



FY2018 Second Chance Act Grantee Orientation

October 25, 2018

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Speakers

BUREAU OF JUSTICE ASSISTANCE (BJA)

Ruby Qazilbash, Associate Deputy Director for Justice Systems Policy Jennifer L. Lewis, State Policy Advisor E. Tracey A. Willis, MSW, State Policy Advisor Jennifer Johnson, Senior Research Associate, Booz Allen Hamilton (PMT) Lauren Duhaime, Senior Research Associate, Carnevale Associates, LLC (PMT)

THE COUNCIL OF STATE GOVERNMENTS (CSG) JUSTICE CENTER Nicole Jarrett, PhD, Director, Corrections and Reentry

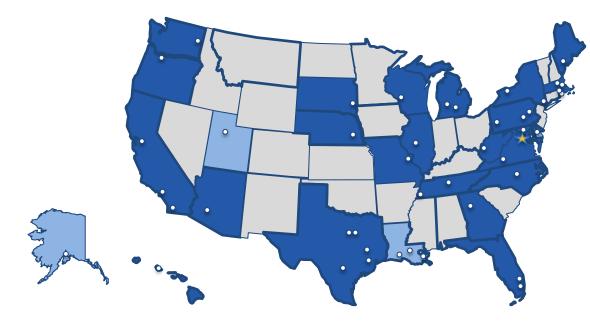


Overview

- 1. Welcome and Congratulations
- 2. Introduction to the National Reentry Resource Center (NRRC)
- 3. Post-Award Grant Management and Federal Compliance
- 4. Questions and Answers



FY2018 Second Chance Act (SCA) Grantees



71 Adult Grantees

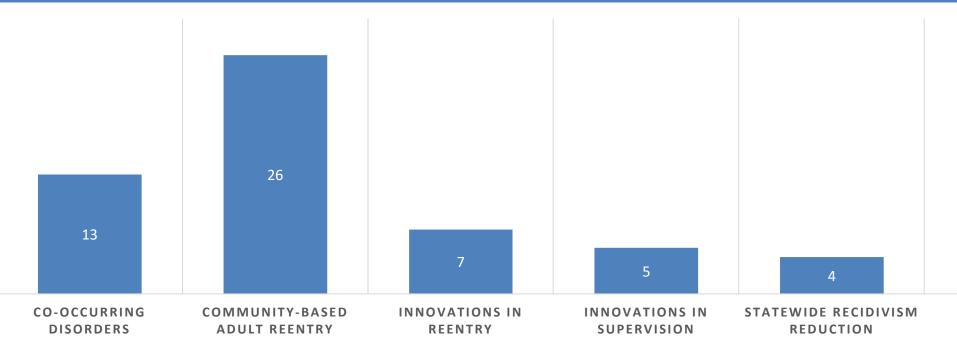
Grants funded and administered by BJA

15 Juvenile Grantees

Grants funded and administered by the Office of Juvenile Justice and Delinquency Prevention (OJJDP)



FY2018 SCA Adult Grantee Cohort





FY2018 SCA Juvenile Grantee Cohort



IMPROVE OUTCOMES FOR YOUTH: CO-OCCURRING IMPROVE OUTCOMES FOR YOUTH: ANTIGANG STRATEGIES NEEDS OF INCARCERATED PARENTS



U.S. Department of Justice Bureau of Justice Assistance

Mission: To provide leadership and services in grant administration and criminal justice policy development to support local, state, and tribal justice strategies to achieve safer communities.

About the Second Chance Act

Second Chance Act grants support state, local, and tribal governments and nonprofit organizations in their work to reduce recidivism and improve outcomes for people returning from incarceration. **The Second Chance Act has supported over \$300 million in reentry investments across the country.**



The National Reentry Resource Center (NRRC)

- **Delivers** technical assistance and training for SCA grantees
- Advances the knowledge base of the reentry field
- **Promotes** what works in reentry and successes of grantees
- **Facilitates** peer networks and information exchange
- **Provides** information for people returning to communities and their families



the NATIONAL REENTRY RESOURCE CENTER

Funded and administered by the U.S. Department of Justice's Bureau of Justice Assistance, the NRRC is the nation's primary source of information and guidance in reentry. www.NationalReentryResourceCenter.org



Expectations for SCA Grantees

- ✓ Meet your project objectives.
- ✓ **Complete** your Planning or Planning and Implementation Guide.
- Use validated risk and needs assessment instruments and the most appropriate evidence-based practices to serve your target populations.
- ✓ **Track your progress** and complete a project evaluation.
- Communicate regularly with your technical assistance (TA) provider and seek help when needed.



What SCA Grantees Can Expect

Ongoing and timely support from:

BJA program and policy staff



 The National Reentry Resource Center



The Role of the NRRC TA Provider

The NRRC's TA providers will work closely with you throughout the planning and implementation of your SCA grant.

Technical assistance will be tailored to each grantee and will reflect each jurisdiction's unique characteristics and resources. NRRC TA providers will work closely with each grantee to ensure the applicability and relevance of the assistance.

TA support will be provided through:

- Monthly calls
- Site visits
- Trainings
- Distance-learning opportunities



The Role of the NRRC TA Provider







Hosts peer learning communities



The Role of the NRRC TA Provider



Shares evidence-based practices and promising strategies to overcome implementation barriers





Works closely with BJA to promote grant management and reporting requirements



www.NationalReentryResourceCenter.org

Latest News & Resources in Reentry

RECENT HEADLINES

Pa. Banking on Program Providing Former Inmates with Financial Literacy

CTOBER 3.2018

PUBLICATIONS.

