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

FY 2015 DOJ Programmatic and Financial Monitoring Levels

September 2016

Final Report

About this Report

The Office of Justice Programs (OJP), the Office of Community Oriented Policing Services (COPS Office), and the Office on Violence Against Women (OVW) are the three grant-making components within the U.S. Department of Justice (DOJ). OJP's mission is to increase public safety and improve the fair administration of justice across America through innovative leadership and programs. The COPS Office's mission is to advance the practice of community policing in the nation's state, local, territory, and tribal law enforcement agencies. OVW's mission is to provide federal leadership in developing the national capacity to reduce violence against women and administer justice for and strengthen services to victims of domestic violence, dating violence, sexual assault, and stalking. As a critical component of grant administration, grant monitoring is intended to ensure the financial and programmatic integrity and accountability of grantees. The OJP program offices, the COPS Office, and OVW are responsible for monitoring their grants and grant programs, which must include the review of the programmatic, financial, and administrative elements of their grants. In addition to programmatic monitoring, OJP's Office of the Chief Financial Officer (OCFO) conducts monitoring focused on the grantee's financial management processes for all three grant making components. While the COPS Office and OVW are each a single organizational entity, OJP consists of the following six bureaus and offices, collectively referred to as *program offices*:

- ◆ Bureau of Justice Assistance (BJA)
- ◆ Bureau of Justice Statistics (BJS)
- ◆ National Institute of Justice (NIJ)
- ◆ Office of Juvenile Justice and Delinquency Prevention (OJJDP)
- ◆ Office for Victims of Crime (OVC)
- ◆ 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 Fiscal Year (FY) 2007, OAAM has provided oversight of OJP and the COPS Office monitoring activities. OAAM's monitoring oversight function includes the following activities: development of OJP-wide grant monitoring standards, procedures, and tools; coordination of the annual DOJ monitoring plan; assessing the quality and completeness of in-depth monitoring activities; and tracking annual monitoring progress to ensure that program offices monitor at least 10% of their open award funds annually, as required by Public Law 109-162, "Violence Against Women and Department of Justice Reauthorization Act of 2005". Under Public Law 109-162, OAAM does not have oversight authority of the Office on Violence Against Women (OVW); however, beginning in FY 2014, in cooperation with OVW, OAAM began including OVW monitoring results in the annual report to provide a perspective on DOJ's grant monitoring inclusive of all three grant-making components.

This report was prepared by OAAM's Enterprise Risk Management and Oversight Team and discusses the monitoring process; FY 2015 improvements to monitoring priorities and procedures; and the FY 2015 monitoring statistics for OJP, the COPS Office, OVW, and OJP's OCFO. For questions regarding the content or distribution of this report, please contact Ralph Martin, Director of OAAM, at (202) 514-0692.



Acronyms

ARD	Audit and Review Division
BJA	Bureau of Justice Assistance
BJS	Bureau of Justice Statistics
COPS	Office of Community Oriented Policing Services
DOJ	Department of Justice
EOBGR	Enhanced Office-Based Grant Review
EPDR	Enhanced Programmatic Desk Review
GAT	Grant Assessment Tool
FFR	Federal Financial Report
FY	Fiscal Year
FLS	First-Line Supervisor
FMIS2	Financial Management Information System
JAG	Justice Assistance Grant Program
MOSV	Multi-Office Site Visit
NIJ	National Institute of Justice
OAAM	Office of Audit, Assessment, and Management
OCFO	Office of the Chief Financial Officer
OCIO	Office of the Chief Information 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



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1. Executive Summary

OAAM reports annually on the monitoring activities of OJP's program offices and the COPS Office to identify overall performance levels during the fiscal year and opportunities for continued improvement. OJP, the COPS Office, and OVW followed their established monitoring processes to assess their open, active grants to set monitoring priorities, form fiscal year monitoring plans, and conduct monitoring activities.

At the start of FY 2015, DOJ had 9,821 open, active grants totaling \$8.0 billion spread across its three grant making components. Table 1 displays the distribution of grants and award amounts across the three components. To ensure program offices meet or exceed required monitoring thresholds, and in an effort to encourage priority-based selections for in-depth monitoring, all three grant making components use an automated grant risk assessment tool (GAT) to assess

TABLE 1

DOJ FY 2015 open, active grants

	Number of Grants	Award Amount (in millions)
FY 2015 Open, Active		
OJP	6,102	\$5,350.8
COPS Office	1,870	\$1,310.2
OVW	1,849	\$1,297.6
DOJ Total	9,821	\$7,958.6

their open, active awards against a set of criteria at the beginning of each fiscal year. Monitoring decisions made using information from each grant making component's GAT are the basis for the DOJ Programmatic and Financial Monitoring Plan.

The DOJ components selected a total of 1,367 grants totaling \$2.0 billion for in-depth monitoring at the beginning of the fiscal year, as shown in Table 2. At the end of the fiscal year, DOJ had completed in-depth

TABLE 2

FY 2015 in-depth monitoring for OJP, the COPS Office, OVW and OCFO

	Number of Grants			Award Amount (in millions)		
	Monitoring Required	Monitoring Planned	Monitoring Completed	Monitoring Required	Monitoring Planned	Monitoring Completed
Programmatic Monitoring						
OJP	610	847	781	\$535.1	\$1,238.2	\$1,048.7
COPS Office	N/A*	89	83	\$131.0	\$137.4	\$131.8
OVW	N/A*	154	77	N/A**	\$115.1	\$59.0
Subtotal	N/A	1,090	941	N/A	\$1,490.7	\$1,239.5
Financial Monitoring						
OCFO monitoring of OJP, COPS Office, and OVW grants	N/A	466	482	N/A	\$893.6	\$950.5
Total Programmatic and Financial Monitoring	N/A	1,556	1,423	N/A	\$2,384.3	\$2,190.0
Total Programmatic and/or Financial Monitoring (minus OCFO overlap)***	N/A	1403	1,269	N/A	\$2,071.5	\$1,902.8

*The COPS Office and OVW do not have monitoring requirements based on the number of grants.

**OVW does not have a monitoring requirement based on award amount.

***The total is the sum of DOJ components programmatic monitoring and OCFO financial monitoring minus the grants overlap between OCFO and the DOJ components.



programmatic monitoring on 941 grants totaling \$1.2 billion.

The variance between planned and completed monitoring reflects updates to the in-depth monitoring plans throughout the year. Each quarter, the GAT is updated to reflect any changes in the risk criteria. At that point in time, the grant managers decide whether adjustments to their monitoring plan are necessary based on changes in the risk criteria, resources, or scheduling. In addition, completion of financial monitoring may affect whether a grant manager chooses to monitor a particular award.

- OJP completed programmatic monitoring on 781 grants totaling \$1.0 billion, exceeding its statutory monitoring requirement by \$513.7

million and its internal target of number of grants.

- The COPS Office completed in-depth monitoring on 83 grants totaling \$131.8 million, exceeding its statutory monitoring requirement by \$801,960.
- OVW completed monitoring on 77 grants totaling \$59.0 million, covering 6% of its open award amount.
- The OCFO completed site visits on 482 OJP, the COPS Office, and OVW grants totaling \$950.5 million.

In total, 1,269 DOJ grants worth \$1.9 billion were programmatically and/or financially monitored in FY 2015, as shown in Table 2.

REPORT HIGHLIGHTS

FY 2015 DOJ In-depth Programmatic Monitoring Statistics

- ◆ OJP exceeded its statutory monitoring requirement by \$513.7 million.
- ◆ Each OJP program office individually exceeded its statutory and additional OJP monitoring requirements.
- ◆ OJP's FY 2015 completed monitoring was a 14% decrease in the award amount monitored and a 20% increase in the number of awards monitored, compared to FY 2014.
- ◆ OJP has made progress towards its goal to conduct monitoring earlier in the fiscal year. FY 2015 Q1 saw a higher percentage of monitoring conducted than the first quarter of the past four fiscal years.
- ◆ 31% of OJP's in-depth programmatic monitoring was conducted through EPDRs, as compared to 59% in 2014.
- ◆ The COPS Office exceeded its statutory monitoring requirement by \$0.8 million.
- ◆ The COPS Office's FY 2015 completed monitoring was a 32% decrease in the award amount monitored and a 47% decrease in the number of awards monitored from FY 2014.
- ◆ 34% of the COPS Office's in-depth programmatic monitoring was conducted by EOBRs, which covered 28 grants.
- ◆ The COPS Office completed the majority of its monitoring in Q3, as measured by dollar amount monitored. It monitored the greatest number of grants in Q2 and Q3 (41% in each quarter).
- ◆ In FY 2015, OVW program specialists completed monitoring of 72 grantees and 77 grants, falling short of its goal to monitor 10% of its grantees.¹
- ◆ OVW completed 35% of its monitoring for grantees in Q1.

¹ Inadequate staffing, hiring constraints and shifting priorities limited OVW's ability to meet its monitoring plan.



FY 2015 DOJ Financial Monitoring Statistics

- ◆ OCFO conducted on-site financial monitoring for 482 OJP, COPS Office, and OVW grants totaling \$950.5 million (5% of the open, active grants and 12% of award amount across components).
- ◆ OCFO conducted financial desk reviews on 433 (4%) of DOJ's open, active grants.
- ◆ OCFO monitored 1% more grants than planned for OVW, 4% more for OJP, and 5% more for the COPS Office.
- ◆ OCFO completed the majority of its monitoring in Q4 both in terms of number of awards (38%) and in terms of dollar amount monitored (47%).
- ◆ OCFO financial monitoring identified issues in 467 (97%) grants reviewed.
- ◆ OCFO identified 2,123 weaknesses and \$22.64 million in questioned costs in the 915 grants reviewed through either on-site monitoring or financial desk reviews.

FY 2015 Other Key Statistics

- ◆ OJP grant managers conducted desk reviews on 6,760 grants, or 100% of all active grants.
- ◆ Among the 35 active grantees on the DOJ High-Risk List at the beginning of FY 2015, 11 (31%) were programmatically and/or financially monitored over the past 4 fiscal years.
- ◆ In FY 2015, 30% of all OJP programmatic monitoring packages were submitted and/or approved after the 45-day deadline.
- ◆ The number of joint site visits between OJP program offices and OCFO increased by 45% from FY 2014.
- ◆ OJP grant managers identified issues for resolution for 16% of the total number of grants monitored in FY 2015.



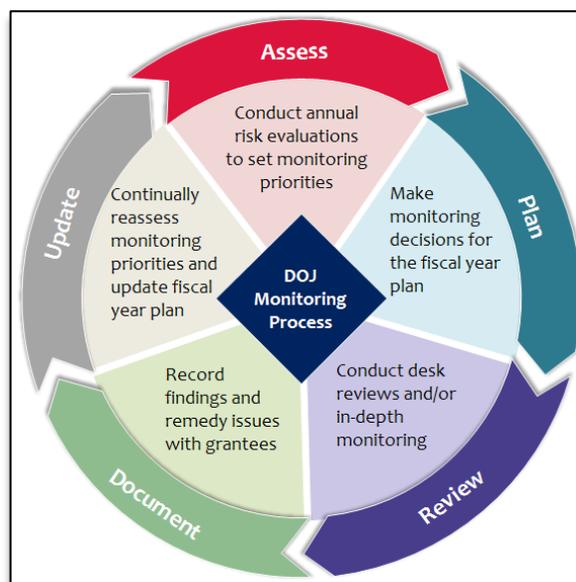
2. FY 2015 DOJ Monitoring

2.1 Monitoring Requirements and Process

Proactive monitoring activities ensure that the grantee is in compliance with the programmatic, administrative, and financial requirements within the framework of relevant statutes, regulation, policies, and guidelines. OJP program offices, the COPS Office, and OVW 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 ongoing substantive communication, desk reviews, and in-depth monitoring, which includes both on-site visits and remote monitoring activities. In addition to programmatic monitoring, OCFO conducts on-site monitoring focused on the grantee's financial management and internal control processes. OCFO also conducts financial desk reviews to review key items that may be indicators of non-compliance with grant requirements.

FIGURE 1

DOJ Monitoring Process



2.1.1 Monitoring Requirements

Each fiscal year, OJP, and the COPS Office are required to fulfill a statutory requirement to programmatically monitor 10% of the total open, active award amount. In addition, all OJP program offices are required to monitor 10% of the total number of their open, active grants. FY 2015 was the first year BJA was also required to monitor 10% of its open, active awards, as the requirement in prior years had been 5% of its open, active awards due to its large number of awards. While OVW does not have a statutory requirement, it has several annual grant monitoring targets, including conducting on-site monitoring on at least 10% of grantees, including 50% of its grantees on the DOJ high risk list, and 50% of a program's highest risk grantees. In addition, it aims to conduct office based reviews on at least 5% of grantees each year.

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 for OJP and the COPS Office, are based on open, active total award amounts and total number of grants as of the beginning of FY 2015, October 1, 2014. For OVW, the number of open, active grants used to calculate monitoring thresholds was determined in April 2014, when OVW's GAT was opened.



2.1.2 Automated Grant Risk Assessment

To ensure program offices meet or exceed required monitoring thresholds, and in an effort to encourage priority-based selections for in-depth monitoring, all three grant making components use an automated grant risk assessment tool to assess their open, active awards against a set of criteria at the beginning of each fiscal year. Monitoring decisions made using information from each grant making component's grant assessment tool (GAT) are the basis for the DOJ Programmatic and Financial Monitoring Plan. This plan, which is developed at the beginning of each fiscal year and identifies grants to be monitored, is referred to by OAAM as *planned monitoring*. OAAM worked closely with all components to coordinate monitoring plans to increase the number of joint financial and programmatic site visits.

In FY 2015, OJP's automated grants assessment tool (OJP GAT) utilized 33 risk criteria derived from existing information about the financial, administrative, and programmatic performance of grants from Grants Management System (GMS) and the Financial Management Information System (FMIS2). See Appendix A for a full list of the criteria. These risk criteria include such elements as award amounts, compliance with reporting requirements, high-risk status of grantee, whether the program is new, and whether funds have been withheld under a previous or current grant. All open and active grants are assessed quarterly against the risk criteria and are assigned a monitoring priority of high, medium, or low. OJP program offices review the OJP GAT results, determine which grants will receive in-depth monitoring, and document these decisions in the tool. OCFO also uses the OJP GAT results to select grants for financial desk reviews and the aggregate grant scores to select grantees for on-site in-depth monitoring. Additionally, the OJP GAT enables grant managers to submit an OCFO special request to review issues they have identified through monitoring activities. OCFO reviews these requests and adds them to its monitoring plan as warranted.

The COPS Office maintains its own version of the grant assessment tool (COPS Office GAT) to assess all of its open, active grants at the beginning of each fiscal year. The COPS Office GAT is an automated tool 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. See Appendix D for a full list of risk criteria. The COPS Office provides OAAM with a monitoring plan based on monitoring decisions documented in its tool.

OVW also maintains its own version of the grant assessment tool (OVW GAT) to assess all of its open, active grants. Unlike OJP and the COPS Office, OVW completes its risk assessments between April 1st and July 31st on grants that are active as of April 1st. Program specialists answer 13 questions in the OVW GAT tool. See Appendix E for the risk assessment questions answered by OVW program specialists. The OVW GAT, which is a Microsoft Access database, determines a risk assessment scope based on the responses provided by the program specialist. The program specialist must then perform a comparative review of the risk assessment results to determine which grants will require on-site monitoring and office-based reviews and therefore included in OVW's monitoring plan.



2.1.3 Monitoring Review Activities

All three grant making components follow a prescribed monitoring process to ensure that the monitoring requirements are met, time and resources are spent wisely, priorities are reassessed on a regular basis, and monitoring is properly conducted and documented. The monitoring process consists of the following key steps:

1. Conduct an automated grant risk assessment
2. Develop a program office/component specific monitoring plan using risk scores and other known information
3. Engage in monitoring review activities
4. Document monitoring outcomes and findings
5. Work with grantee to remedy identified issues
6. Reassess and update monitoring priorities regularly

The components conduct monitoring through several different monitoring types:

Substantive Communication: Substantive communication is ongoing throughout the year and includes intensive work with grantees by mail, email, or phone. Substantive communication provides an opportunity for monitors to address identified concerns with the grantee, to work with the grantee to develop a work product or strategy, and/or to answer grantee questions. The monitor also reviews and/or approves reports submitted by the grantee on a quarterly, bi annual or annual basis, such as Federal Financial Reports (FFR), Progress reports, and performance measurement reporting.

Desk Reviews:

- ◆ *Programmatic Desk Review* - Desk reviews facilitate grant monitoring throughout the grant award period and help grant managers prepare for in-depth monitoring. Monitors from the components conduct programmatic desk reviews with a comprehensive review of materials available in the grant file to determine administrative and programmatic compliance and monitor recipient performance.
- ◆ *Financial Desk Review* - OCFO conducts financial desk reviews on selected grants from the components to review key items that may be indicators of noncompliance with grant terms and conditions. For example, a financial desk review determines whether the grantee has drawn more cash than the expenditures reported on the most recent Federal Financial Report (FFR). The expenditures are then calculated as a percentage of the award amount and the financial monitor reaches out to the program manager to determine whether the rate of expenditures appears to be reasonable given the performance to date.

