will impact the site’s funding (if eligible) for this fiscal year. 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."	Otherwise, select “No.”	-	CCDO



Assessment Criteria	Response Option 1	Response Option 2	Response Option 3	Program Office Using Criterion
Fiscal Agency Serving More than One Site	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.	Otherwise, select "No."	-	CCDO
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 less than 3/4 of the Benchmarks.	Select "Low" if grantee is meeting greater than or equal to 3/4 of the Benchmarks.	CCDO
	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.			



Assessment Criteria	Response Option 1	Response Option 2	Response Option 3	Program Office Using Criterion
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
Final Technical Report Indicators	Select "High" if the grantee has: <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. 	Select "Medium" if the grantee does not have a history of failure to submit a Final Technical report, but: <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. 	Select "Low" if there are no Final Technical report indicators or if the grantee does not have a history of submitting late, incomplete, or inaccurate Final Technical reports, but within the past 3-4 years: <ul style="list-style-type: none"> • was delinquent in submitting a report; or • submitted a report that was incomplete or inaccurate. 	NIJ
	Final Technical reports are those that are required by the Program Office at award closeout.			



Assessment Criteria	Response Option 1	Response Option 2	Response Option 3	Program Office Using Criterion
Data Set Indicators	Select “High” if the grantee has: <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. 	Select “Medium” if the grantee does not have a history of failure to submit a required Data Set, but: <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. 	Select “Low” if there are no Data Set indicators or if the grantee does not have a history of submitting late, incomplete, or inaccurate Data Sets, but within the past year: <ul style="list-style-type: none"> was delinquent in submitting a Data Set; or submitted a Data Set that was incomplete or inaccurate. 	NIJ
	Data Sets are those that are required by the Program Office at award closeout.			
Grantees With Multiple Active Awards	The system shall automatically populate desk review criteria response of “High” if the grantee has more than 5 active awards within the program office.	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.	The system shall automatically populate desk review criteria response of “Low” if the grantee has fewer than 3 active awards within the program office.	NIJ
Grantees Requiring Training and/or Technical Assistance	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.	Select “Medium” if the grantee requires some training and/or technical assistance; contact with the program manager, DCTAT contractor, or TA provider is regular but not intensive.	Select “Low” if the grantee does not require training and/or technical assistance; grant initiates contact with program manager, DCTAT contractor, or TA provider, but contact is infrequent.	OJJDP
	The determination of what constitutes significant oversight must be determined by the program manager and applied evenly to all grantees and grant programs.			



Assessment Criteria	Response Option 1	Response Option 2	Response Option 3	Program Office Using Criterion
Grantees With Multiple Active OJJDP Awards	The system shall automatically populate desk review criteria response of “High” if the grantee has more than 5 active awards within OJJDP.	The system shall automatically populate desk review criteria response of “Medium” if the grantee has between 2 and 5 active awards within OJJDP.	The system shall automatically populate desk review criteria response of “Low” if the grantee has fewer than 2 active awards within OJJDP.	OJJDP
ARRA Only— Noncompliant with <u>FederalReporting.gov</u> Reporting Requirements	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.	Otherwise, select “No.” This question applies ONLY to American Recovery and Reinvestment Act grants.	-	OJJDP
ARRA Only— Inaccurate Job Creation/Retention Figures	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.	Otherwise, select “No.” This question applies ONLY to American Recovery and Reinvestment Act grants.	-	OJJDP
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