Pennsylvania has a new idea to help lower recidivism rates. Two state agencies have launched a pilot program that teaches financial literacy to inmates at state prisons through a course on credit and banking basics. The class is a collaboration between the Department of Corrections and the Department of Banking and Securities.



FUNDING & ANNOUNCEMENTS

Register for Webinar: SOAR-A Reentry Tool for Individuals Involved in the Criminal Justice System October 9, 2018

Date: Wednesday, October 24

WEBINARS



Nowhere to Go: Homelessness among Formerly Incarcerated People August 31, 2018

This report provides the first estimate of homelessness among the 5 million formerly 💌

Clean Slate

Technology and Criminal Record Clearance September 3, 2018

This webinar explores how technology has influenced criminal record clearance

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National Criminal Justice Initiatives Map



Directories for State and Local Reentry Services



Reentry Services Directory

The Reentry Services Directory was developed by the National Reentry Resource Center (NRRC) to help individuals who have been incorcerated and their families find local reentry services. The NRRC has compiled a list of organizations and service providers who can address different reentry needs, including housing, employment, and family reunification.

:3

Promoting SCA Grantees: Highlights and Successes

To help NRRC staff promote their work, grantees are encouraged to share:

- Individual success stories demonstrating human impact
- Measurable progress (e.g., recidivism reduction, number of participants served, etc.)



Iowa's Statewide Recidivism Reduction Strategy: Highlights and Progress

By COG Justice Center Staff

Iowa's Statewide Recidivism Reduction Strategy: Highlights & Progress

"From the moment [a person] walks into our door until he returns to the community, we are using the SRR tools we have been given to assist [that person] in being a productive member of his community."

Kris Weitzell Warden Newton Correctional Facility

"Every time I walk in [to IMPACT], I feel like the people there, the staff and the clients, they know me deep down. They've guided me and they see me for who I am. Nothing beats that sense of community." Byron Davis Former participant in the reentry and mentoring program run by IMPACT Family Counseling, a Second Chance Act granter

> the NATIONAL REENTRY RESOURCE CENTER

10 Years Of #SecondChanceAct "I have the motivation to be in control of my own choices—for how I see my future and how I see my children's future. That's what the program taught me." Darius Dennis

#SecondChanceAct

Former participant in the Strengthening Fathers reentry program run by the Up Center, a Second Chance Act grante

#SecondChanceAct

RESOLUCE CENTRE

THE NATIONAL REENTRY RESOURCE CENTER



Among Operation My Home Town participants

tracked between 2011 and 2014, 78 percent

of those who had been released from jail at least two years prior had **no record of**

recidivating after two years.

Grant Program-Specific Webinars

Objectives

- Review program-specific expectations
- Share successful strategies
- Discuss the Planning and Implementation (P&I) Guide

SCA Grant Program	Webinar Date & Time
Community-Based Adult Reentry, Category 1	Oct. 30, 2:00 p.m. ET
Improving Reentry for Adults with Co-occurring SAMI	Nov. 1, 2:00 p.m. ET
Innovations in Reentry Initiative	Nov 5, 2:00 p.m. ET
Innovations in Supervision Initiative	Nov 6, 2:00 p.m. ET
Statewide Recidivism Reduction	Nov 6, 1:00 p.m. ET
Community-Based Adult Reentry, Category 2	Nov 7, 2:00 p.m. ET
Adult Reentry and Employment	Nov 8, 2:00 p.m. ET

BUREAU OF JUSTICE ASSISTANCE

Second Chance Act

PERFORMANCE MEASURES TRAINING

Welcome grantees and program team members!

October 2018



Objectives



- Understand:
 - Why we require performance measures
 - Reporting requirements for performance measurement
 - The performance measurement questionnaire structure
- Getting started with the Performance Measurement Tool (PMT) system.



Why Do We Have Performance Measures?



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- To identify areas of success and potential areas of improvement
 - System improvements, including internal training and technical assistance (TTA) and external messaging



- To track activity and progress
 - Informs decision-making



- To understand how funds are being distributed
 - Informs budget, strategic plan, and future funding
 - Enables BJA to respond to external requests (e.g., congressional inquiries, media requests)



To comply with the law

Government Performance and Results Modernization Act of 2010



Performance Management Reports

- High-level analysis at the program level
- Highlights program accomplishments
- Uses quantitative and qualitative PMT measures

FT 3016 Acrosity Report

Justice Assistance Grant Program

Activity Report, Fiscal Year 20161

The Edward Byrne Memorial Justice Assistance Grant (JAG) Program, administered by the Bureau of Justice Assistance (BJA), is the leading source of federal justice funding to state and local jurisdictions. The JAG Program provides states and local jurisdictions with critical funding necessary to support a range of programs, activities, and equipment purchases.

Justice Assistance Grant Program 2018

BJA's Performance Measurement Tool (PMT) uses two data collection methods to gather the data shown in this report. Recipients of awards in fiscal years (FYs) 2009-2014 report on one set of performance measures that focus on aggregate totals. Recipients of FY 2015 and future awards report on a revised set of performance measures that allow for more detailed data collection.