In-Depth Monitoring:

- ◆ *On-site Monitoring* - In-depth monitoring performed by a grant manager/financial monitor at the grantee site. Grants are selected based on their monitoring priority level to mitigate risk, address specific performance areas, and/or provide targeted training and technical assistance. Financial monitoring selections are based on the aggregate score for



the grantee and each financial monitoring site visit includes the review of six to eight awards across multiple programs.

- ◆ *Remote In-depth Monitoring*– In-depth monitoring performed remotely from the grantor site. Grant managers assess the programmatic integrity and accountability of their assigned grants and grantees using virtual and telephonic communication methods for interacting with grantees and reviewing grant files. OJP refers to remote in-depth monitoring as Enhanced Programmatic Desk Reviews (EPDRs), the COPS Office refers to them as Enhanced Office Based Grant Reviews (EOBGRs), and OVW refers to them as office-based reviews
- ◆ *Enhanced Financial Desk Review* – In-depth monitoring performed remotely from the grantor site. Financial monitors assess the financial integrity and accountability of their grants and grantees using virtual and telephone communication methods for interacting with grantees and reviewing grant general ledgers and supporting documents.
- ◆ *Multi-Office Site Visit* – On-site, in-depth monitoring performed jointly by OCFO and more than one program office. Visits are determined by ranking the grantees that represent a high-risk priority to DOJ based on the results of the risk assessment process. Typically all outstanding awards, or the most active awards for the program, are reviewed in a Multi-Office Site Visit. This process assists in the identification of systemic issues that a grantee may be experiencing.

2.1.4 Quarterly Updates to Monitoring Plan

The DOJ monitoring plan is revised throughout the year to accommodate shifts in monitoring priorities due to updated risk assessments, budget constraints, emergency visits, mission objectives, as well as to include site visits to new grantees based on information shared during the application process. OAAM validates each component's monitoring data and publishes a revised monitoring plan for the OJP program offices, the COPS Office, OVW, and OCFO each quarter.

2.2 FY 2015 Improvements

In an effort to continuously improve monitoring standards and procedures and to respond to issues identified throughout FY 2015, the three grant making components completed a number of activities to improve compliance with the policies and procedures and to strengthen grantee oversight.



As part of the Justice Grants Services Network (GrantsNet), OAAM in coordination with OVW and the COPS Office, enhanced the OJP GAT to allow for a shared common functionality, achieve efficiencies and align business processes. In FY 2015, OAAM deployed the DOJ GAT for use for the development of the FY 2016 DOJ Monitoring Plan. The new DOJ GAT provides a common framework, methodology, and platform for systematically and objectively assessing risk associated with DOJ's grants and/or grantees. Program offices and OJP use this information to assist in planning and prioritizing monitoring activities based on potential vulnerabilities.



During FY 2015, OAAM developed and implemented a pre-award risk rating process as required under the new OMB Uniform Guidance (2 .C.F.R. Part 200) to assess the potential risks presented by applicants for federal grants prior to making an award. OAAM developed the pre-award risk process using the framework from the post-award Grant Assessment Tool as well as the applicant’s answers to the OJP financial management capability questionnaire which allowed for the assessment of each applicant’s financial capability in addition to programmatic and grantee related risks. This new process supports OJP’s priority to ensure integrity in the financial and programmatic management of programs and to strengthen accountability for federal dollars by improving policies and processes that protect against waste, fraud, and abuse.



During FY 2015, OAAM conducted an analysis of how program offices are identifying and resolving issues for resolution found during in-depth monitoring activities in the grant monitoring module of GMS. The study provided insights into the types of issues that program offices are identifying and the amount of time it takes issues to be resolved. In FY 2016, OAAM will use the analysis to determine improvements to the existing processes and to provide targeted guidance for identifying, tracking and resolving issues found during site visits and EPDRs.



In FY 2015, OAAM released a Quarterly Monitoring Summary Dashboard to improve monitoring oversight across OJP. The Quarterly Monitoring Summary Dashboard is an interactive tool that allows each program office to review, analyze, and drill down into their monitoring progress towards meeting their annual monitoring targets. The dashboard provides details into completed monitoring activities, adherence to the monitoring plan, as well as site visit/EPDR report delinquencies.

2.3 DOJ Grants Portfolio Demographics

At the start of FY 2015, DOJ had 9,821 open, active grants totaling \$8.0 billion spread across OJP, the COPS Office, and OVW in its grant portfolio, as seen in Table 3.

TABLE 3

OJP FY 2015 open, active grants and award amount as of October 1, 2014

	Number of Grants	Award Amount (in millions)
OJP	6,102	\$5,350.8
COPS Office	1,870	\$1,310.2
OVW	1,849	\$1,297.6
Total	9,821	\$7,958.6



Figure 2 depicts the distribution of grants in DOJ’s portfolio across the key demographic characteristics of grant type, award type, grantee type, and award amount. The characteristics of DOJ’s grant portfolio shifted from FY 2014 to FY 2015. The award type composition experienced no significant changes from FY 2014 to FY 2015. There was a small decrease in the proportion of cooperative agreements from 10% of all of DOJ’s awards in FY 2014 to 8% in FY 2015.

While municipalities and states remained the top two grantee types from FY 2014 to FY 2015, the proportion of grants awarded to each shifted. The proportion of grants to municipalities decreased from 47% to 43% and states increased from 23% to 25%. The other grantee types remained fairly constant from FY 2014 to FY 2015.

TABLE 4

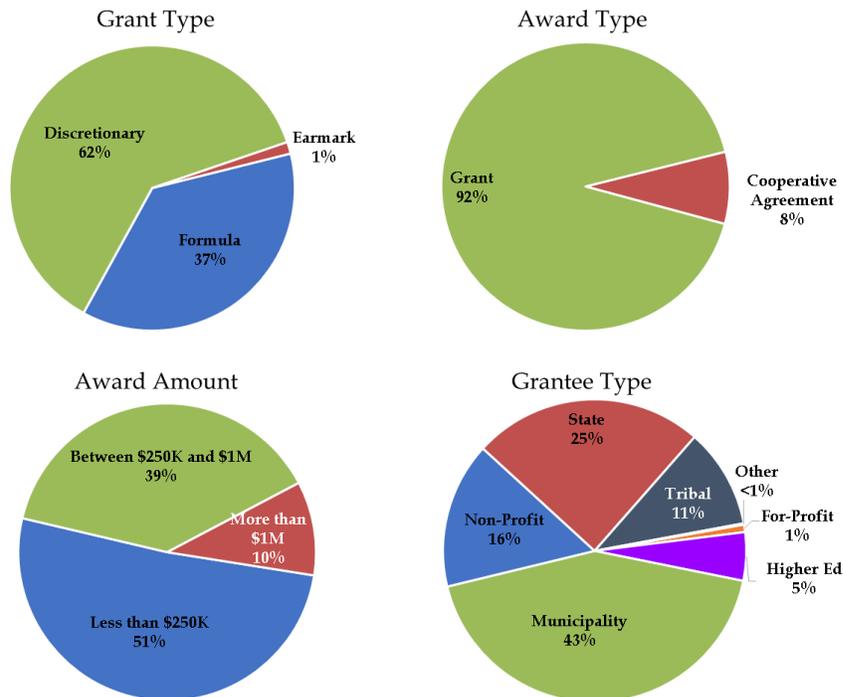
DOJ Grant Portfolio by Award Amount for FY2014 and FY2015

Award Amount	FY 2014	FY2015
\$0 – \$249,999	42%	51%
\$250,000 – \$1,000,000	43%	39%
\$1,000,001 +	15%	10%

Overall, DOJ’s grant portfolio has shifted towards awarding grants with lesser award amounts, as shown in Table 4. In FY 2015, grants under \$250,000 made up the greatest percentage of DOJ’s grants (51%), an increase in proportion from 42% in FY 2014. Grants with award amounts between \$250,000 and \$1.0 million decreased from 43% to 39% and those with award amounts greater than \$1.0 million decreased from 15% to 10% in FY 2015.

FIGURE 2

FY 2015 DOJ distribution of grants across key demographic characteristics





2.4 DOJ Coordinated Monitoring Plan

At the start of FY 2015, a total of 1,403 grants equaling \$2.1 billion were selected for in-depth programmatic or financial monitoring by the DOJ grant-making components. The plan encompassed 14.3% of DOJ's total number of grants and 26% of its active award amount. Table 5 shows the distribution of the planned monitoring across the components. OCFO included 153 grants totaling \$312.8 million in its financial monitoring plan that overlapped with the programmatic monitoring plan of the components.

TABLE 5

OJP, the COPS Office, OVW, and OCFO FY 2015 initial in-depth monitoring plan

	Number of Grants	Award Amount (in millions)
FY 2015 Initial Monitoring Plan		
OJP	847	\$1,238.2
COPS Office	89	\$137.4
OVW	154	\$115.1
OCFO	466	\$893.6
Subtotals	1,556	\$2,384.3
Totals*	1,403	\$2,071.5

* Grants selected for monitoring by multiple DOJ components are only counted once in the total.

Additional details on each of the DOJ components' planned monitoring for FY 2015 can be found in sections 3, 4, 5, and 6.

2.5 Completed Monitoring

2.5.1 FY 2015 Completed In-Depth Monitoring

In FY 2015, DOJ components completed 570 in-depth programmatic monitoring reviews (site visits and remote monitoring) for 941 grants totaling \$1.2 billion, and 48 on-site financial monitoring visits on 482 grants totaling \$950.5 million.

TABLE 6

FY 2015 completed in-depth monitoring for OJP, the COPS Office, OVW and OCFO*

	Number of Grants	Award Amount (in millions)
Programmatic Monitoring		
OJP	781	\$1048.7
COPS Office	83	\$131.8
OVW	77	\$59.0
Subtotal	941	\$1,239.5
Financial Monitoring		
OCFO monitoring of OJP, the COPS Office, and OVW grants	482	\$950.5
Total Programmatic and Financial Monitoring	1,423	\$2,190.0
Total Programmatic and/or Financial Monitoring (minus OCFO overlap)*	1,269	\$1,896.2

*The total is the sum of DOJ components programmatic monitoring and OCFO financial monitoring minus the grants overlap between OCFO and the DOJ components.

Among the 482 grants financially monitored by OCFO, 154 were also programmatically monitored by either OJP program offices or OVW. Therefore, 1,269 unique grants totaling \$1.9



billion received in-depth monitoring; either programmatically, financially, or both, in FY 2015 across all of DOJ's components. Among the 154 grants monitored by multiple offices, 94 were completed through coordinated efforts between OCFO and the program offices.

Section Highlight

OJP and the COPS Office collectively exceeded their statutory monitoring requirement by \$514.5 million.

OAAM tracks the programmatic monitoring levels to gauge the completion rates against statutory requirements and internal targets. Table 7 shows the award amounts of open, active grants; required monitoring thresholds; and completed monitoring for each grant making component. OJP as a whole exceeded the 10% requirement by \$513.7 million or almost twice the award amount required. The COPS Office also exceeded the requirement by \$0.8 million. While OVW does not have a statutory requirement, it adheres to targets based on number of grantees, including conducting on-site monitoring on at least 10% of its active grantees (determined as of the date OVW runs its risk assessment). OVW fell short of its targeted monitoring of 116 grantees in FY 2015 by 43 grantees, 37% of its target.²

TABLE 7

FY 2015 OJP, the COPS Office, and OVW open, required, and completed programmatic in-depth monitoring, by award amount (in millions)

	Open, Active Award Amount	Monitoring Required	Monitoring Completed	Amount Exceeding Requirement
OJP				
BJA	\$2,076.6	\$207.7	\$464.9	\$257.2
BJS	\$195.1	\$19.5	\$64.1	\$44.6
NIJ	\$442.3	\$44.2	\$70.5	\$26.3
OJJDP	\$880.2	\$88.0	\$161.2	\$73.2
OVC	\$1,715.5	\$171.6	\$282.3	\$110.7
SMART	\$41.0	\$4.1	\$5.8	\$1.7
OJP Total	\$5,350.8	\$535.1	\$1,048.7	\$513.7
COPS Office	\$1,310.2	\$131.0	\$131.8	\$0.8
OJP and COPS Office Subtotal	\$6,661.0	\$666.1	\$1,180.5	\$514.5
OVW	\$1,297.6	N/A*	\$59.0	N/A*
Total	\$7,958.6	N/A	\$1,239.5	N/A

* OVW does not have a monitoring requirement based on award amount. Its requirement is based on the number of grantees with open, active awards.

Table 8 shows a breakdown of each component's number of open, active grants, their required monitoring thresholds (if applicable), and the number of grants for which in-depth monitoring was completed. For OJP, the monitoring thresholds were exceeded by 171 grants. The COPS Office and OVW do not have monitoring requirements based on the number of grants.

² Inadequate staffing, hiring constraints and shifting priorities limited OVW's ability to meet its monitoring plan.



TABLE 8

FY 2015 OJP, the COPS Office, and OVW open, required, and completed programmatic in-depth monitoring, by number of grants

	Open, Active Grants	Monitoring Required	Monitoring Completed	Number Exceeding Requirement
OJP				
BJA	3,689	369	426	57
BJS	223	22	29	7
NIJ	742	74	75	1
OJJDP	850	85	152	67
OVC	462	46	84	38
SMART	136	14	15	1
OJP Total	6,102	610	781	171
COPS Office	1,870	N/A*	83	N/A
OVW	1,849	N/A*	77	N/A
Totals	9,821	N/A	941	N/A

Note: The required monitoring level for the number of grants is 10% of the number of open, active grants each year for all program offices.

* The COPS Office and OVW do not have monitoring requirements based on the number of grants.

2.5.2 FY 2015 Comparison of Planned and Completed In-Depth Monitoring

The components typically include a greater number of grants in their initial plan, constituting a greater total award amount, than is statutorily required. In FY 2015, only OCFO exceeded the initial planned monitoring set at the beginning of the year by both the number of grants and the award amount. Among the components, the COPS Office monitored the greatest proportion of its planned grants (93%), while OJP monitored 92% of its planned grants, and OVW completed monitoring for 51% of its planned grants.³

TABLE 9

OJP, the COPS Office, and OVW FY 2015 comparison of initial in-depth monitoring plan and completed monitoring

	Planned Number of Grants	Completed Number of Grants	Planned Award Amount (in millions)	Completed Award Amount (in millions)
OJP	847	781	\$1,238.2	\$1,048.7
COPS Office	89	83	\$137.4	\$131.8
OVW	154	77	\$115.1	\$ 59.0
OCFO	466	482	\$893.6	\$950.5
Subtotals	1,556	1,423	\$2,384.3	\$2,190.0
Totals*	1,403	1,269	\$2,071.5	\$1,896.2

* Grants selected for monitoring by multiple DOJ components are only counted once in the total.

³ Inadequate staffing, hiring constraints and shifting priorities limited OVW's ability to meet its monitoring plan.



2.5.3 Fiscal Year Comparison of Completed In-Depth Programmatic Monitoring

OAAM compares the amount of programmatic monitoring completed against the open, active award totals across fiscal years as a way to gauge how monitoring levels have changed over time.

TABLE 10

Comparison of FY 2012-2015 completed programmatic monitoring for OJP, the COPS Office, and OVW by award amount (in millions) and number of grants

	FY 2012	FY 2013	FY 2014	FY 2015
Award Amount				
OJP				
Total award amount of open, active grants	\$9,101.2	\$8,543.3	\$5,875.1	\$5,350.8
Award amount monitored	\$2,029.7	\$1,672.8	\$1,222.9	\$1,048.7
Percent of open, active award amount monitored	22%	20%	21%	20%
COPS Office				
Total award amount of open, active grants	\$2,535.1	\$2,264.8	\$1,880.9	\$1,310.2
Award amount monitored	\$270.2	\$228.3	\$194.4	\$131.8
Percent of open, active award amount monitored	11%	10%	10%	10%
OVW**				
Total award amount of open, active grants	N/A	N/A	\$1,278.9	\$1,297.6
Award amount monitored	N/A	N/A	\$61.0	\$59.0
Percent of open, active award amount monitored	N/A	N/A	5%	5%
Number of Grants				
OJP				
Total of open, active grants	13,134	11,451	7,037	6,102
Number of grants monitored	1,214	851	652	781
Percent of open, active grants monitored*	9%	7%	9%	13%
COPS Office				
Total of open, active grants	4,140	3,335	2,459	1,870
Number of grants monitored	253	149	157	83
Percent of open, active grants monitored	6%	4%	6%	4%
OVW**				
Total of open, active grants	N/A	N/A	1,752	1,849
Number of grants monitored	N/A	N/A	98	78
Percent of open, active grants monitored	N/A	N/A	6%	4%

** This annual report is the second year OVW figures are included and therefore only data from FY 2014 and FY 2015 are included.

In FY 2015, OJP's completed monitoring decreased 14% in the award amount monitored and a 20% increase in the number of grants monitored from FY 2014. The COPS Office decreased the number of grants by 47% and decreased the award amount monitored by 32% in FY 2015. Meanwhile, OVW decreased the number of grants by 20% and decreased the award amount



monitored by 3% in FY 2014. Table 10 compares these award amounts and number of grants monitored by OJP, the COPS Office, and OVW across fiscal years.