All data in this report are presented by fiscal year of the award. This report includes all grantees that are or have been active as of September 30, 2017, but it is primarily focused on FY 2016 grantees. Grantees that have not yet begun to expend JAG funds as of September 30, 2017 are not included.

The first two sections of this report provide information on funding allocations by total and by program area for FYs 2014-2016 grantees. The rest of the report covers a more detailed analysis of FY 2016 grantees.

PMT Allocations

During their first reporting period, grantees are asked to provide expected funding allocations for their we of JAG funds for the life of the sward2 (Table 1). Some funding allocations are not vet captured in the PMT, as grantees are only required to answer PMT questions when they begin to draw down their award. Because of this, allocations data are more complete for older cohorts than newer ones.

Cohort	Total lunds allocated in PMT	Total amount awarded by BJA	Percent of funds captured in PMT
FY 2014	\$225,895,891	\$279,862,003	81%
FY 2015	\$242,414,465	\$245,437,148	98%
FY 2016	\$138,259,084	\$263,966,944	52%
Total	\$605.920.832	\$790.266.095	76.7%

any PMT report, sociation data only on accume	UA grant recipients of PTV 2004-2006 grants. Values are calculat a data entry by grantees. The data provided accurrely pellect the flavor silocations do not reflect superars, spent to date	
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DOJ Strategic

Promote and strengthen

Objectives

BJA Performance Update October 2015-September 2016

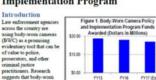
FY17(fig)

Body-Worn Camera Policy and Implementation Program

relationships and strategies for the administration of justice with state, local, tribal, and international law enforcement

Program Goals 1. Promote the careful and deliberate use of body-worn cameras and body-worn camera policy development

- Help de-escalate conflicts between police and community members. resulting in improved safety for all
- Increase the number of police agencies using body-WORD CALDERAS
- 4. Assist law enforcement agencies to develop a comprehensive approach that employs body-worn cameras in officer practice. resulting in increased accountability and transparency.



cameras can enhance downstream justice outcomes by providing unalterable digital evidence. When properly implemented, body-worn cameras can enhance officer and citizen safety and improve law enforcement interactions with the public. This research reveals that the presence of body-worn cameras helps strengthen accountability and transparency.¹ and can assist in deescalating conflicts, resulting in more constructive encounters between the police and members of the community. Several studies to date have documented substantial decreases in complaints against officers and use of force by police when body-worn cameras are deployed.¹²³ Studies have also identified decreases in the number of frivolous complaints filed against officers3 and "founded" complaints.) The U.S. Department of Justice (DOJ) recognizes body-worn cameras as a law enforcement strategy that can be effective in improving public safety, reducing crime, and fostering public trust between police and the citizens they serve.

Program Overview

For fiscal year (FY) 2015, DOJ awarded over \$18 million to support the implementation of BWC programs in law enforcement agencies across the country (Figure 2). The program awarded 70 sites for implementation and expansion of existing BWC programs. Another award was issued to a national training and technical assistance (TTA) provider to build a national capacity to support the implementation of recommended bodyworn camera policy. Figure 1, above, presents the amount of funding awarded to BWC programs under each solicitation.

Miller, L., Tollmer, J., & Police Executive Research Foreira. (2014). Implementing a Body-Wern Convers Program: Recommunication; and Lecons Learned Einsteington, DC: Office of Community Oriented Policing Services.

White M.D. (2016). Policy Office Rady-Wire Connect: Attention for Dislayor, Windowsen, DC: Office of Connective Optimum Deleting Services. ¹ Karn, C.M., Kartenbach, M., Casen, D.E., & White, M.D. (2013). Proceed: article destance: Destanting the Impact of Police Officer Red-Firm Consent: Washington, DC: Barren of Justice Austinaces, Officer of Justice Program, U.S. Department of Justice.

DIO-87A-16-5-0272 O5-30F-0134L

-1-

Performance Measures



Program Performance Measures collect quantifiable and short answer data on program activities funded by the grant award.

 Most questions ask grantees to provide numeric data, give short answers, or choose from options listed

Narrative Questions are qualitative questions asked of all BJA grantees about program goals, objectives, and more.

- Open-ended
- Can contain numbers



PMT Reporting Schedule



✓ Quarterly:

- Data Entry every three months.
- 30 days after the end of the reporting period to enter the data.
- You are encouraged to create a report for your records after each quarter's data entry.

✓ Semiannually:

- Standard narrative questions for the previous six months of activity.
- You must submit a report from the PMT to BJA as an attachment to your Progress Report through the Grant Management System (GMS).

✓ Closeout:

- You are required to answer the narrative questions based on your activity since your last PMT report submission to the GMS.
- You are required to submit a PMT Final Report to BJA as an attachment to the Final Progress Report through the GMS.