2.6 Joint Monitoring and Multi-Office Site Visits

Joint Site Visits and Multi-Office Site Visits

Joint Financial and Programmatic Site Visit – During the annual monitoring plan development, if a grantee has been identified as being selected by both a program manager and OCFO the offices will work together to coordinate the visit and review a limited sample of grants. Throughout the course of the year, grant managers can also request an OCFO financial monitor to accompany them on a visit if they have identified financial management concerns that need to be reviewed.

Multi-Office Site Visit – In-depth monitoring performed jointly by OCFO and more than one program office. Visits are determined at the start of each fiscal year by ranking the grantees that represent a high monitoring priority to DOJ based on the results of the risk assessment process. Typically all outstanding awards, or the most active awards for the program, are reviewed in a Multi-Office Site Visit. This process allows for a holistic review and identification of systemic issues that a grantee might be experiencing.

Section Highlight

The number of joint site visits between OJP and OCFO increased by 45% from FY 2014.

In FY 2015, DOJ continued to emphasize the planning and coordination of joint site visits across the grant-making components to maximize monitoring efforts and minimize the burden to the grantee. The COPS Office and OCFO did not conduct any joint programmatic and financial monitoring in FY 2015, whereas in FY 2014 they jointly monitored two grantees, covering eight grants and totaling \$3.5 million. OJV and OCFO conducted joint programmatic and financial monitoring for one grantee, covering one grant and totaling \$0.7 million. OJP and OCFO conducted joint programmatic and financial monitoring site visits to 29 grantees, covering 242 grants and totaling \$374.1 million. Seven of these grantee visits, covering 110 grants and \$200.1 million, were conducted through MOSVs. This was a 45% increase in the number of joint site visits conducted between OJP program offices and OCFO from FY 2014 and a 236% increase in the number of grants jointly monitored. Table 11 details the joint monitoring completed by OJP and OCFO over the last four fiscal years.

TABLE 11

FY 2012-FY 2015 joint monitoring by OJP program offices and OCFO

	FY 2012	FY 2013	FY 2014	FY 2015
Award amount monitored (in millions)	\$529.5	\$235.8	\$210.0	\$374.1
Number of grantees monitored	10	12	20	29
Number of grants monitored	181	65	72	242

Beginning in FY 2014, OAAM implemented the Monitoring Coordination Tracker, which was used in conjunction with the OJP GAT to facilitate better coordination between and within program offices and OCFO. The tracker includes all cases of overlap in plans within and between program offices and OCFO, and provides a shared space for offices to manage and document coordination efforts. In FY 2015, 88 grantees were included in the tracker after the initial monitoring decision period, of which twenty had comments added by grant managers, indicating they were considered for joint monitoring. OAAM conducted an analysis at the end of FY 2015 to identify OJP grantees that had contact with more than one program office or OCFO in the same fiscal year which may have resulted in an undue burden for the grantee in terms of time and



resources used to comply with the monitoring. OAAM found that of the 401 grantees monitored in FY 2015 by OJP program offices and OCFO, 30 were visited by more than one OJP monitoring component outside of a planned joint site visit or MOSV. While the OJP program offices and OCFO monitored more grantees (372 in FY2014), they coordinated on fewer site visits than in FY 2014 when 42 were visited by more than one OJP monitoring component outside of a planned joint site visit or MOSV.

2.7 High Risk List

DOJ's High Risk Designation Policy

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 monitoring 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.

Section Highlight

In FY 2015, DOJ programmatically monitored and/or financially monitored 31% of the grantees on the DOJ High Risk List.

Grantees on the DOJ High Risk List are given priority for in-depth monitoring. Grantees with outstanding audit issues or identified risk factors (e.g., new grantees, ongoing reporting non-compliance) can benefit from direct programmatic and/or financial technical assistance to resolve issues and work toward mitigating potential or actual risks.

DOJ had 35 grantees with 208 active grants totaling \$231.4 million on the DOJ High Risk List at the beginning of FY 2015. At the end of the fiscal year, the DOJ components had conducted in-depth programmatic monitoring for 11 high risk grantees, which included 61 grants totaling \$61.8 million. OCFO completed financial monitoring on two high risk grantees with 25 grants totaling \$52.9 million. Table 12 shows the proportion of DOJ High Risk List grantees (31%) that were programmatically and/or financially monitored in-depth in FY 2015.

OVW has an internal target of monitoring 50% of its grantees on the DOJ High Risk List during the year. OVW did not complete any in-depth monitoring of the 14 High Risk List grantees that were open and active as of October 1, 2014, falling short of its target in FY 2015.

OAAM conducted analysis on monitoring of grantees on the DOJ High-Risk List during the last four fiscal years to determine if monitoring is occurring for these grantees. Among the 35 active grantees on the DOJ High-Risk List at the beginning of FY 2015, one of the three components or OCFO had programmatically and/or financially monitored 31 of these grantees (89%) over the past 4 fiscal years⁴.

⁴ Since FY 2014 was the first year OVW completed monitoring is included in the analysis, it was not assessed if the office had monitored the grantees on the DOJ High Risk List in FY 2011 – 2013.



TABLE 12

FY 2015 DOJ open, planned, and completed programmatic and financial in-depth monitoring of high risk list grants, by number of grantees

	High Risk List Open, Active Grantees	High Risk List Completed Monitoring	High Risk List Completed Monitoring % of Open, Active Grantees
Programmatic Monitoring			
OJP			
BJA	21	11	52%
BJS	3	1	33%
NIJ	5	2	40%
OJJDP	12	3	25%
OVC	7	2	29%
SMART	2	-	-
OJP Total*	30	11	37%
COPS	8	-	-
OVW	14	-	-
Total	35	11	31%
Financial Monitoring			
OCFO	N/A	2	N/A
Total Programmatic and/or Financial Monitoring*	35	11	31%

* OJP Total is less than the sum of the program offices because some grantees had grants open, active and monitored across multiple program offices.

**Total of the components is less than the sum of the components because some grantees had grants open, active and monitored across multiple components.



3. OJP Monitoring

3.1 OJP Grants Portfolio Demographics

At the beginning of FY 2015, OJP had 6,102 open, active awards totaling \$5.4 billion distributed across OJP's six program offices as shown in Table 13.

Figure 3 depicts the distribution of grants in OJP's portfolio across the key demographic characteristics of grant type, award type, grantee type, and award amount. In FY 2015, formula grants made up the largest proportion of the awards at 55% of OJP's portfolio, the same proportion as FY 2014. However, the proportion of earmarks fell from 3% to 1%, while the proportion of discretionary grants grew from 42% in FY 2014 to 44% on FY 2015. The proportion of cooperative agreements fell from 16% in FY 2014 to 4% in FY 2015.

TABLE 13

OJP FY 2015 open, active grants and award amount as of October 1, 2014

	Number of Grants	Award Amount (in millions)
BJA	3,689	\$2,076.6
BJS	223	\$195.1
NIJ	742	\$442.3
OJJDP	850	\$880.2
OVC	462	\$1,715.5
SMART	136	\$41.0
Total	6,102	\$5,350.8

OJP uses cooperative agreements to reflect the relationship between OJP and an eligible recipient when it anticipates substantial involvement with the recipient during performance of the contemplated activity. As a result of OJP involvement in these types of awards, they are evaluated separately for monitoring purposes from standard discretionary and earmark awards.

The distribution of grants across grant types shifted slightly from FY 2014 to FY 2015. Municipality grantees decreased from 46% to 44% while state grantees increased from 31% to 33%. The distribution across the other grantee types remained fairly constant.

The number of high award amounts decreased from FY 2014 to FY 2015, as shown in Table 14. The proportion of awards less than \$250,000 increased from 42% to 67% of OJP's grant portfolio, while those with award amounts over \$1.0 million decreased from 16% to 7% from FY 2014 to FY 2015. Those with award amount from \$250,000 to \$1.0 million also decreased from 42% to 26% from FY 2014 to FY 2015.

TABLE 14

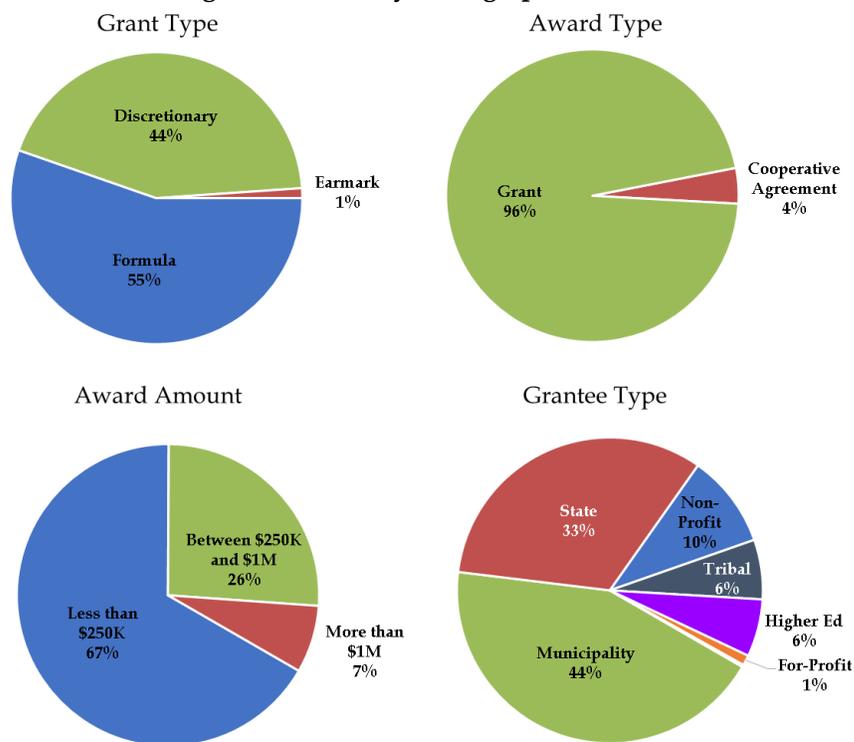
OJP Grant Portfolio by Award Amount for FY2014 and FY2015

Award Amount	FY 2014	FY2015
\$0 - \$249,999	42%	67%
\$250,000 - \$1,000,000	42%	26%
\$1,000,001 +	16%	7%



FIGURE 3

FY 2015 OJP distribution of grants across key demographic characteristics



3.2 Monitoring Plan and Priorities

3.2.1 OJP Monitoring Priority Levels

OAAM used the 33 risk criteria in the GAT to generate risk scores and program office monitoring priority levels for 9,198 of OJP’s open, active grants at the beginning of the fiscal year⁵. This initial assessment resulted in a high monitoring priority rating for 734 (8%) grants, a medium priority rating for 1,862 (20%) grants, and a low priority rating for 6,602 (72%) grants. Figure 4 displays the distribution of monitoring priority based on the initial risk assessment.

⁵ OAAM ran the FY 2015 risk assessment on September 16, 2014 and of the grants assessed, 5,909 were open and active on October 1st, 2013 to be chosen for monitoring.



Some of the 33 risk criteria that OAAM uses affect a greater number of grants than others. For example, many grants receive points for broad demographic criteria (such as grantee type, award type and award amount), while certain criteria (such as confidential funds or DOJ High-Risk List) only apply to a narrow and specific subset of OJP grants. Figure 5 displays the ten criteria that affect the largest number of grants. The frequency of all 33 risk indicators may be found in Appendix B. In Appendix C, the contribution of points by each of the criteria is displayed.

FIGURE 4
 FY 2015 OJP distribution of monitoring priority levels based on initial risk assessment

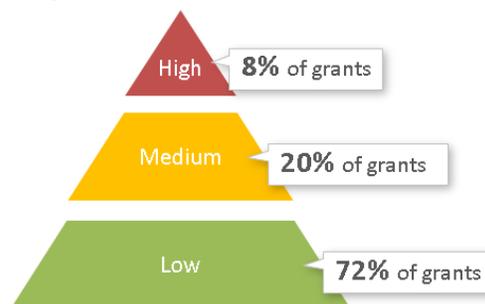


FIGURE 5
 Top 10 risk criteria by the percentage of grants receiving points at the beginning of FY 2015



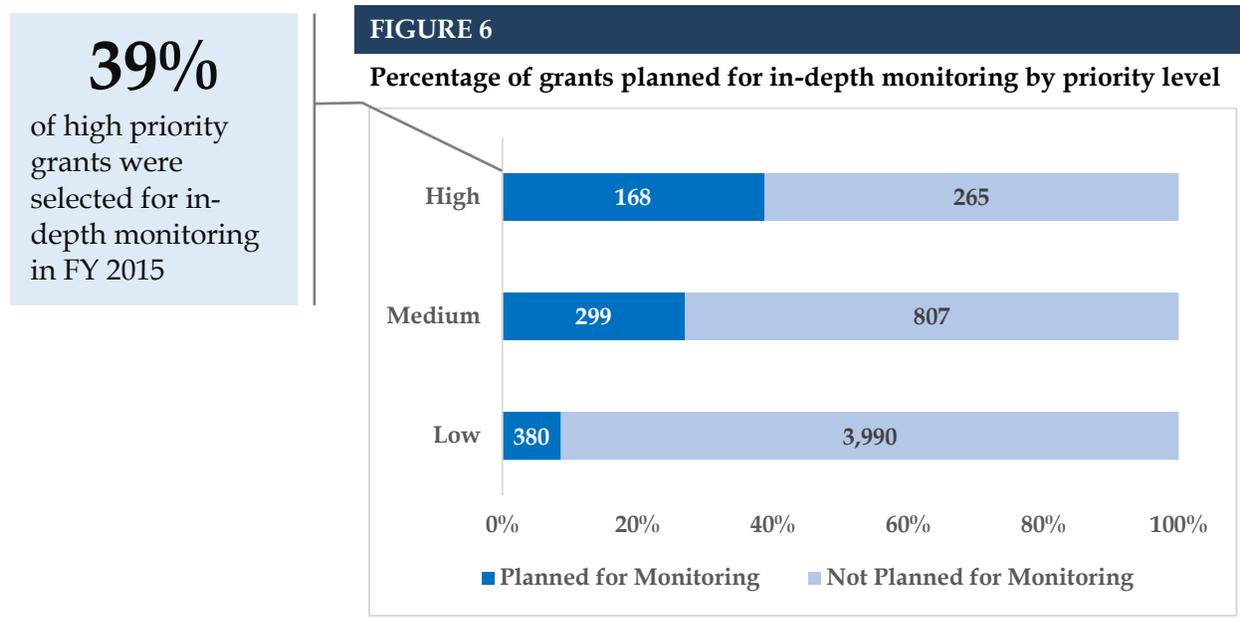
3.2.3 In-Depth Programmatic Monitoring Decisions

One of the primary purposes of the initial risk assessment is to assist grant managers in making informed decisions on where to focus their in-depth monitoring efforts during the fiscal year. Program offices are encouraged to focus on high and medium priority grants.

At the end of the FY 2015 initial monitoring decision period, OJP grant managers had planned to conduct in-depth monitoring for 847 grants (14% of open, active grants). As demonstrated in Figure 6, among all the grants assessed as high priority, program offices selected 39% for



monitoring, compared to selecting 9% of those assessed as low priority, demonstrating that program offices are targeting high priority grants in their monitoring efforts.



In FY 2015, grant managers were required to select one of four standard justification comments in the OJP GAT if they chose not to monitor a high or medium priority grant. For high and medium priority grants not selected for monitoring, the justifications were:

- Grant has already been monitored in its lifetime,
- New grant/ too early to monitor,
- Grant about to expire (less than 3 months), or
- Grant manager discretion

If “Grant manager discretion” was selected, additional justification narrative was required. Table 15 shows that the most common justification comment selected for not monitoring high and medium priority grants were “Grant manager discretion.” The most common narratives provided were “Higher priority grants were selected” or “Other grants were selected” or a similarly-worded comment. While most program offices used “Grant manager discretion” as the most common justification for not monitoring, BJA and SMART most commonly selected “Grant has already been monitored in its lifetime” as the justification for not monitoring high priority grants.



TABLE 15

FY 2015 justifications provided by grant managers when choosing not to programmatically monitor high and medium priority grants

	Totals
High Priority	
Grant Manager Discretion	183
Grant has already been monitored in its lifetime	88
Grant about to expire (less than 3 months)	34
New Grant/too early to monitor	17
Medium Priority	
Grant Manager Discretion	842
Grant has already been monitored in its lifetime	198
Grant about to expire (less than 3 months)	118
New Grant/too early to monitor	171
Totals	
Number of grants*	1,651

*Total number of grants differ from those in Figure 6 above due to changes in the active status of grants between the time they were assessed in the GAT and the time they were reviewed by grant managers for a monitoring decision.

3.3 OJP Program Office Desk Reviews

OJP Desk Review Policy

OJP program offices must complete a desk review for each open, active grant at least once annually.

Section Highlight

In FY 2015, OJP grant managers conducted desk reviews on 6,760 grants, or 100% of grants requiring an annual desk review.

OJP program offices conduct annual desk reviews on all active grants to assess progress toward stated project goals and objectives, and to review grantee submitted reports and other information in the existing grant file to determine programmatic and administrative compliance. In FY 2015, OJP grant managers conducted desk reviews on 6,760 grants, or 100% of grants requiring an annual desk review. This is the third year in which OJP program offices have completed 100% of the required desk

reviews. Table 16 shows the number of desk reviews performed by each office.

Figure 7 highlights the quarters that each program office performed their desk reviews. BJA, OVC, OJJDP completed most of their desk reviews by the end of Q2 (90%, 65%, and 64%, respectively). The SMART Office performed a very small proportion of its desk reviews in Q1, and completed most (88%) of its desk reviews in Q4. BJS and NIJ also performed the highest proportion of desk reviews in Q4 (84% and 47%, respectively). OAAM places a priority on performing desk reviews on grants early in the fiscal year. It is important to perform this basic level of monitoring early so

TABLE 16

FY 2015 desk reviews by program office

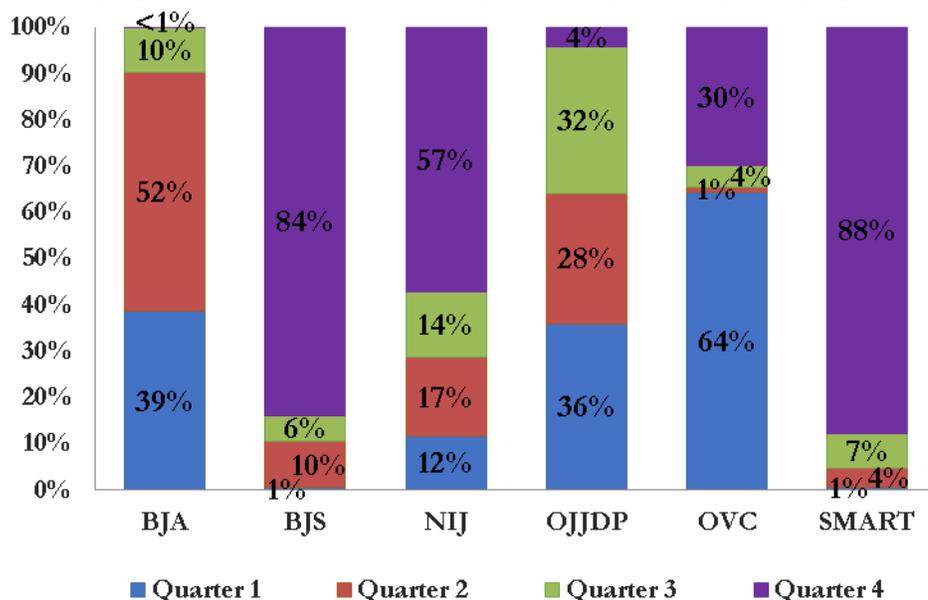
	Completed Desk Reviews
BJA	4,014
BJS	199
NIJ	923
OJJDP	960
OVC	517
SMART	147
Total	6,760



that potential risks can be identified and addressed early and in-depth monitoring can be planned and performed accordingly.

FIGURE 7

FY 2015 programmatic desk reviews completed by quarter, by OJP program office*



*The sum of the program office percentages do not total 100% due to rounding.

3.4 Completed Monitoring

3.4.1 FY 2015 Required and Completed Programmatic Monitoring

Statutory Monitoring Requirement

Each fiscal year, OJP is required to fulfill a statutory requirement to programmatically monitor 10% of the total open, active award amount. Additionally, all OJP program offices are required to monitor 10% of their total number of open, active grants.

Section Highlight

OJP program offices monitored 20% of their active award amount and 13% of their total number of active awards. Overall, OJP exceeded its internal target by 28%.

In FY 2015, OJP program offices completed 457 in-depth monitoring reviews (site visits and EPDRs) for 781 grants totaling \$1.0 billion. OJP has exceeded the statutory requirement since the inception of the statute in 2007. OJP program offices monitored 20% of their active award amount and 13% of their total number of active awards. Overall, OJP exceeded its internal target by 28%.

OAAM tracks the programmatic monitoring levels for OJP to gauge the completion rates against statutory requirements and



internal targets. Table 17 presents the award amount of open, active grants; required statutory monitoring thresholds; and completed monitoring for each program office. Each program office within OJP individually exceeded the requirement to monitor 10% of total funding by the end of FY 2015. OJP as a whole exceeded the 10% requirement by \$513.7 million, meaning it monitored almost twice the required amount.

TABLE 17

FY 2015 OJP open, required, and completed programmatic in-depth monitoring, by award amount (in millions)

	Open, Active Award Amount	Monitoring Required	Monitoring Completed	Amount Exceeding Requirement
BJA	\$2,076.6	\$207.7	\$464.9	\$257.2
BJS	\$195.1	\$19.5	\$64.1	\$44.6
NIJ	\$442.3	\$44.2	\$70.5	\$26.3
OJJDP	\$880.2	\$88.0	\$161.2	\$73.2
OVC	\$1,715.5	\$171.6	\$282.3	\$110.7
SMART	\$41.0	\$4.1	\$5.8	\$1.7
Total	\$5,350.8	\$535.1	\$1,048.7	\$513.7

Table 18 presents a breakdown of each program offices' number of open, active grants, their required OJP monitoring thresholds, and the number of grants for which in-depth monitoring was completed. All OJP program offices are required to monitor 10% of the total number of their open, active grants. FY 2015 was the first year BJA was also required to monitor 10% of its open, active awards, as the requirement in prior years had been 5% of its open, active awards due to its large number of awards. Each program office either met or exceeded their requirement. As a whole, OJP program offices exceeded the required threshold by 171 grants (28%).

TABLE 18

FY 2015 OJP open, required, and completed programmatic in-depth monitoring, by number of grants

	Open, Active Grants	Monitoring Required	Monitoring Completed	Number Exceeding Requirement
BJA	3,689	369	426	57
BJS	223	22	29	7
NIJ	742	74	75	1
OJJDP	850	85	152	67
OVC	462	46	84	38
SMART	136	14	15	1
OJP Total	6,102	610	781	171

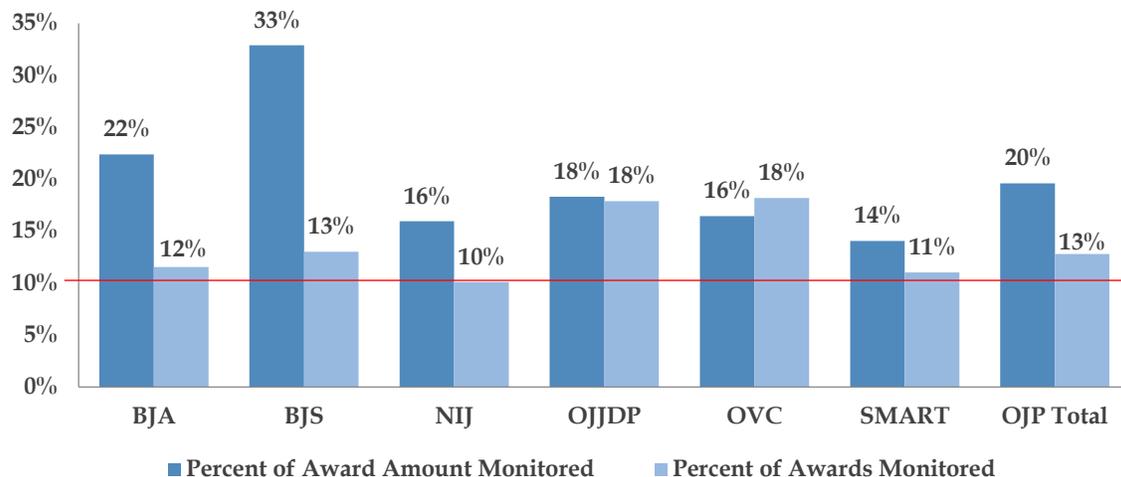
*The required monitoring level for the number of grants is 10% of the number of open, active grants each year for all program offices except BJA, for which the required monitoring threshold is 5%.

Figure 8 illustrates the percent of total awards and total award amount monitored by OJP program offices in FY 2015. The red line denotes the 10% required threshold for OJP.



FIGURE 8

FY 2015 percentage of OJP's in-depth programmatic monitoring of total number of grants and total award amount, by program office



3.4.2 Fiscal Year Comparison of Completed In-Depth Monitoring

Section Highlight

OJP's FY 2015 completed monitoring was a 14% decrease in the award amount monitored and a 20% increase in the number of awards monitored in FY 2014.

OAAM compares the amount of monitoring completed by OJP program offices against the open, active award totals across fiscal years as a way to gauge how monitoring levels have changed over time.

In FY 2015, OJP's completed monitoring represented a 14% decrease in the award amount monitored and a 20% increase in the number of awards monitored from FY 2014. Table 19 compares these award amounts and number of grants monitored by OJP across fiscal years.

Table 19 provides a detailed look at the number of grants each OJP program office has monitored compared to their open, active grants. OVC and OJJDP had the highest percent of grants monitored of all OJP program offices in FY 2015 at 18% each. All program offices increased the percent of grants monitored from FY 2014, with the exception of BJS and SMART, which stayed the same and decreased by 1 percent respectively.



TABLE 19
Program Office Detail Monitoring by Number of Grants since FY 2012

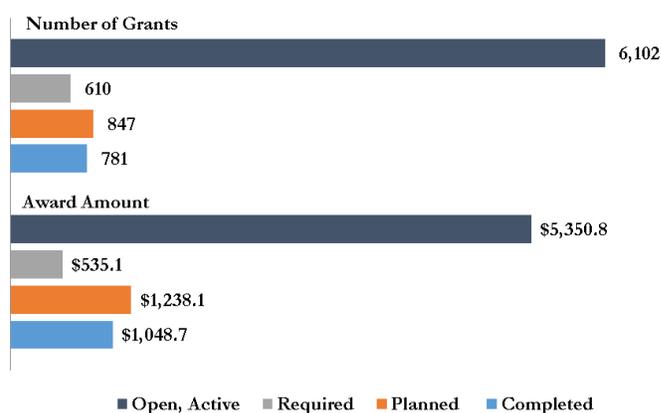
	FY 2012		FY 2013		FY 2014		FY 2015	
	Grants Monitored	Pct. of Total						
BJA	553	6%	448	5%	316	7%	426	12%
BJS	31	13%	30	12%	32	13%	29	13%
NIJ	125	12%	98	10%	81	10%*	75	10%
OJJDP	360	20%	139	10%	138	14%	152	18%
OVC	131	23%	121	26%	69	15%	84	18%
SMART	14	10%	15	11%	16	12%	15	11%
OJP Total	1,214	9%	851	7%	652	9%	781	13%

* NIJ fell short of its monitoring requirement by 2 grants in FY 2014.

At the beginning of each quarter, grant managers are asked to re-evaluate and update their plan as the priorities and workloads change. OAAM tracks each office’s programmatic monitoring levels to gauge adherence to the monitoring plans established at the beginning of each fiscal year. During the FY 2015 initial decision period, OJP planned to monitor 847 awards totaling \$1.2 billion and completed in-depth monitoring of 781 grants worth \$1.0 billion, 8% fewer grants and 15% less in award amount than originally planned.

Figure 9 illustrates the award amount and number of grants required, planned, and completed to reach OJP’s monitoring requirements for FY 2015.

FIGURE 9
FY 2015 OJP open, required, planned, and completed programmatic in-depth monitoring, by number of grants and award amount (in millions)



It is important to identify and record the grants that will be monitored in the OJP GAT as these are subsequently included in the DOJ-wide plan, which allows for better planning, coordination, and collaboration across program offices and DOJ components. Equally important is holding grant managers accountable for their monitoring plans, to ensure that grants are not removed from the plan without sound reasoning.

Over the course of the fiscal year, because grants were added and removed from the plan as priorities shifted and areas of risk were identified or mitigated, OJP grant managers selected 1,072 grants for in-depth monitoring. Among the grants selected in the OJP GAT, 748 (70%) were monitored and 324 (30%) of those selected were not monitored in FY 2015. For the grants not monitored, 208 were changed to a “No” decision in the OJP GAT,



reflecting that many grant managers' use of the tool to update and report their new decisions as changes arise. For the remaining 116 that were selected but not monitored, the decision to not monitor was never updated in the OJP GAT. Finally, an additional 33 grants (4% of those monitored) were monitored during FY 2015, which program offices did not identify for monitoring in the OJP GAT. These grants were not captured in the DOJ monitoring plan which is updated quarterly.

3.4.3 Completed In-Depth Monitoring by Type

The EPDR process was established in FY 2011 as a remote in-depth monitoring alternative to address the significant reduction of travel funds provided in the FY 2011 Continuing Resolution. In addition, in FY 2011, MOSVs were created as a way to more efficiently monitor a larger number of grants with fewer resources at the grantee site, also allowing for the opportunity to identify systemic issues that may be affecting grants across DOJ.

In FY 2015, 31% (239 grants) of the 781 OJP grants programmatically monitored were monitored through EPDRs. This figure represents a 38% decrease in the number of grants monitored through EPDR from FY 2014 to FY 2015. There was also a 96% increase in the number of grants monitored through site visits from FY 2014 to FY 2015.

TABLE 20

FY 2015 OJP completed programmatic in-depth monitoring by type

	Number of Grants	% of Number of Grants	Award Amount (in millions)	% of Award Amount
OJP				
EPDR	239	31%	\$147.0	14%
On-site Monitoring	481	62%	\$776.6	74%
MOSV - EPDR	1	>1%	\$2.6	>1%
MOSV - On-Site	60	8%	\$122.6	12%

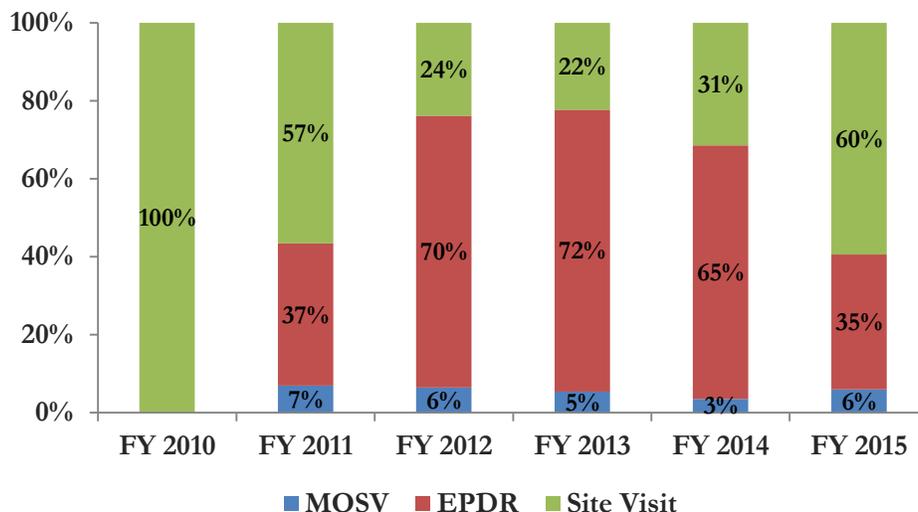
Over the four fiscal years from FY 2010 to FY 2014, OJP's on-site monitoring decreased from 1,447 awards receiving on-site monitoring in FY 2010 to 245 in FY 2014 (an 87% decrease). However, FY 2015 saw a reversal in this trend, with an increase to 481 awards receiving on-site monitoring. Figure 10 displays the shift from traditional on-site monitoring to EPDRs and MOSVs by OJP until FY 2013 and then the shift back towards on-site monitoring in FY 2014 and FY 2015, as represented by submitted monitoring packages⁶.

⁶ As part of the post monitoring activities, grants managers must complete and submit a monitoring package that consists of a report (submitted internally) and post-monitoring letter to the grantee.



FIGURE 10

Type of in-depth programmatic monitoring completed by OJP in FY 2010-2015, by percentage of monitoring packages



3.4.4 Quarterly In-Depth Programmatic Monitoring Completed

Section Highlight
 OJP has made progress towards its goal to conduct monitoring earlier in the fiscal year. FY 2015 Q1 saw a higher percentage of monitoring than the first quarter of the past four fiscal years.

The OJP program offices complete in-depth monitoring throughout the fiscal year. OAAM encourages program offices to conduct a greater percentage of their monitoring early in the fiscal year so that potential problems can be identified and risk mitigated early in the grant cycle. Figure 11 shows the number and dollar amount of awards monitored in each quarter of FY 2015. OJP program offices completed the least amount of monitoring in Q1 and the largest portion in Q3.

Because each program office has different schedules and timelines for their various roles and duties, the timing of monitoring naturally varies. It is therefore particularly important for program offices to coordinate among themselves at the beginning of the year during the initial monitoring plan period to mitigate the potential burden on any grantee selected for monitoring by more than one office.