PMT Reporting Schedule

Reporting Period	Type of Data Required	PMT Due Date	Upload to GMS? When?	
January 1-March 31	Program Performance Measures	April 30	No	
April 1–June 30	Program Performance Measures and Narrative Questions	July 30	Yes July 30 No	
July 1-September 30	Program Performance Measures	October 30		
October 1-December 31	cember 31 Program Performance Measures and Narrative Questions		Yes January 30	
Last reporting period of grant award	Program Performance Measures, Narrative Questions, and Closeout Measures	30 days after reporting period end	Yes 30 days after reporting period end	



Performance Measure Questionnaire Links

Innovations in Supervision	https://bjapmt.ojp.gov/help/SSPMeasures.pdf
Innovations in Reentry	https://bjapmt.ojp.gov/help/scareentryquestionnaire.pdf
Statewide Recidivism Reduction	https://bjapmt.ojp.gov/help/scareentryquestionnaire.pdf
Comprehensive Community-Based Adult Reentry	https://bjapmt.ojp.gov/help/scamentoringquestionnaire.pdf
Co-Occurring Substance Abuse and Mental Illness	https://bjapmt.ojp.gov/help/scaco-occurringquestionnaire.pdf
Supplemental Health Care related questionnaire for all programs:	https://bjapmt.ojp.gov/help/ACAMeasuresFinal.pdf

Use the questionnaires as a guide to track and compile data outside of the PMT tool throughout the quarter. Then log in to the PMT to enter data at the end of the quarter.



Semiannual Narrative Questions

NARRATIVE QUESTIONS

You will be asked to answer the following questions in January and July of each calendar year. Answer the questions based on the 6-month period. You can use up to 5,000 characters for each response.

1. What were your accomplishments within this reporting period?

Report on accomplishments in the last 6 months.

2. What goals were accomplished, as they relate to your grant application?

Report on accomplishments related specifically to goals described in your grant application.

What problems/barriers did you encounter, if any, within the reporting period that prevented you from reaching your goals or milestones?

Questions 3 and 4 can inform activities of the TTA provider or other BJA support.

 Is there any assistance that BJA can provide to address any problems/barriers identified in guestion 37

A. Yes (Please explain below)

B. No (Go to question 5)

 Are you on track to fiscally and programmatically complete your program as outlined in your grant application?

A. Yes (Go to question 6)

B. No (Ptease explain below)

Include description of any programmatic and fiscal issues you are behind on and strategies to resolve these issues.

6. What major activities are planned for the next 6 months?

Response to this question requires a forward-looking plan.

Based on your knowledge of the criminal justice field, are there any innovative programs/accomplishments that you would like to share with BJA?

Questions 7 and 8 provide opportunities to highlight programs positively.

Does the grantee have any success stories that BJA can highlight and share with the public?

A. Yes (Please explain below) B. No.

Note: Question 8 does not apply to all programs.

Required Data at Closeout: Court and Criminal Involvement Data



- You are asked to report data into PMT at grant closeout about the number of program participants that have encountered Court and/or Criminal Involvement events.
- Make sure to track this data throughout the life of your grant.

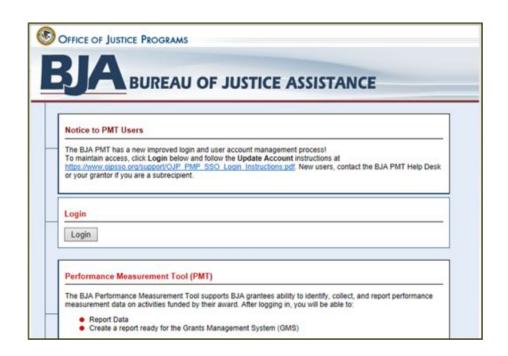
Mea	sure	Arrested and Booked on a New Charge	Conviction for a New Charge	Revocation of the Terms of Supervised Release	Reincarceration
A	Participants still in the program				
в	Participants who successfully completed the program				
с	Participants who unsuccessfully completed the program				

See the Court and Criminal Involvement section at the end of the performance measures questionnaire for a full list of recidivism-related items you are required to report.

BJAA Bureau of Justice Assistance U.S. Department of Justice

What is the PMT?

- BJA's PMT is the online system required for grantee performance measurement reporting.
- It is structured as an online questionnaire.
- Grantees are required to report in the PMT every quarter.
- Please access the PMT at <u>https://bjapmt.ojp.gov</u>.





Getting started with PMT



1: Log In and Account Creation



		Innovation • Partne	Justice Progr trships • Safer Neighborhoods	ams
Þ	User Name Email Address	Performance M	Password Maximum of 3 attempts	Login Forgot Password
			abled to use this site. If not, site to enable JavaScript, click <u>here</u> t	navigation
B	JA	OVC	OJJDP	NIJ
		P	ivacy FOIA	

Next Step:

The award Point of Contact (POC) listed in GMS will automatically receive an email from the PMT system with instructions on how to set up a user account.

User Name: User Name is the user's email address

1: Log In and Account Creation



From: OJP PMP Administrator Subject: [BULK] OJP Performance Measurement Platform – New Account Importance: Low

An account has been established for you in the PMT. Please click on the link below to complete your user profile.

https://www.ojpsso.org/?sk=9B1C8BD3-A86A-6149-C8362CFF1093E5XX

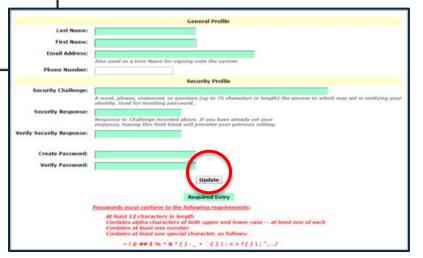
If, for some reason, the link does not work, copy the link and paste it into the Address Field of your browser.