FIGURE 11

FY 2015 OJP award amount (in millions) and number of grants programatically monitored, by quarter

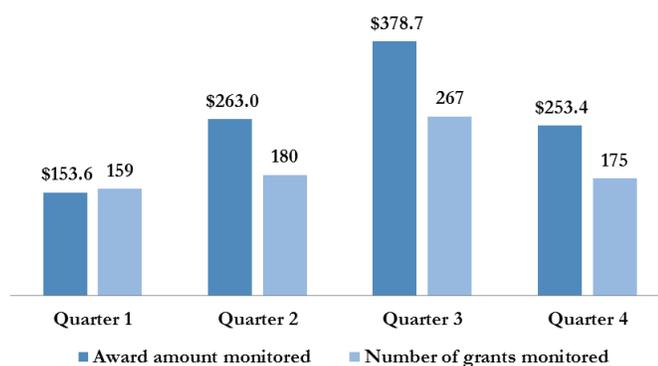
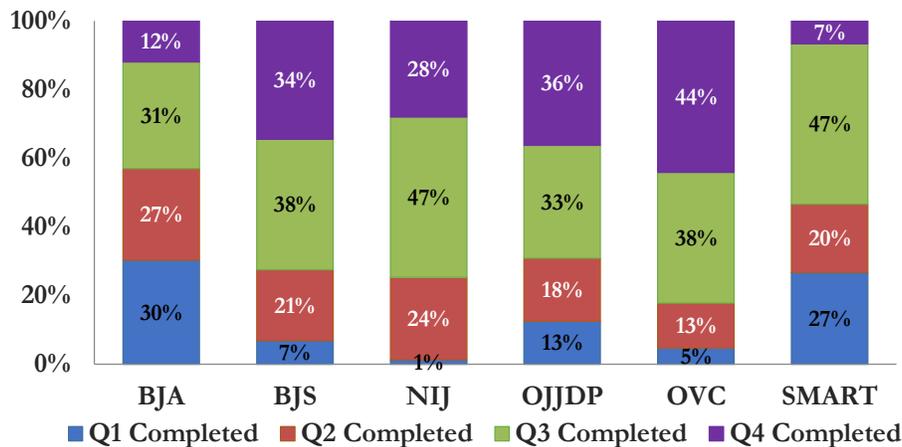




Figure 12 shows the quarterly monitoring percentages for each of the OJP program offices. BJA completed the highest percentage of monitoring during Q1 and Q3. BJS, NIJ, and SMART completed the largest percentage of their monitoring in Q3. OJJDP and OVC concentrated their monitoring during Q4.

FIGURE 12

FY 2015 percent of total number of grants programmatically monitored each quarter, by OJP program office*



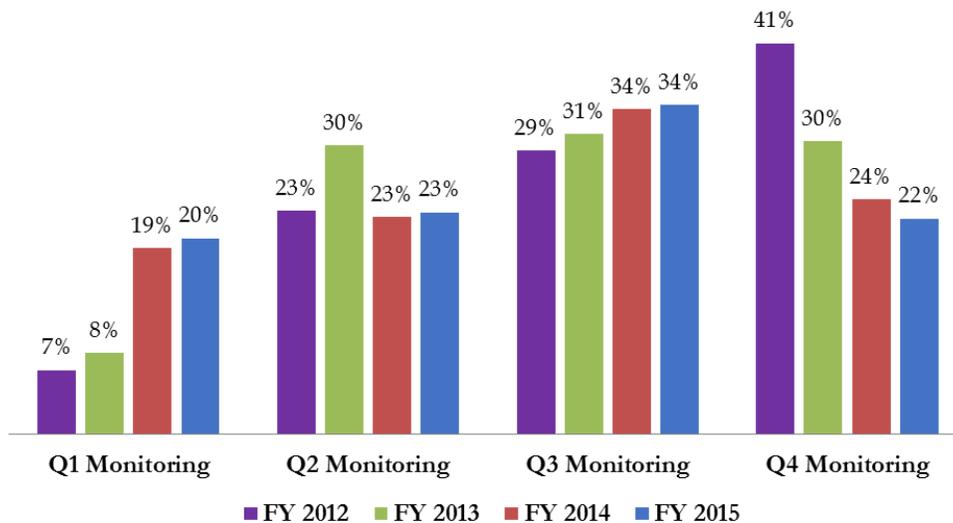
*The sum of the program office percentages do not total 100% due to rounding.

In FY 2015, OJP showed indications of departing from the overall trend of low monitoring in Q1, with the majority of monitoring taking place in the second half of the fiscal year. OJP completed a higher percentage of monitoring in the first quarter than the previous four years and a lower level of monitoring in Q4 than it has in the past four years, indicating OJP's progress towards its goal to conduct monitoring activities earlier in the fiscal year. There was no change in monitoring percentages in Q2 and Q3 from FY 2014.



FIGURE 13

OJP quarterly monitoring past four fiscal years, by percent of awards monitored



*The sum of the program office percentages do not total 100% due to rounding.

3.5 In-Depth Monitoring Package Submission/Approval Delinquencies

OJP In-Depth Monitoring Documentation Policy

OJP policy states that grant managers submit, and first-line supervisors (FLS) approve, in GMS, a site visit/enhanced programmatic desk review (monitoring) package, which consists of a report, completed checklist, supporting documentation and a post-monitoring letter. Monitoring packages must be submitted and approved within 45 days of the review, as grantees do not receive official notification of the results of the review until the package is approved in GMS.

Section Highlight

In FY 2015, 30% of all OJP programmatic monitoring packages were submitted and/or approved after the 45-day deadline.

In FY 2015, 30% of all OJP programmatic monitoring packages were submitted and/or approved after the 45-day deadline. This is a decrease from 2014 when the delinquency rate was 51%. OJJDP (55%) had the highest percentage of late packages. Among the 137 delinquent packages, 89% were submitted by the grant manager to the first-line supervisor (FLS) after the 45-day deadline. The remaining 15 packages were submitted to the FLS within 45 days of the review end date, but were approved after the 45-day deadline. However, 9 (60%) of these packages were submitted on the 40th day or later. On average, across OJP program offices, it takes 43 days from the end of the site visit or EPDR to the grant manager’s submission and 3 days from grant manager submission to FLS approval. Table 21 displays the distribution of monitoring package delinquencies.



TABLE 21

FY 2015 OJP number of delinquent monitoring packages, by program office

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Package Delinquency							
Total number of completed monitoring packages	258	16	49	82	40	12	457
Total number of delinquent monitoring packages	51	5	19	45	15	2	137
Percent of delinquent monitoring packages	20%	31%	39%	55%	38%	17%	30%
Role Duration							
Number of packages with grant manager >45 days	43	5	17	44	11	2	122
Number of packages submitted to FLS but not approved within 45 days	8	0	2	1	4	0	15

Table 22 displays the number of days delinquent monitoring packages were submitted after the 45-day deadline. Of the 137 delinquent packages, 70 (51%) were submitted within 2 weeks after the 45-day deadline. Five packages were submitted 6 months after the 45-day deadline.

TABLE 22

FY 2015 range of submission (measured from 45-day timeframe) for delinquent monitoring packages, by program office

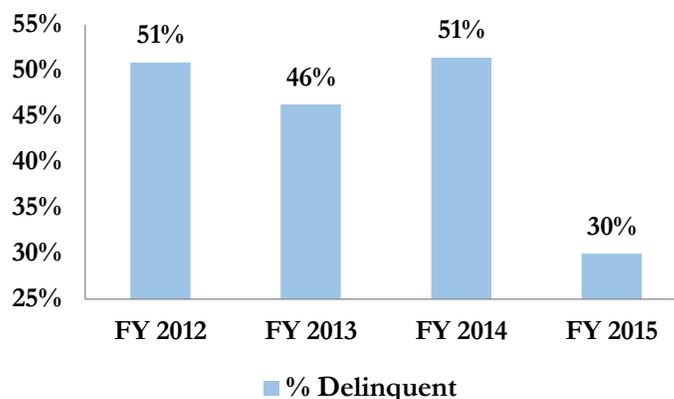
	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Less than 2 weeks	36	4	4	24	1	1	70
2 weeks to 1 month	13	1	7	9	1	1	32
1-3 months	2	0	4	5	7	0	18
3-6 months	0	0	2	5	5	0	12
6-12 months	0	0	2	2	1	0	5
Total of Delinquent Packages	51	5	19	45	15	2	137

Figure 14 illustrates the trend in delinquent monitoring packages over the past four fiscal years. Despite the overall number of grant packages submitted decreasing (29% since 2012), the proportion of delinquent monitoring packages has remained fairly constant, comprising of about half of submitted packages.



FIGURE 14

OJP percent of delinquent monitoring packages from FY 2012 to FY 2015



3.6 Issues for Resolution

Section Highlight

OJP grant managers identified issues for resolution for 16% of the total number of grants monitored in FY 2015.

After in-depth programmatic monitoring is conducted, OJP grant managers must record issues for resolution—any issues requiring corrective action on the part of the grantee—in GMS. These issues are tracked in GMS until they are resolved by the grantee. Table 23 shows the number of OJP grants with issues for resolution (each grant can have multiple issues) and their respective program offices. Grant managers identified issues for resolution for 16% of the total number of grants monitored. OVC

found the highest percent of grants with issues identified (43%), while BJS and SMART did not record any issues for resolution for their monitored grants⁷.

TABLE 23

FY 2015 OJP grants with issues for resolution, by program office

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Total of Grants Monitored	426	29	75	152	84	15	781
Number of grants monitored with issues for resolution	65	0	21	6	36	0	128
Percent of grants monitored with issues for resolution	15%	0%	28%	4%	43%	0%	16%
Total number of issues for resolution identified for monitored grants	134	0	39	5	34	0	212

⁷ This data is not indicative that OVC grants have more issues to address than other programs. 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.



Figure 15 illustrates OJP program offices' issues for resolution reporting over the last four fiscal years by the total number of issues identified and the number of grants with issues for resolution against the total number of grants monitored each fiscal year.

FIGURE 15

Issues for resolution identified versus number of grants monitored in FY 2012 to FY 2015

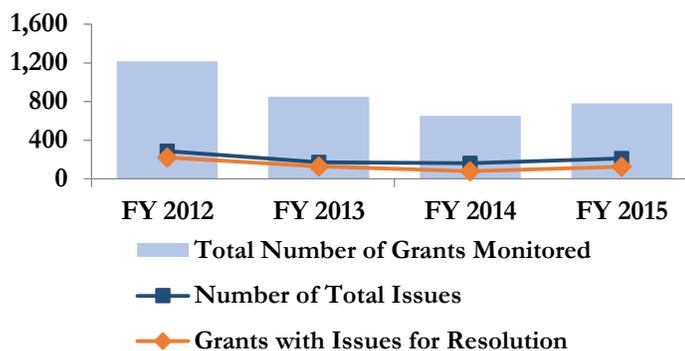


Table 24 illustrates the trend in reporting of issues for resolution over the past four fiscal years by program office. Overall, OJP has seen a decline in the percent of grants with issues identified; however, there was a 4% point increase from FY 2014 to FY 2015. BJA had the most consistent percent of issues identified over the past several years, compared to the other OJP's program offices. OVC and NIJ were the only offices that saw an increase in issues identified over the past several years. BJS, OJJDP, and SMART have reported issues identified in averages of less than 10% of grants since 2013, with OJJDP experiencing a steep decline from FY 2012.

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 grantees' implementation of programs and assessing whether the purpose, objectives, and timeliness of the grant are being met.

TABLE 24
Percent of grants with issues for resolution identified by OJP program offices from FY 2012 to FY 2015

	FY 2012	FY 2013	FY 2014	FY 2015
BJA	15%	13%	16%	15%
BJS	0%	3%	0%	0%
NIJ	8%	14%	7%	28%
OJJDP	29%	4%	6%	4%
OVC	17%	44%	26%	43%
SMART	21%	0%	0%	0%
Total	18%	15%	12%	16%

Table 25 categorizes issues for resolution identified in FY 2015 under the three types of reviews. Financial issues accounted for 39% of all identified issues for resolution, while 37% were administrative issues, and 24% were programmatic issues. There was a decrease in the percent of financial issues found (from 46% in 2014 to 39% in 2015) and increase in the percent of administrative issues found (from 31% to 37% in 2015).



OAAM reviewed the documented issues for resolution to better understand how they were being identified and recorded by grant managers. Of the 115 grant managers who completed in-depth monitoring activities in FY 2015, 43 (37%) reported issues for resolution in GMS. This is an increase from the past year when 26% of grant manager identified issues for resolution, but a decrease from FY 2013 when 44% identified issues for resolution. OAAM will continue to review how grant managers are identifying and recording issues for resolution throughout FY 2016 and identify areas for training or technical assistance to OJP grant managers.

TABLE 25

FY 2015 OJP grants with issues for resolution, by type of issue and program office

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Number of grants with financial issues	31	0	14	3	13	0	61
Number of grants with administrative issues	38	0	11	2	7	0	58
Number of grants with programmatic issues	28	0	5	1	25	0	59
Total number of monitored grants with issues for resolution	65	0	21	6	36	0	128



4. The COPS Office Monitoring

4.1 The COPS Office Grant Portfolio Demographics

The COPS Office had 1,870 open, active grants totaling \$1,310.2 across 1,169 grantees at the start of FY 2015.

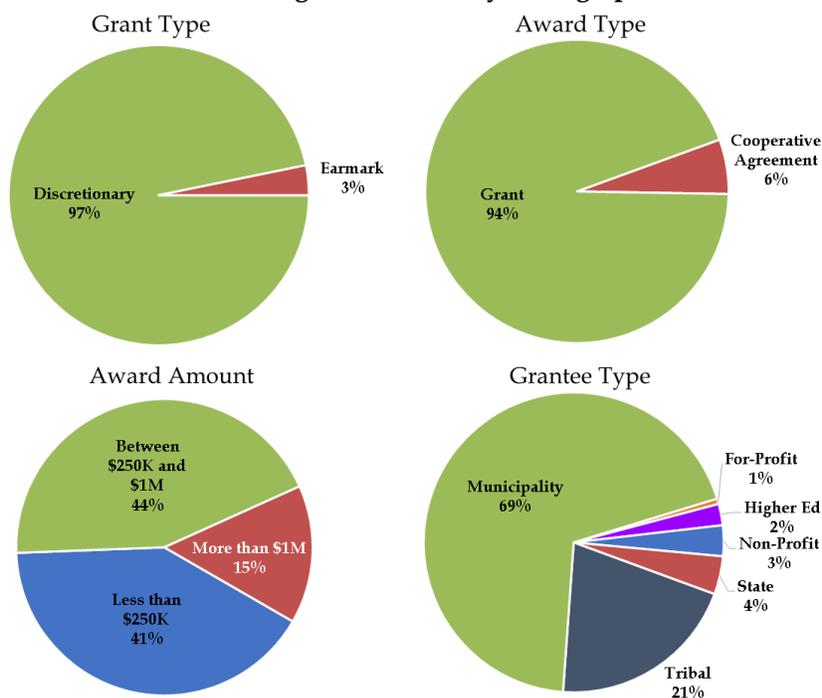
Figure 16 depicts the distribution of grants in the COPS Office’s portfolio across the key demographic characteristics of award type, grantee type, and award amount. The COPS Office grant portfolio’s award type breakdown remained fairly constant from FY 2014 to FY 2015 with a majority of discretionary grants (97%) and a small number of earmarks (3%). The COPS Office grant portfolio was largely made up of grants (94%) but also included cooperative agreements (6%).

While municipalities and tribal grantees remained the top two grantee types from 2014 to FY 2015, the proportion of grants awarded to each shifted. The proportion of awards to municipalities declined from 74% to 69% and tribal grantees increased from 16% to 21%.

The COPS Office’s grant portfolio also shifted slightly to include a higher percentage of grants between \$250,000 and \$1 million, increasing from 42% of the grant portfolio in FY 2014 to 44% in FY 2015. The percentage of grants less than \$250,000 and over \$1.0 million in the portfolio decreased by a percentage point each to 41% and 15%, respectively.

FIGURE 16

FY 2015 COPS distribution of grants across key demographic characteristics





4.2 Monitoring Plan and Priorities

At the end of the FY 2015 monitoring decision period, the COPS Office planned to conduct in-depth monitoring for 89 grants or \$137.4 M (4.8% and 10.5%, respectively, of the COPS Office portfolio). Of the grants chosen for in-depth monitoring, 54% were site visits, 35% were Enhanced Office Based Grant Reviews (EOBGRs), and 11% were local site visits.

4.3 Completed Monitoring

4.3.1 FY 2015 Required and Completed Programmatic Monitoring

Statutory Monitoring Requirement

Each fiscal year, the COPS Office is required to fulfill a statutory requirement to programmatic monitor 10% of the total open, active award amount.

In FY 2015, the COPS Office completed in-depth monitoring reviews (site visits and EOBGRs) for 83 grants totaling \$131.8 million. The COPS Office has exceeded its statutory requirement each fiscal year since the inception of the statute in 2007. In FY 2015, the COPS Office continued to exceed its 10% requirement by monitoring 10.1% of its open, active award amount. Table 26 compares the COPS Office completed monitoring to its monitoring requirement and monitoring plan.

TABLE 26

FY 2015 the COPS Office open, required, planned, and completed programmatic in-depth monitoring, by number of grants and award amount (in millions)

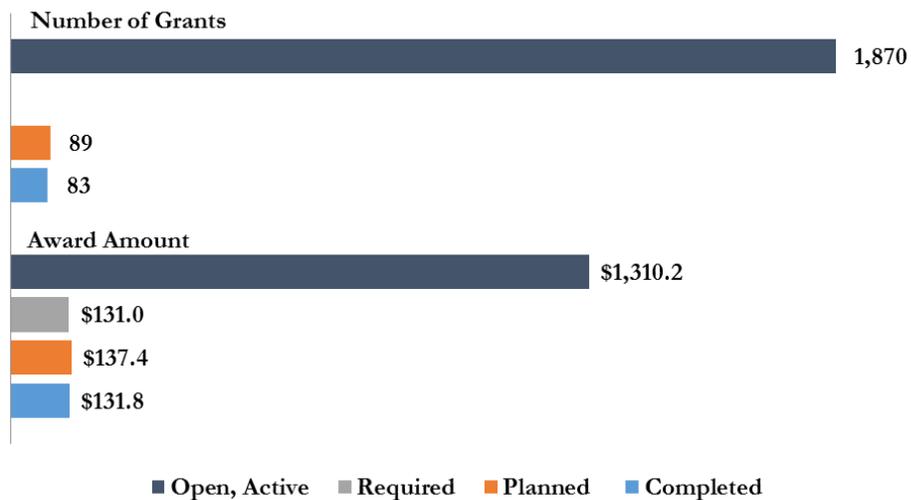
	Number of Grants	Award Amounts
COPS Office		
Open, Active Grants	1,870	\$1,310.2
Monitoring Required	NA	\$131.0
Monitoring Planned	89	\$137.4
Monitoring Completed	83	\$131.8
Amount Exceeding Requirement	NA	\$0.8

During the FY 2015 initial decision period, the COPS Office planned to monitor 89 awards. However, 83 grants had in-depth monitoring completed, 7% fewer grants than originally planned. Figure 17 illustrates the award amount and number of grants required, planned, and completed to reach the COPS Office monitoring requirements for FY 2015.



FIGURE 17

FY 2015 the COPS Office open, required, planned, and completed programmatic in-depth monitoring, by number of grants and award amount (in millions)



The COPS Office does not have a monitoring requirement for the number of grants.

4.3.2 Fiscal Year Comparison of Completed In-Depth Monitoring

Section Highlight
 The COPS Office’s FY 2015 completed monitoring was a 32% decrease in the award amount monitored but a 47% decrease in the number of awards monitored from FY 2014.

OAAM compares the amount of monitoring completed by the COPS Office against the open, active award totals across fiscal years as a way to gauge how monitoring levels have changed over time.

In FY 2015, the COPS Office’s completed monitoring represented a 32% decrease in the award amount monitored and a 47% decrease in the number of awards monitored from FY 2014. Table 27 compares these award amounts and number of grants monitored by the COPS Office across fiscal years.



TABLE 27

Comparison of FY 2012-2015 completed programmatic monitoring for the COPS Office, by award amount (in millions) and number of grants

	FY 2012	FY 2013	FY 2014	FY 2015
Award Amount				
Total award amount of open, active grants	\$2,535.1	\$2,264.8	\$1,880.9	\$1,310.2
Award amount monitored	\$270.2	\$228.3	\$194.4	\$131.8
Percent of open, active award amount monitored	11%	10%	10%	10%
Number of Grants				
Total of open, active grants	4,140	3,335	2,459	1,870
Number of grants monitored	253	149	157	83
Percent of open, active grants monitored	6%	4%	6%	4%

4.2.3 Completed In-Depth Monitoring by Type

In FY 2014, the COPS Office began using Enhanced Office Based Grant Reviews (EOBGRs) as a remote monitoring alternative to address a reduction in travel funds. An EOBGR is a monitoring activity during which the Grant Monitoring Specialist performs a compliance and administrative review of a grant without traveling to the grantee’s site. In FY 2015, 66% (55 grants) of the 83 COPS Office grants programatically monitored were monitored through site visits while 34% (28 grants) were monitored through EOBGRs. The proportion of monitoring completed through EOBGRs increased from FY 2014 when 22% of monitoring, as measured by number of grants, was conducted through EOBGRs.

TABLE 28

FY 2015 the COPS Office completed programmatic in-depth monitoring by type

	Number of Grants	% of Number of Grants Monitored	Award Amount (in millions)	% of Award Amount Monitored
COPS				
EOBGR	28	34%	\$34.9	26%
Site Visits	49	59%	\$84.8	64%
Local Site Visits	6	7%	\$12.1	9%

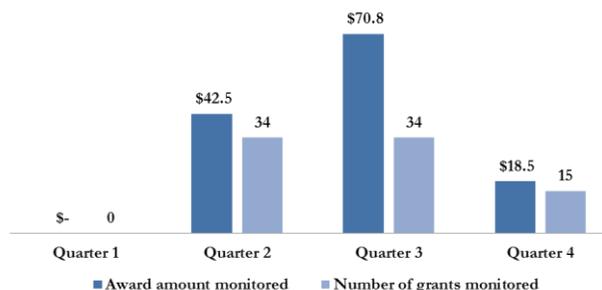


4.3.4 Quarterly In-Depth Programmatic Monitoring Completed

The COPS Office completes in-depth monitoring throughout the fiscal year. OAAM encourages the COPS Office to conduct a greater percentage of its monitoring early in the fiscal year so that potential problems can be identified and risk mitigated early in the grant cycle. Figure 18 shows the number and dollar amount of awards monitored in each quarter of FY 2015. The COPS Office completed the majority of its monitoring in Q3 in terms of dollar amount monitored (54%) and equal amounts of monitoring in Q2 and Q3 in terms of number of awards (41% each). The COPS Office did not complete any monitoring in Q1. In Q4, the COPS Office completed 18% of its monitoring as measured by number of grants and 14% of its monitoring as measured by award amount.

FIGURE 18

FY 2015 COPS Office award amount (in millions) and number of grants programmatically monitored, by quarter



4.4 Issues for Resolution

The COPS Office documents issues for resolution identified during in-depth programmatic monitoring. These issues and their associated corrective actions are tracked until they are resolved by the grantee. Table 29 shows the number of COPS Office grants with issues for resolution (each grant can have multiple issues) identified in FY 2015. Grant Monitoring Specialists identified issues for resolution for 44% of the total number of grants monitored.

TABLE 29

FY 2015 COPS Office grants with issues for resolution

	Totals
Total of Grants Monitored	83
Number of grants monitored with issues for resolution	72
Percent of grants monitored with issues for resolution	87%
Total number of issues for resolution identified for monitored grants	48



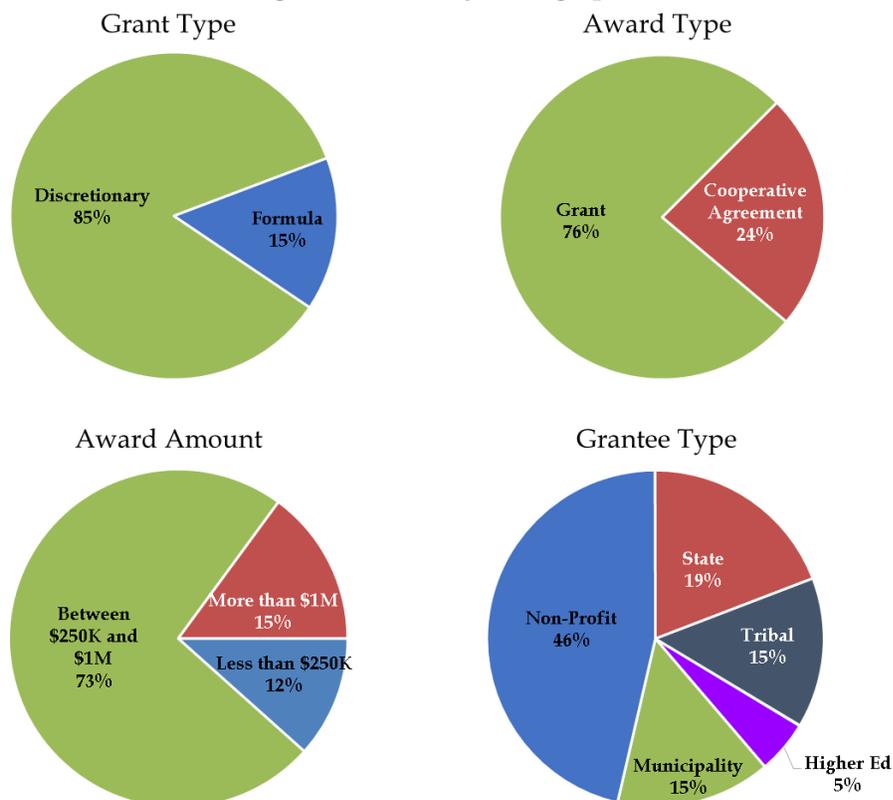
5. OVW Monitoring

5.1 OVW Grants Portfolio Demographics

OVW had 1,849 open, active grants totaling \$1,297.6 across 1,160 grantees at the start of FY 2015. Figure 19 depicts the distribution of grants in OVW’s portfolio across the key demographic characteristics of award type, grantee type, and award amount. In FY 2015, OVW’s grant portfolio was comprised mostly of discretionary grants (85%) with the remaining awards falling under formula grants (15%). OVW had three earmarks in FY 2015. OVW’s use of cooperative agreements as an award type increased from 20% in FY 2014 to 24% in FY 2015. The majority of OVW’s grants had an award amount between \$250,000 and \$1.0 million (73%). Of the remaining grants, a higher proportion (15%) had an award amount greater than \$1.0 million than those with an award amount less than \$250,000 (12%). In FY 2015 almost half of OVW’s grantees were non-profits (46%), with the other half was comprised mostly of states (19%), municipalities (15%) and tribal grantees (14%). OVW’s FY 2015 grant portfolio had similar characteristics as its FY 2014 grant portfolio.

FIGURE 19

FY 2015 OVW distribution of grants across key demographic characteristics





5.2 Monitoring Plan and Priorities

OVW conducts a risk assessment between April 1st and July 31st on all of open, active grants to determine a priority level and therefore the monitoring activities to take place for each grant. The OVW GAT uses 13 standard elements to evaluate risk. See Appendix E for a list of the criteria.

At the end of the FY 2015 monitoring decision period, OVW program specialists had planned to conduct in-depth monitoring for 154 grants, equaling \$115.1 million.

5.3 Completed Monitoring

5.3.1 FY 2015 Required and Completed Programmatic Monitoring

Internal OVW Monitoring Requirements

While OVW does not have a statutory requirement, it adheres to several grant monitoring standards, including conducting on-site monitoring on at least 10% of its grantees, including 50% of its grantees on the DOJ high risk list, and 50% of a program's highest risk grantees. In addition, it aims to perform office based reviews on at least 5% of grantees each year.

Section Highlight

In FY 2015, OVW program specialists completed monitoring of 73 grantees (6%), falling short of its 10%.

In order to meet its monitoring target, OVW program specialists were required to conduct 116 site visits or office based reviews during FY 2015. At the end of the FY 2015 monitoring decision period, OVW program specialists had planned to conduct in-depth monitoring for 154 grants for 142 grantees. By the end of FY 2015, OVW program specialists completed 79 site visits or office based reviews for 77 grants⁸, covering 72 grantees (6% of its grantees). OVW fell short of its 10% goal by almost 4 percentage points. However, this shortfall is mitigated by the increase in monitoring of OVW awards by OJP's OCFO. OVW experienced a decrease in monitoring from FY 2014, when 98 site visits were conducted, covering 8% of open, active grantees.

5.3.2 Completed In-Depth Monitoring by Type

OVW monitors its grants through site visits and office based reviews. Of the 72 grantees monitored, 19 (26%) were monitored through office based reviews, exceeding the internal target of 5%.

⁸ Occasionally, grants are monitored multiple times in a year. In FY2015, OVW monitored four grants more than once.



TABLE 30

FY 2015 OVW completed programmatic in-depth monitoring by type

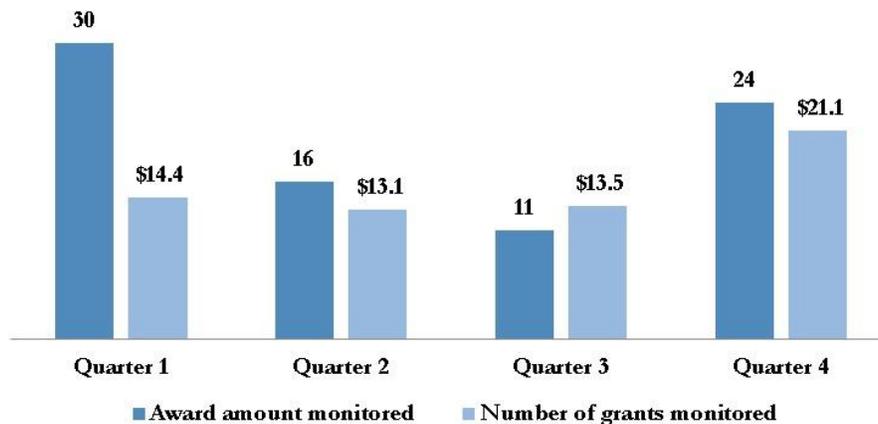
	Number of Grantees	% of Grantees Monitored
OVW		
Office Based Reviews	19	26%
Site Visits	53	74%

5.3.3 Quarterly In-Depth Programmatic Monitoring Completed

OVW completes in-depth monitoring throughout the fiscal year. OAAM encourages program offices to conduct monitoring early in the fiscal year so that potential problems can be identified and risk mitigated early in the grant cycle. Figure 20 shows the number and dollar amount of awards monitored in each quarter of FY 2015. OVW completed the majority of its monitoring in Q1 in terms of number of awards monitored and in Q4 in terms of dollar amount monitored. OVW monitored the most grantees (26) in Q1 (35% of total grantees monitored).

FIGURE 20

FY 2015 OVW award amount (in millions) and number of grants programmatically monitored, by quarter⁹



⁹ Four grants are counted for multiple site visits across quarters. It is not uncommon for multiple site visits to take place in a fiscal year for a technical assistance award.



6. OCFO Financial Monitoring

6.1 Monitoring Plan and Priorities

6.1.1 On-Site Financial Monitoring Decisions

The OCFO uses the OJP GAT results and other selection factors to select grants for financial monitoring. In FY 2015, of the 9,821 open, active grants totaling \$8.0 billion in DOJ at the start of the fiscal year, OCFO planned to conduct on-site financial monitoring on 71 grantees, covering 466 grants, or \$893.6 million. Of the 71 grantees in OCFO's on-site monitoring plan, 50 were also included in the programmatic monitoring plans of the OJP program offices and OVW, providing an opportunity to conduct joint monitoring either through a MOSV or a joint site visit.

6.2 Completed Monitoring

6.2.1 FY 2015 Completed On-Site Financial Monitoring

Section Highlight

During FY 2015, OCFO conducted 75 on-site reviews of 482 DOJ grants, totaling \$950.5 million.

During FY 2015, OCFO's Grants Financial Management Division conducted 75 on-site reviews of 482 DOJ grants, totaling \$950.5 million. As depicted by Tables 31 and 32, OCFO exceeded its plan by 16 grants or \$56.9 million. OCFO monitored 1% more grants than planned for OVW, 4% more for OJP, and 5% for the COPS Office.

TABLE 31

FY 2015 DOJ open, planned, and completed financial on-site monitoring, by award amount (in millions)

	Open, Active Award Amount	Monitoring Planned	Monitoring Completed	Difference from Plan
OJP				
BJA	\$2,076.6	\$231.6	\$243.3	\$11.7
BJS	\$195.1	\$38.9	\$41.9	\$3.0
NIJ	\$442.3	\$38.7	\$37.8	-\$0.9
OJJDP	\$880.2	\$57.4	\$59.6	\$2.2
OVC	\$1,715.6	\$321.3	\$361.8	\$40.5
SMART	\$41.0	\$1.1	\$1.2	\$0.1
OJP Total	\$5,350.8	\$689.0	\$745.5	\$56.5
COPS	\$1,310.2	\$78.8	\$79.0	\$0.2
OVW	\$1,297.6	\$125.6	\$126.0	\$0.4
OCFO Total	\$7,958.6	\$893.6*	\$950.5	\$56.9

*The sum of the program office planned monitoring amounts do not equal the totals due to rounding.



TABLE 32

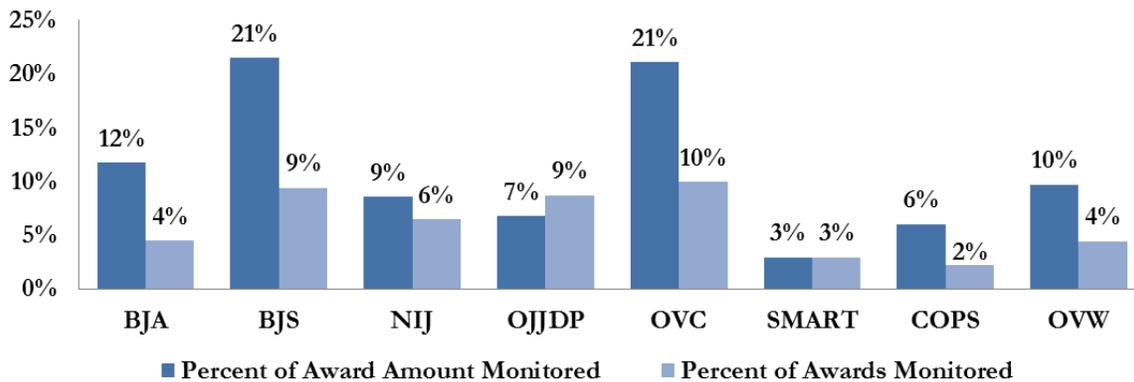
FY 2015 DOJ open, planned, and completed financial on-site monitoring, by number of grants

	Open, Active Grants	Monitoring Planned	Monitoring Completed	Difference from Plan
OJP				
BJA	3,689	170	166	-4
BJS	223	17	21	4
NIJ	742	47	48	1
OJJDP	850	70	74	4
OVC	462	38	46	8
SMART	136	4	4	0
OJP Total	6,102	346	359	13
COPS	1,870	39	41	2
OVW	1,849	81	82	1
OCFO Total	9,821	466	482	16

Figure 21 shows the proportion of the open, active grant portfolio monitored on-site by OCFO for each component and program office within OJP. OCFO monitored 5% of the open, active grants and 12% of award amount across components.