The primary grantee or grant POC listed in GMS will receive an email from BJA PMT with instructions on how to create a new user account. The grantee POC may then add additional users. This includes subgrantees, if applicable.

Thank you.

OJP PMP Administrator CSR, Incorporated, contractor for: | Office of Justice Programs (OJP)

Enter information in all required fields, and click **Update** to continue.



1: Log In and Account Creation



Offi		JUSTICE ustice Prog s • Safer Neighborhood	
Perform	ance Meas	urement Platfo	rm
		Loand	
Home Updat	e My Account	Change Password	Admin
Click on BJA PMT to continue.	BJA	РМТ	

Here you can update or change your account and password by clicking on the corresponding links.

2: User Profile



Select the **Grantee Organization** or **Subgrantee Organization** profile, depending on your role, to enter/edit data.

Select a profile:

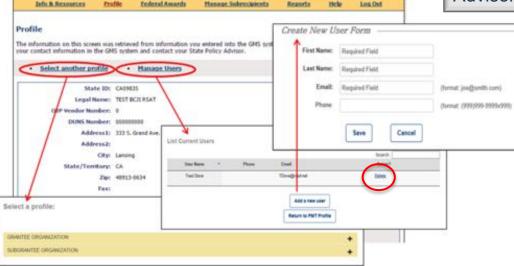
GRANTEE ORGANIZATION

SUBGRANTEE ORGANIZATION

2: User Profile



Check your profile for accuracy. If you need to make any changes, update your contact information in the GMS system and contact your State Policy Advisor.



Click on **Select another profile** to go back to the list of your assigned profiles.

Click on Manage Users and Add a new user or Delete to update the list of users.

3: Information and Resources



Info & Resources	Profile	Federal Awards	Reports	Help	Log Out	
			-			
Information and Resources						
Please be aware that your session will button before leaving the system unatte				a. To avoid	reentering data, click	the "save
You are responsible for creating a re	port from the	e Performance Measu	urement Tool	that is su	bmitted to BJA thro	ugh the

You are responsible for creating a report from the Performance Measurement Tool that is submitted to BJA through the Grants Management System (GMS). Please see the reporting schedule below for your due dates. During the non-submission periods, you are encouraged to create a report for your records.

Reporting Schedule 🖃					
BJA Grant Program	Type of Data Required	Reporting Period	PHT Due Date	Upload to GMS?	
ARRA JAG	Program Performance Measures	January 1 - March 31	April 30	No	
JAG	Program Performance Measures	April 1 - June 30	July 30	No	
	Program Performance Measures &	ALL CALIFIC TO	0.444.00	Yes	
	Narrative	July 1 - September 30	October 30	November 29	
	Program Performance Measures	October 1 - December 31	January 30	No	
CAGI CFTL	Program Performance Measures	January 1 - March 31	April 30	No	
Drug Courds 1433P 1969 1979 2014 PDMP PDMP RSAT SAVIN Second Chance SPI TCAP ARRA Byrne ARRA CONA ARRA CONA ARRA CONA ARRA CONA ARRA CONA ARRA CONA	Program Performance Measures & Narrative	April 1 - June 30	July 30	Yes	
				July 30	
	Program Performance Measures	July 1 - September 30	October 30	No	
	Program Performance Measures &	October 1 - December 31	January 30	Yes	
	Narrative	October 1 - December 31	January 30	January 30	

Use the navigation bar at the top to access different pages in the system. Do not use the back arrow on your browser. Remember: The system will time out after 30 minutes of inactivity.

You can find the following on the Information and Resources page:

- PMT Reporting Schedule
- Recorded Webinar Trainings
- PMT User Guide
- Performance Measures
- Frequently Asked Questions (FAQ)
- Other Resources

Stay Tuned for PMT Webinars



Upcoming PMT Webinars for each grant program will cover

- Performance Measures
- PMT System Navigation

Look for an email with more information soon!

- Statewide Recidivism Reduction Nov 13 (Tues), 1:00PM 2:00PM Eastern Time
- Innovations in Reentry
- Co-Occurring
- Community-Based
- Innovations in Supervision

Nov 20 (Tues), 1:00PM – 2:00PM Eastern Time Nov 21 (Wed), 1:00PM – 2:00PM Eastern Time Nov 27 (Tues), 1:00PM – 2:00PM Eastern Time Nov 28 (Wed), 1:00PM – 2:00PM Eastern Time

Webinars will be recorded, allowing newer staff to view at later dates.



Effective Programs Through a Solid Foundation

FY 2018 Second Chance Act (SCA) New Grantee Orientation Webinar October 25, 2018



BJA State Policy Advisors Jennifer L. Lewis E.Tracey A. Willis



Overview

- Special Conditions
- Reporting
- Financial Information
- Unallowable Costs
- Procurement/Subawards
- Subrecipient Monitoring

- Federal Reporting Requirements (FFATA & FAPIIS)
- Grant Adjustment Notice (GANs)
- Grant Monitoring Compliance
- Additional Information and resources



Special Conditions

Special conditions are terms and conditions that are included with the award.

- Special conditions may include additional requirements covering areas such as programmatic and financial reporting, prohibited uses of Federal funds, consultant rates, changes in key personnel, and proper disposition of program income.
- There are several mandatory special conditions that will be included on any DOJ award. A list of all the mandatory special conditions for OJP are available at the following link – http://ojp.gov/funding/Explore/SolicitationRequirements/MandatoryTermsConditions.htm

Some special conditions may be based on the program or the nature of the award itself.