FIGURE 21

FY 2015 percentage of OCFO's on-site financial monitoring of total number of grants and total award amount, by program office





6.2.2 Fiscal Year Comparison of Completed On-Site Monitoring

When comparing FY 2015 on-site financial monitoring to FY 2014, monitoring increased overall. On-site financial monitoring of OJP grants grew 57% in number of grants and 53% in award amount. OCFO financially monitored 50% more grants and 82% more award dollars for OJP in FY 2015 than the previous year. For the COPS Office, OCFO financially monitored 20% fewer grants in FY 2015 than the previous year. However, when measured by award amount, the on-site financial monitoring increased 56%. OCFO increased financial monitoring of OVW in FY 2015 from the prior year, increasing the award amount monitored by 39% and the number of grants monitored by 71%.

TABLE 33

Comparison of FY 2013-2015 completed on-site financial monitoring by component, by award amount (in millions) and number of grants

	FY 2013	FY 2014	FY 2015
Award Amount			
OJP	\$553.1	\$496.2	\$745.5
COPS	\$68.5	\$50.7	\$79.0
OVW	\$59.3	\$73.8	\$126.0
Total	\$680.9	\$620.7	\$950.5
Number of Grants			
OJP	256	197	359
COPS	47	51	41
OVW	48	59	82
Total	351	307	482

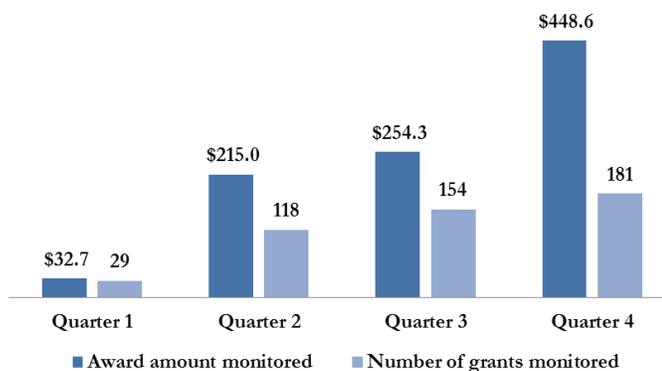
6.2.3 Quarterly On-Site Financial Monitoring Completed

OCFO conducts financial monitoring throughout the fiscal year. OCFO tracks the financial monitoring plan compared to actual financial monitoring through final closure of the financial monitoring recommendations. OCFO's revised monitoring plan is published by OAAM each quarter.

Figure 22 shows the number and dollar amount of awards that received on-site financial monitoring in each quarter of FY 2015. OCFO completed the least amount of monitoring, both in the award amount and number of grants, in Q1. The greatest amount of monitoring as measured by amount and by number of grants occurred in the fourth quarter.

FIGURE 22

FY 2015 Award amount (in millions) and number of grants receiving on-site financial monitoring, by quarter





6.3 Focused Monitoring

6.3.1 OCFO Financial Desk Reviews

In addition to on-site financial monitoring, OCFO conducts financial desk reviews on selected DOJ grants to ensure grant recipients are in compliance with grant financial and administrative requirements and are properly reporting their financial activity on the Federal Financial Reports. In FY 2015, OCFO conducted financial desk reviews on 433 (4%) of DOJ's open, active grants.

Figure 23 shows the number and dollar amount of awards OCFO conducted desk reviews on in each quarter of FY 2015. In Q4, OCFO completed the greatest amount of desk reviews as measured by number of grants, while Q3 had the greatest amount of desk reviews by award amount. The least number of grants and award amount that underwent a desk review by OCFO was in Q2.

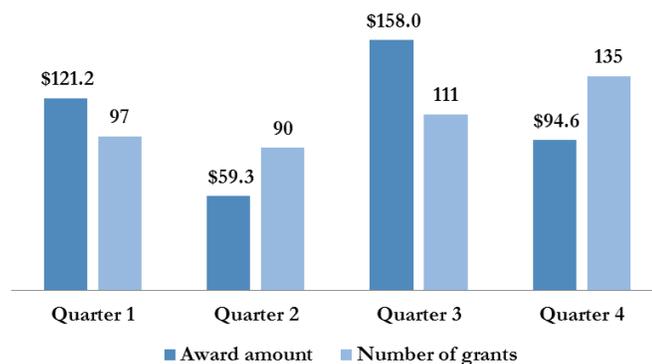
TABLE 34

FY 2015 financial desk reviews by program office

Program Office	Completed Desk Reviews
OJP	
BJA	155
BJS	3
NIJ	48
OJJDP	64
OVC	29
SMART	3
OJP Total	302
COPS	48
OVW	83
Total	433

FIGURE 23

FY 2015 OCFO desk reviews by award amount (in millions) and number of grants, by quarter



6.3.2 OCFO Financial Monitoring Top Findings

During FY 2015, of the 482 grants reviewed through on-site monitoring, 467 (97%) had at least one reportable finding issued.

The top 10 findings noted include:

1. Procedures not documented or need improvement for 487 grants (29.84%)
 - Payroll for 131 grants (8.03%)
 - Subrecipient Monitoring for 127 grants (7.78%)



- Accounting for 89 grants (5.45%)
 - Procurement for 66 grants (4.04%)
 - Conference for 36 grants (2.21%)
 - Inventory for 32 grants (1.96%)
 - Internal Controls for six grants (0.37%)
2. Federal Funding Accountability and Transparency Act (FFATA) Reporting Requirements not met for 115 grants (7.05%)
 3. Unauthorized Costs for 76 grants (4.66%)
 4. Federal Financial Reports (FFR) do not reconcile to Grantee's Accounting Records for 64 grants (3.92%)
 5. Indirect Costs charged improperly for 55 grants (3.37%)
 6. Budget category expenditures not properly tracked for 52 grants (3.19%)
 7. Unallowable costs for 42 grants (2.57%)
 8. Unsupported costs for 39 grants (2.39%)
 9. Indirect costs not reported on the FFR for 34 grants (2.08%)
 10. Special Condition not met by grantee for 30 grants (1.84%)

In total, OCFO identified 2,123 weaknesses and \$22.64 million in questioned costs in the 915 grants reviewed. Out of the \$22.64 million in questioned costs, \$17.95 million remained open as of September 30, 2015. For the weaknesses identified, OCFO provided technical assistance to the grantees, determined the reason(s) the issue was considered a weakness, and recommended solutions to correct the weaknesses. In addition, the reviewer rendered on-site interpretation of, and provided support in applying, the OJP Financial Guide and other Federal grants financial management regulations. This advice assisted grantees in developing procedures needed to correct the noted weaknesses.



7. FY 2016 Monitoring Focus Areas

In an effort to build on the FY 2015 accomplishments, continuously improve monitoring standards and procedures, and respond to issues identified throughout the year, OAAM has identified several areas of improvement of monitoring activities for FY 2016.

- ◆ As part of the Justice Grants Services Network (GrantsNet), OAAM, in coordination with OVW, the COPS Office, and OCFO, enhanced the OJP GAT to allow for a shared common functionality, achieve efficiencies and align business processes. In FY 2016, the DOJ GAT was used for the development of the FY 2016 DOJ Monitoring Plan. The new DOJ GAT provides a common framework and methodology, and platform for systematically and objectively assessing risk associated with DOJ's grants and/or grantees. Program offices use this information to assist in planning and prioritizing monitoring activities based on potential vulnerabilities. The location of data for all three components and OCFO in the DOJ GAT allows OAAM to analyze and report on data in a more efficient and timely manner.
- ◆ During FY 2016, OAAM updated the pre-award risk process using the OMB approved *Financial Management and System of Internal Controls Questionnaire*, additional data sources, and lessons learned from the first year on implementation in FY 2015. The framework from the post-award Grant Assessment Tool, data from USA Spending.gov, the Excluded Parties List, other agencies' High Risk List, DOJ's High Risk List, and unresolved audit findings, as well as the applicant's answers to the *Financial Management and System of Internal Controls Questionnaire* are used to determine a risk rating for each applicant. This process supports OJP's priority to ensure integrity in the financial and programmatic management of programs and to strengthen accountability for federal dollars by improving policies and processes that protect against waste, fraud, and abuse.
- ◆ To improve the grant monitoring process and increase compliance with monitoring polices within OJP, OAAM used the results from its Quality Review Pilot to continue the development started in FY 2015 of enhanced training, guidance, and templates on properly documenting in-depth monitoring. Content includes what constitutes sufficient and appropriate documentation to support findings, how to conduct key pieces of analysis for the financial, administrative, and programmatic reviews, and how to properly write about in-depth monitoring in the report.
- ◆ During FY 2015, OAAM conducted an analysis of how OJP program offices are identifying and resolving issues for resolution found during in-depth monitoring activities in the grant monitoring module of GMS. The study provided insights into the types of issues that program offices are identifying and the amount of time it takes issues to be resolved. OAAM will use the analysis to determine improvements to the existing processes and to provide targeted guidance for identifying, tracking and resolving issues found during site visits and EPDRs. Because all issues for resolution must be closed in order to close an award, OAAM will provide a monthly report of open issues for resolution for grants that are scheduled to close in 60 days to BPO leadership to assist with the close-out process.



Appendices

Appendix A. FY 2015 OJP Risk Criteria Breakdown

The table below details the breakdown of risk scores applied to the landscape of OJP grants during the initial risk assessment at the beginning of FY 2015. OAAM assessed 5,909 grants for FY 2015 Q1.

	Score	Number of Awards	Percent of Awards
Award Type			
Formula	0	3,270	55.34%
Discretionary	2	2,342	39.63%
Cooperative Agreement	4	232	3.93%
Earmark	4	65	1.10%
Grantee Type			
State	0	1,938	32.80%
Higher Education	2	358	6.06%
Municipality	2	2,564	43.39%
Non-Profit	2	577	9.76%
Tribal	4	371	6.28%
For-Profit	4	577	9.76%
Other	4	13	0.22%
State Administering Agency			
No	0	4,301	72.79%
Yes	2	1,608	27.21%
Award Amount*			
<\$250,000	0	3,944	66.75%
≥\$250,000 - <\$1M	2	1,539	26.05%
≥\$1M	4	426	7.21%
JAG Disparate Jurisdiction			
No	0	5,906	99.95%
Yes	4	3	0.05%
Confidential Funds			
No	0	5,834	98.73%
Yes	4	75	1.27%
Matching Funds			
No	0	5,563	94.14%
Yes	4	346	5.86%
Fiscal Integrity Review Referral			
No	0	5,909	100.00%
Yes	4	0	0.00%
Grant Has No Financial Clearances**			
No	0	5,899	99.83%
Yes	6	10	0.17%
New Grantee (Past 3 FY)			
No	0	5,642	95.48%
Yes	6	267	4.52%



	Score	Number of Awards	Percent of Awards
New Program			
No	0	5854	99.07%
Yes	4	55	0.93%
DOJ High-Risk Grantee			
No	0	5,758	97.44%
Yes	6	151	2.56%
Recovery Act Award			
No	0	5,905	99.93%
Yes	4	4	0.07%
Award Open > 4 Years			
No	0	5,752	97.34%
Yes	4	157	2.66%
Award has Unobligated Balances > 2 Years After Start Date			
No	0	5,730	96.97%
Yes	4	179	3.03%
Number of No-cost Extensions Approved			
0	0	4,388	74.26%
1-2	2	1,270	21.49%
3+	4	251	4.25%
Number of Delinquent FFRs			
0	0	4,763	80.61%
1	3	721	12.20%
2+	6	425	7.19%
Number of Delinquent Progress Reports			
0	0	5,233	88.56%
1	3	601	10.17%
2+	6	75	1.27%
Independent Audit on Record			
Yes	0	5,636	95.38%
No and total grantee funding < \$500,000	3	160	2.71%
No and total grantee funding ≥ \$500,000	6	113	1.91%
Most Recent Single Audit Opinion (FAC)			
Unqualified	0	5,539	93.74%
Qualified	3	209	3.54%
Adverse, Disclaimer, Going Concern	6	161	2.72%
Non-compliant with FFATA			
No	0	5,748	97.28%
Yes	4	161	2.72%
Active Withholding of Funds			
No	0	4,680	79.20%
Yes	4	1,229	20.80%
Program Income on Latest FFR***			
No	0	5,834	98.73%
Yes	6	75	1.27%
Potential Excess Cash***			
No	0	5,728	96.94%



	Score	Number of Awards	Percent of Awards
Yes	6	181	3.06%
Programmatic Issue for Resolution More than 1 Year Old			
No	0	5,901	99.86%
Yes	6	8	0.14%
Financial Issue for Resolution More than 1 Year Old			
No	0	5894	99.75%
Yes	6	15	0.25%
Reported Program/Grant Implementation Concerns			
No	0	5,635	95.36%
Yes, grantee is currently not implementing the program according to plan and/or is experiencing significant obstacles or delays	3	248	4.20%
Yes, grantee's activities and/or deliverables do not support project goals and objectives	6	26	0.44%
Conference Costs			
No	0	5,437	92.01%
Yes, reported potential use of conference cost funds in desk review	3	236	3.99%
Yes, Event reported in Conference Cost reporting tool	6	236	3.99%
Subawards/Subcontracts			
No	0	3,946	66.78%
Yes	2	1,963	33.22%
Current Ongoing OIG Audit			
No	0	5,873	99.39%
Yes	-1	36	0.61%
Recent Programmatic Site Visit/EPDR (Past 2 FYs)			
No	0	5,360	90.71%
Yes	-2	549	9.29%
Recent OCFO Site Visit (Past 2 FYs)			
No	0	5,687	96.24%
Yes	-2	222	3.76%
Grantee Has not Received In-Depth Monitoring in Last 4 Years (Programmatic or OCFO)			
No, or does not meet dollar/number of awards threshold	0	5,419	91.71%
Yes and \$1M-\$5M in total funds	3	234	3.96%
Yes and grantee has 5 or more active awards or greater than \$5M in total funds	6	256	4.33%