- Your awards all contain special conditions that require compliance with data collection and reporting as detailed in the solicitation and your award documents.
- Some SCA awards include a special condition requiring the submission of the final analysis and evaluation report to be submitted prior to the award closeout.



BJA Bureau of Justice Assistance U.S. Department of Justice

Special Conditions

9	Department of Justice Office of Justice Programs Bureau of Justice Assistance	AWARD CONTINUATION SHEET Grant	PAUE 5 OF V	
NUCT NUMBER	200-83-01-1210	AW AND GATE IN 17 2000		
	SPICIAL	CONDITIONS		
	eclipient agrees to comply with the financia e of Justice Programs (OJP) Financial Ouid	l and administrative requirements set forth in Ie	the current edition of the	
roqui violut	red to submit one pursuant to 28 C.F.R. Soc	it an acceptable Equal Employment Opportu- tion 42.302), that is approved by the Officer solt in suspension or termination of funding.	for Crill Rights, in a	
Local other any e	Governments, and Non-Profit Organizatio related requirements may be imposed, if or	rional and/c requirements of OMB Creedur / ns, and further understands and agrees that for obtaining under issues (if any) from OMB C discorily and promptly addressed, as further	ends may be withhold, or realize A-133 audits card	
enave		one any federal fands, either detectly or induc ny law, regulation or policy, at any level of p		
subgr Act, o simple	The receipsent must promptly refer to the DOI OIG usy encluble evidence that a principal, employee, agent, contractor, subgrantee, subcontractor, or other person has other 1) submitted a false claim for grant finals under the Yabe Claims Act, or 2) committed a criterianil or corit violation of laws pertaining to final, conflict of interest, behavy, prateity, or similar misconduct should be reported to the Volume of the spectra of the spectra of the strength of the strength of the strength of the spectra of the VOL by -			
mail				
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C-814	-mail. oig hofinerijtedej per			
both	bothne: (contact information in English and Spanish): (800) 809-8499			
or ho	or holling fax: (202) 616-9981			
Adda	Additional information is available from the DOI OIG website at www.sadog.gov/oig.			
	policy statements or guidance, apply unles	or terms and conditions contained in this area		

COP FORDLAND 2 (REV. 4-88)



Withholding Special Conditions

Additional withholding special conditions- These conditions place holds on funds for overdue reports and/or pending budget approval, other program requirements including documentation that was missing or incomplete when the grant application was reviewed.

- Planning/Action Plan requirement Many of your awards have built in a planning period, leading to the development of a Planning and Implementation Guide or Action Plan. This comprehensive project work plan is developed with your National Reentry Resource Center (NRRC) technical assistance coach and program partners. Most of the awards also include a related withholding special condition that limits spending until the required planning documents are submitted and approved.
- It is important to work with your State Policy Advisor to remove any active withholding special conditions before your agency can to expend, obligate or draw down award funds.



Progress Reporting Requirements

Quarterly Performance Metric Tool (PMT) Programmatic reports: Submitted in PMT ONLY!

Reporting Period	Due Date			
January 1 – March 31	April 30			
April 1 – June 30	July 30			
July 1 – September 30	October 30			
October 1 – December 31	January 30			
PMT Website - <u>https://bjapmt.ojp.gov/</u>				

Semi-Annual Grants Management System (GMS) Programmatic reports: Submitted in GMS

- January 30 and July 30
- Upload PDF versions of your PMT to the report in GMS
- GMS Website <u>https://grants.ojp.usdoj.gov</u>
- Requires responses to BJA Seven Narrative Questions
- FINAL PROGRESS REPORTS: If your grant requires an evaluation as part of the project you must attach the evaluation report under the Final Progress Report in GMS.

NOTE: Hold on funds - GMS automatically freezes grant funds for delinquent reports. It is important to submit reports on time. Late reports also influence how your award is risk assessed by OJP.



Court and Criminal Involvement (CCI) Data Reporting

- Grantees are required to track unique identifiers for participants related to court and criminal involvement (recidivism data) during the award period and one year after release. Chief executives from organizations are required to sign and submit an assurance that all participant recidivism indicator data will be collected and submitted. Your program and evaluation must incorporate these requirements.
- Court and criminal involvement data must be collected throughout the award period, and reported in the FINAL PMT report. You must report quantitative, verifiable data on the following performance measures:
 - 1. Arrested and Booked on a New Charge
 - 2. Conviction for a New Charge
 - 3. Revocation of the Terms of Supervised Release
 - 4. Reincarceration



GMS: Federal Financial Reports SF-425

Reporting PeriodDue DateJanuary 1 – March 31April 30April 1 – June 30July 30July 1 – September 30October 30October 1 – December 31January 30

- Submitted in GMS: <u>https://grants.ojp.usdoj.gov</u>
- FFR Training and Technical Assistance Guide
 <u>https://ojp.gov/funding/Implement/Resources/FederalFinancialReportUse</u>

 <u>rGuide.pdf</u>
- No activity? Enter 0.
- For help with Federal Financial Reports, please contact OCFO Customer Service by phone at 1-800-458-0786 (option 2), or by email at <u>ask.ocfo@usdoj.gov</u>.