*SAAs exempted from this criteria; do not appear in totals

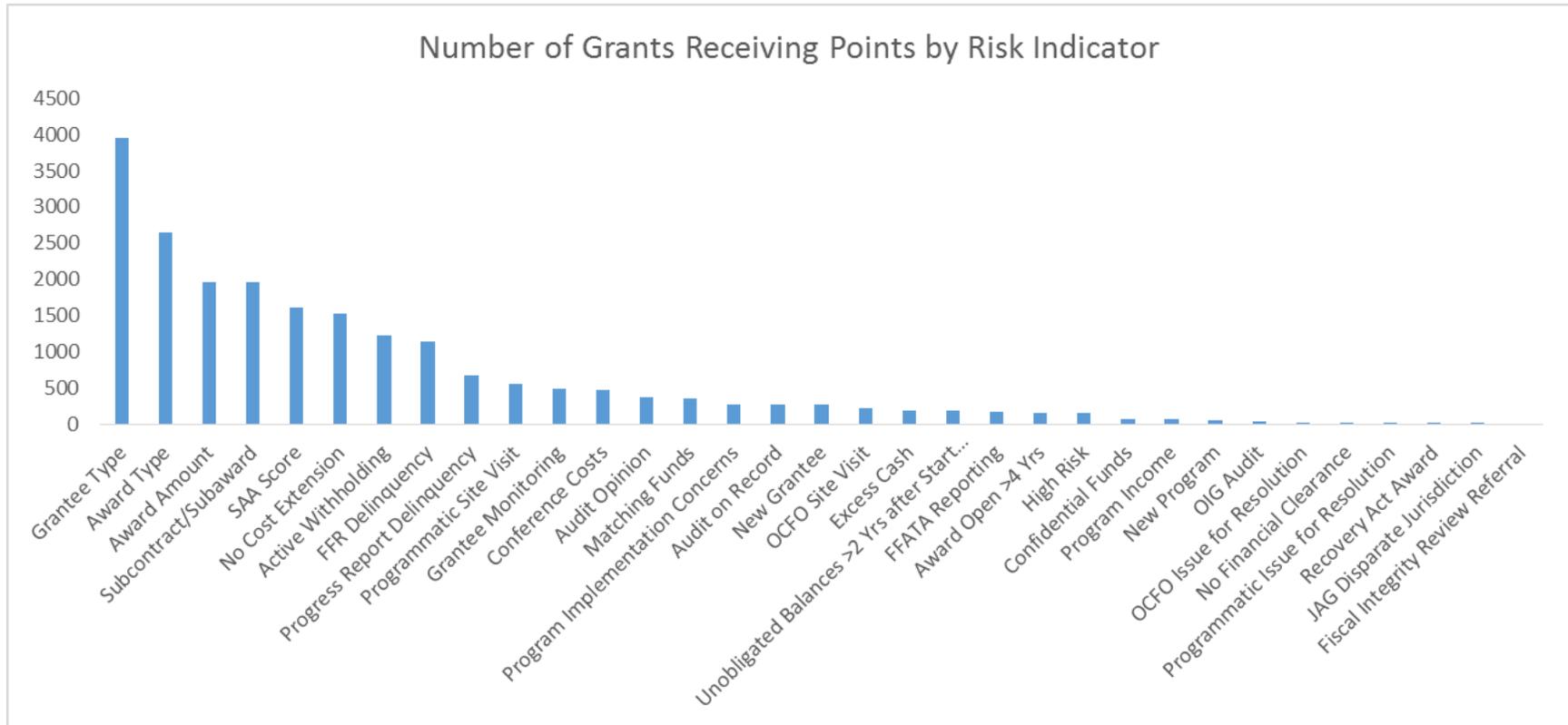
**Criteria does not apply in Q1

***JAG/JABG awards exempted from this criteria; do not appear in totals



Appendix B. Number of OJP Grants Receiving Points by Risk Indicator

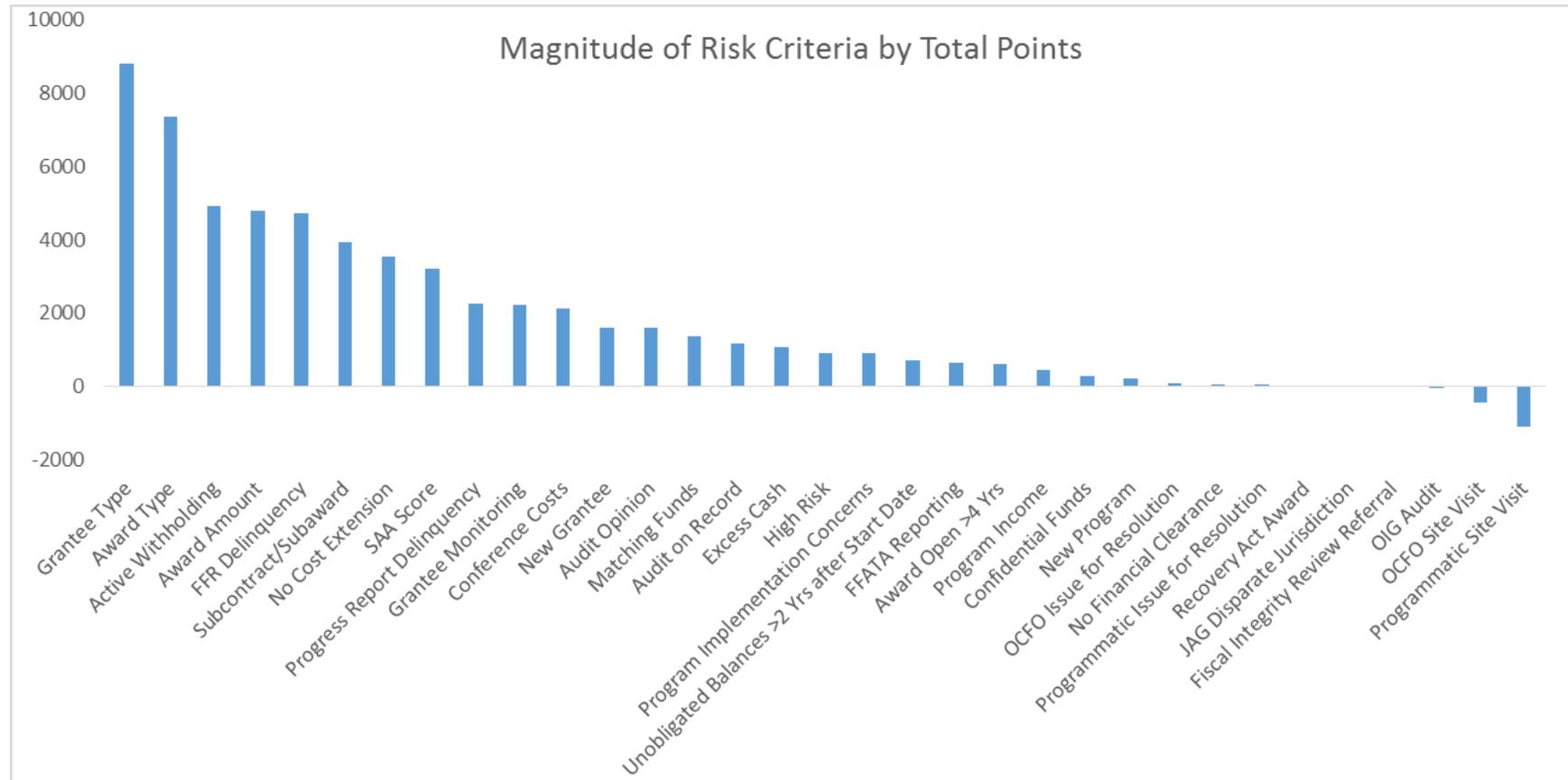
The chart below displays the number of grants that received points for each risk criteria. All risk criteria are used to assess grants and calculate a total score.





Appendix C. Magnitude of OJP Risk Criteria by Total Points

The chart below displays the distribution of total points by OJP risk criteria. Criteria are weighted and some, including recent monitoring, may subtract points from a total score.





Appendix D. FY 2015 COPS Risk Criteria

Name	Description	2013 Metric
Dollar Value	This query looks at the total federal award for all open and active grants. The score given to this metric is purely based on the amount of dollars on the award.	Total Award (per grant) > 1,000,000.00, then score of 4; Total award between \$500,000.00 and \$999,999.00, then score of 2. Any award less than \$500,000.00, then score of zero "0."
FFR_Number_Of_Delinquencies	How many times has grantee been delinquent on FFR 425 reports. Count total delinquent submissions of FFR 425 reports for the agency within the last 365 days.	If number of delinquent reports >= 2, then score is 2. If number of delinquent reports = 1, then score is 1. Otherwise score is zero "0."
Waiver	Does the agency have any open and active grants that have a waiver attached to it?	If yes, then score is 4. If no, the score is zero "0."
Special Conditions	Does the agency have any special conditions attached to open and active grants for program type other-tech, CIS, TRGP, CSPP, or INTEROP. For other-tech, the award start date needs to be after FY2005 ends.	Count each open and active grant with a special condition as score of "1" then add them up for the agency.
Local Match	Count all open and active award with a local match for the agency.	Each local match award count as score "2," if none then count as zero "0."



Name	Description	2013 Metric
IRM Barred	Count all agency IRM issues and based on bar_expiration_dt, assign score to each issue found	If bar_expiration_dt greater than today (getdate()) function, then score of 10, if bar_expiration_dt within last two years (less than or equal to 730 days), then score of 6, if bar_expiration_dt more than 2 years old (greater than 730 days), then score of 4.
IRM Compliance	Count all IRM issues that have issue_source_ID of 3, 4, 11, or 14 then score them based on "active" status and age of issue	If the issue is "active" and it is older than 2 years (greater than 730 days) then score of 6, if issue is "active" and created within last 2 years (less than or equal to 730 days) then score of 2, if the issue is "resolved" and the issue is less than 2 years old (less than or equal to 730 days) then score of 4.
IRM Compliance Other	Same as number 7 above, however this query looks at the other IRM source IDs (any issue_souce_ID not in 3, 4, 11, or 14)	If the issue is "active" and it is older than 2 years (greater than 730 days) then score of 6, if issue is "active" and created within last 2 years (less than or equal to 730 days) then score of 2, if the issue is "resolved" and the issue is less than 2 years old (less than or equal to 730 days) then score of 4.
OIG Audit	Check for any active AMS audits on the grantee.	If there are any active AMS audits, then the score is "4," if there are any previous but currently closed/inactive AMS audits, then score is "3." Otherwise score zero "0." This is not a sum score, just a single one time score of "4," "3," or "0."



Name	Description	2013 Metric
Modifications	Count all modifications approved per grant per agency then add them up per agency.	If only two modifications approved then score = 1, for 3 or more modifications approved then score is 3.
Extensions	Need to find the difference between the original project end date and the most current project end date (latest extension), the score the finding based on the length of the extension	Extensions that are between 2 and 5 years, score as "2." Extensions that are greater than 5 years, score as "4."
CHRP	Need to determine is agency has received a CHRP grant (and that grant is still ACTIVE) then score accordingly	If agency has received CHRP award that is still active then score = 2, else 0
1stTimeHiringGrant	Need to determine if this is the first time in the agency's history that they have received a hiring grant (see question)	If received 2013 hiring grant AND this is the first time the agency has received hiring grant then score =2, else 0
1stTimeAwarded	Need to see if this is the first grant the agency has ever received	If the 2013 award is the first time the agency has received grant from COPS, then score = 1, else 0
Category C	If agency selected category C for any hiring grant, then add 1 per grant	This will be a sum on a per grant basis, if the agency received 3 grants and selected category C on all of them, then they would get a score of 3.
Category B	If agency selected category B for any hiring grant, then add 1 per grant	This will be a sum on a per grant basis, if the agency received 3 grants and selected category C on all of them, then they would get a score of 3.



Name	Description	2013 Metric
New Grantee	Has agency received a grant in last 3 years?	Looked to see any agency that received a grant in 2011, 2012, or 2013.
Active Withhold of Funds	Need to determine list of agencies that have approved awards that have not returned their signed award document yet	
PR Delinquency Count	For all programs *EXCEPT CHRP* How many times has grantee been delinquent on Progress Reports submissions within last 365 days for each approved award (grant)?	For all programs *EXCEPT CHRP* Need to find new NexGen PR table and query for delinquency. Count number of times delinquent (D) for scoring: D >= 3, then 2; D = 2, then 1; D = 0, then 0.
PR Delinquency Count - CHRP Only	same as #22 above, but *CHRP ONLY*	Same scoring as # 22 above.
Reported Expenditure Line "E"	Excess cash is overdrawn funds. This is taken from Line "E" on the FFR 425 report which shows reported expenditures on the excess cash from drawn-down funds.	The query should start from 10/01/2012. If any excess cash reported then score = 2 (total, not summing the score).
Extensions	Need to count how many extensions an agency has received to their original project end date.	If any given agency has received more than one (1) extension, then score = 2. Else zero "0"
Enhanced CHP 2011	Need to determine any agency that has received a CHP grant on or after 2011.	Score is 2 if yes, CHP 2011, CHP 2012, or CHP 2013.
2013 CHP SROs	Any agency that received SROs for 2013 CHP grant	Score is 2 if yes for CHP 2013 SRO



Name	Description	2013 Metric
2orMoreGrants	Query for any agency that has 2 or more active grants	If agency has 2 active grants, then score 2; if agency has more than 2 active grants, then score 4.
SiteVisit	Query to find all agencies that have had a site visit within past 3 years	Score = 1 if site visit in past 3 years



Appendix E. FY 2015 OVW Risk Criteria

Office of Violence Against Women

Assessment Worksheet

Question 1: Select yes if any of the following apply.

Answer: Yes; No;

- The grant was awarded as a result of a Congressional Earmark.
- The grant was awarded under a newly-established OVW grant program.
- The grant is a non-competitive special project.

Question 2: Select yes if any of the following apply.

Answer: Yes; No;

- The grant is a demonstration initiative, cooperative agreement, or technical assistance project that exceeds \$500,000; or
- The grant project/grantee involves intense scrutiny by the Administration, Congress, media, DOJ, or OVW that makes it high profile; or
- The grantee is a nonprofit nongovernmental organization.

Question 3: Select yes if any of the following apply.

Answer: Yes; No;

- The grantee is an Indian Tribe, a Territory, a For Profit business, a Faith-based organization, or an Individual.
- This is the first time the grantee is receiving OVW funding and they have not yet completed the first funding cycle.

Question 4: Select 'Yes' if any of the below apply to the grant, program or subject matter.

Answer: Yes; No;

- Complex; or
- Incorporates new technology; or



- Receives assistance directed by program manager;
- Receives increased monitoring or requires additional oversight.

Question 5: Identify whether or not the grantee has project-specific special conditions and rate their level of non-compliance with all special conditions attached to their award.

Answer: High; Medium; Low

Select “**High**” if the grantee:

- Is not currently in compliance with award special conditions; or
- Has restrictions on their award special conditions due to issues with past performance.

Select “**Medium**” if the grantee:

- Has special conditions beyond the standard special conditions that require the grantee to take special action; or
- Has special conditions added resulting from statutory requirements.

Select “**Low**” if the grantee:

- Is in compliance with award special conditions and has no additional special conditions requiring the grantee to take specific actions within a specified timeframe.

Question 6: Rate the grantee’s level of responsiveness.

Answer: High; Medium; Low

Select “**High**” if the grantee:

- Has been nonresponsive, needed guidance or revisions to office requests on more than two occasions.

Select “**Medium**” if the grantee:

- Acknowledges office requests but has not addressed the request(s) to the office’s satisfaction.

Select “**Low**” if the grantee:

- Is responsive to the office requests.

Question 7: Rate the timeliness of the grantee’s Federal Financial Report (FFR) submissions.



Answer: High; Medium; Low

Select "**High**" if the grantee:

- Has submitted a FFR after the established due date (resulting in the withholding of funds) on two or more occasions.

Select "**Medium**" if the grantee:

- Has submitted a FFR after the established due date (resulting in the withholding of funds) on one occasion.

Select "**Low**" if the grantee:

- Has submitted all FFRs on or before the due date.

Question 8: Rate the accuracy and completeness of the grantee's FFRs and the normalcy of spending patterns.

Answer: High; Medium; Low

Select "**High**" if the grantee:

- Has submitted a FFR that is incomplete on two or more occasions; or
- Has an error that requires FFR to be resubmitted on two occasions; or
- Has a history of not meeting the financial requirements of the grant/award on two or more occasions; or
- Has exhibited unusual spending patterns in relation to grant activities.

Select "**Medium**" if the grantee:

- Has submitted one FFR that is incomplete; or
- Has submitted a FFR that generated concerns for which the office initiated an inquiry on one or more occasions.

Select "**Low**" if the grantee:

- Has met financial requirements and submitted complete and accurate FFRs.

Question 9: Rate the timeliness of the grantee's programmatic status report submissions.

Answer: High; Medium; Low

Select "**High**" if the grantee:



- Has submitted a programmatic status report after the established due date (resulting in the withholding of funds) on two or more occasions.

Select “**Medium**” if the grantee:

- Has submitted a programmatic status report after the established due date (resulting in the withholding of funds) on one occasion.

Select “**Low**” if the grantee:

- Does not have a history of submitting late programmatic status reports.

Question 10: Rate the completeness and accuracy of grantee’s programmatic status reports.

Answer: High; Medium; Low

Select “**High**” if the grantee:

- Has submitted a programmatic report that is incomplete and/or inaccurate on two or more occasions.

Select “**Medium**” if the grantee:

- Has submitted a programmatic report that is incomplete and/or inaccurate on one occasion.

Select “**Low**” if the grantee:

- Compliant with programmatic reporting requirements.

Question 11: Is the grantee on the DOJ High Risk List?

Answer: High; Medium; Low

Select “**High**” if the grantee:

- Was on the OJP High Risk List in the past 12 months.

Select “**Medium**” if the grantee:

- Was on the OJP High Risk List but was removed during this 12-month review period.

Select “**Low**” if the grantee:

- Has not been on the OJP High Risk List in the past 12 months.



Please note: this answer is pre-populated based on the OJP High Risk List during the rating period, and therefore cannot be edited. However, you can add any comments about the grantee's status if applicable.

Question 12: Rate the grantee's ability to successfully implement their proposed project.

Answer: High; Medium; Low

Select "**High**" if the grantee:

- Has implementation delays or obstacles that hinder their ability to adequately meet program goals and objectives; or
- Has unresolved issues related to project implementation; or
- Has requested two or more grant adjustment notifications (GANs) in the areas of (1) scope or (2) budget modifications.

Select "**Medium**" if the grantee:

- Has had concerns related to project implementation that have been resolved adequately; or
- Has requested one grant adjustment notifications (via GANs) in the areas of (1) scope or (2) budget modifications.

Select "**Low**" if the grantee:

- Has had no concerns related to the implementation of the program within the past year.

Question 13: Rate the quality of the grantee's work products/deliverables.

Answer: High; Medium; Low

Select "**High**" if the grantee:

- Has on two or more occasions failed to produce agreed upon deliverables;
- Has on two or more occasions failed to submit a product for OVW review and/or approval prior to its use;
- Has on two or more occasions submitted a tangible work product such as a report, or training curriculum, that was poor quality; or
- Has failed to improve deliverables address concerns as communicated with the grantee within key correspondence.

Select "**Medium**" if the grantee:



- Has recently submitted a tangible work product such as a report or training curriculum that was poor quality but has corrected and/or improved the deliverable in response to communication provided by OVW and/or OVW TA providers.
- Has on one occasion failed to submit a product for OVW review and/or approval prior to its use.

Select “**Low**” if the grantee:

- Has produced only quality deliverables; or
- Will not be producing/delivering any products for this grant project.