Important Reminders for Submitting a SF-425:

- Report actual funds obligated and/or expended, NOT your draw down amounts.
- Report from the recipient level.
- Report the correct match requirement. Once match is approved the amount can not be changed.
- Report program income as the cumulative amount, NOT a quarterly amount.
- Report correct indirect cost rate and/or base supplied by your cognizant federal agency.
- Report correct indirect cost rate type (provisional, final, or fixed).
- Report for every quarter regardless of whether or not expenses were incurred.



Financial Information

- Recipients agree to read and comply with the financial and administrative requirements set forth in the current edition of the current DOJ Grants Financial Guide. <u>https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf</u>
- To be allowable under federal awards; costs must be reasonable, allocable, and necessary to the project. In addition, they must comply with funding statute requirements.
- For guidance, grantees should refer to their original solicitation, program guidelines, award special conditions, and the approved budget.
- For specific factors to determine whether costs are allowable, please reference the DOJ Financial Guide, the program solicitation, and the applicable Cost Principles. <u>http://ojp.gov/funding/Apply/Resources/2CFR200_2013.pdf</u>
- The **OJP website** also offers updates and FAQs on the Uniform Guidance. <u>http://ojp.gov/funding/UniformGuidance.htm</u>



Grants Financial Management Training

- Grants Financial Management Online Training 24 module training emphasizing the basics of federal grants management designed for those responsible for the financial and programmatic administration of discretionary and/or formula grants. For information on the online training go to: <u>https://ojpfgm.webfirst.com/</u>.
- Completion of this training is required (FY 16 and beyond) award POCs and Financial POCs within 120 days of award acceptance. Failure to comply will result in a withholding special condition.
- Recertification is required, to remain in compliance with the financial management training requirement, by successfully the OJP Financial Management Training every (3) three years.
- The required training is also offered an in person format. For more information please go to: <u>https://live.impagint.com/ojptraining/index.html</u>.



Unallowable Costs

- Land Acquisition
- Lobbying
- Fundraising
- Compensation for Federal Employees
- Travel of Department of Justice Employees
- State and Local Sales
 Taxes

- Corporate Formation
- Costs Incurred Outside the Project Period
- Entertainment and Food and Beverage
- Bonuses or Commissions
- Program Specific
 Unallowable Costs



Unallowable Costs

In addition to the unallowable costs identified in the DOJ Grants Financial Guide, Second Chance Act awards funds may not be used for:

- Prizes/rewards/entertainment/trinkets (or any type of monetary incentive)
- Client stipends
- Gift cards
- Vehicles
- Costs that do not support approved project activities

NOTE: Direct representation in litigation, through court filings or through other litigation services, is not an allowable cost under FY 2018 funding.



Subawards and Procurement Contracts

The proper determination of whether a pass-through entity is a subaward or procurement contract is critical, as significantly different requirements and or rules apply to subawards and procurement contracts.

• The substance of the relationship should be given greater consideration than the form of agreement between the prime recipient and the outside entity.

If you delegate **program activities** to another entity (individual consultant or organization), that delegation will generally be considered a subaward. Most pass-through entities on your awards, are programmatic and substantive and are therefore should be classified as subawards.

 TIP: In any OJP award in which the recipient entity proposes to "collaborate" (or "partner") with another entity to accomplish its work (particularly when the OJP solicitation requires or encourages such a collaboration), an agreement by the recipient to pay the collaborator is very likely to be a "subaward", as determined by federal grants administrative requirements, rather than a "procurement contract under the OJP award." Specifically, program evaluators and research partners are award collaborators, and therefore are to be classified as subawards.



Subawards and Procurement Contracts

If the OJP recipient proposes to enter into an agreement to pay award funds to an outside entity, and the outside entity will **not** be carrying out all or part of a **public purpose** of the award but instead will only be providing "ancillary" goods or services the recipient needs, OJP will consider the agreement to be a "procurement contract under an award."

- TIP: If an OJP recipient is purchasing or leasing an item from an outside entity that makes the identical (or virtually identical) item widely available to others (e.g., to the mass market), absent unusual circumstances, OJP will consider the purchase or lease of the item by the recipient to be a "procurement contract under an award." (i.e. office equipment, software licensing, etc.).
- TIP: If the recipient is obtaining services from an outside entity that makes identical services widely available to others (e.g., to the mass market) that is, services that are not designed, modified, or adapted to meet particular needs of the recipient absent unusual circumstances, OJP will consider the agreement to obtain the services to be a "procurement contract under an award." (internet, cell phone service, maintenance, website hosting, etc.).



Subawards and Procurement Contracts

A "sole source" is a procurement by noncompetitive proposals.

• Must adhere to the standards set forth in Title 2 CFR 200.320(f).

Sole source approval is required by OJP if a recipient determines that the award of a procurement contract through a competitive process is infeasible. The Simplified Acquisition Threshold > \$150K.

Recipients may conduct noncompetitive ("sole source") procurement through solicitation of proposals from only one source when one or more of the following circumstances apply:

- The item/service is available only from one source.
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- Competition is determined inadequate after solicitation of a number of sources.

Grantees must submit a Sole Source Approval Grant Adjustment Notice (GAN) in GMS for approval.



For additional guidance on subawards and contracts, please review the subaward/contract toolkit, checklist and sole source justification fact sheets:

https://ojp.gov/training/pdfs/Subaward-Procure-Toolkit-D.pdf

https://ojp.gov/training/pdfs/Subrecipient-Procure-cklist-B.pdf

https://ojp.gov/training/pdfs/Sole-Source-FactSheet-C.pdf



Subrecipient Management and Monitoring Requirements

Recipients must have written subrecipient monitoring policies and procedures that meets the requirements under 2 CFR 200.331.

The purpose of monitoring activities is to provide reasonable assurance that the subrecipient has administered the pass-through funding in compliance with the laws, regulations, and the provisions of the award and that the required performance goals are being achieved.





Subrecipient Management and Monitoring Requirements

2 CFR 200.331 requirements for pass-through entities:

(a) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes federal award identification information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification.

(b) Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring.

(c) Consider imposing specific subaward conditions upon a subrecipient if appropriate.

(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.



Subrecipient Management and Monitoring Requirements

(e) Depending upon the pass-through entity's assessment of risk posed by the subrecipient monitoring tools (on-site visits, TTA, procedure arrangements) may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals.

(f) Verify that every subrecipient is audited as required by Subpart F - Audit Requirements of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the (\$750k) threshold.

(g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

(h) Consider taking enforcement action against noncompliant subrecipients.



Subrecipient Management and Monitoring Requirements

Monitoring of the subrecipient must include:

(1) Reviewing financial and performance reports.

(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.

(3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by § 200.521 Management decision.



Subrecipient Management and Monitoring Requirements

Key components to effective subrecipient/subaward monitoring include:

- 1. A subaward agreement that specifies task and requires progress and financial reporting, as well as possible noncompliance penalties and termination procedures.
- 2. Monitoring policies and procedures.
- 3. A risk-based monitoring plan for selecting subrecipients to monitor.
- 4. A process for on-site monitoring including a monitoring checklist that satisfies administrative, financial, and programmatic elements; process for documenting findings in a report; and procedures for follow-up on issues for resolution.



FFATA Reporting

End of the Month Following Subaward

- The Federal Funding Accountability and Transparency Act (FFATA) requires information on federal awards be made available to the public via a single, searchable website, <u>www.USASpending.gov</u>.
- FSRS (<u>www.fsrs.gov</u>) is the FFATA Subaward Reporting System used to capture and report sub-award and executive compensation data regarding the first-tier sub-awards to meet the FFATA reporting requirements.
- Prime recipients of awards \$25,000 or more report on any first-tier subawards of \$25,000 or more (effective October 1, 2010).
- To help navigate the submission process, user guides, FAQs, helpdesk and online demos are available at <u>www.fsrs.gov/resources</u>.
- For more information about FFATA, see http://ojp.gov/funding/Explore/SolicitationRequirements/FinancialRequirements.htm.



FAPIIS REPORTING

- The Federal Awardee Performance and Integrity Information System (FAPIIS) requires grantees to report information on certain civil, criminal, and administrative proceedings submitted to the federal designated integrity and performance system (currently, "FAPIIS") within the System for Award Management ("SAM") <u>https://www.fapiis.gov/fapiis/index.action.</u>
- OJP grants and cooperative agreements that exceed \$500,000 typically will include a condition that requires the recipient -- if the total value of its currently active grants, cooperative agreements, and procurement contracts from all federal agencies exceeds \$10 million, as set out in the condition -to report particular information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either its OJP award or any other grant, cooperative agreement, or procurement contract from the federal government. For more information go to http://ojp.gov/funding/FAPIIS.htm.



Grant Adjustment Notices (GANs)

- A GAN is used to request project changes and/or corrections.
- Once OJP makes a decision regarding the proposed change, the grantee is notified by GMS via e-mail.
- GANs are submitted and approved through GMS. GAN types include:
 - Budget Modifications
 - Change of Scope
 - Project Period
 - Point of Contact Information
 - Removal of Special Conditions
 - Sole Source (Non competitive procurement contract >\$150,000)
 - Costs Requiring Prior Approval (e.g. consultant rates >\$650 per day)
- GANs will not be approved if the grantee is delinquent on financial or programmatic reporting.



GAN: Change of Project Period No Cost Extension

- Must be requested through GMS at least 30 days prior to the current end date
- Generally, no more than one no-cost extension may be made to an award;
- A no-cost extension may not exceed 12 months past the original end date;
- A no-cost extension may be made only if the period of performance has not expired;
- A no-cost extension may be made only for award recipients that have no significant performance or compliance issues



Award Period Change GAN Requirements

Include the following information as an attachment to your GAN:

- 1. The current, unobligated balance
- 2. Explanation for <u>why</u> the project could not be finished before the current grant end date
- 3. Description of the pending <u>activities to be completed</u> during the requested extension period (revised timeline/time task plan)
- 4. How the grant funds will be utilized during the requested extension period
- 5. Robust narrative justification establishing that the extension is for the benefit of the Federal government

NOTE: The award period will not be extended merely for the purpose of using unobligated funds.

Additional narratives are required to establish extenuating circumstances for requests over 1 year. Such extenuating circumstances may include natural disasters, litigation, state or local legislative or regulatory schedules, for research and statistics projects: delayed IRB actions or OMB reviews, data collection and analysis, disclosure review, presentations of findings, archiving of data and dissemination of findings; and other extraordinary matters beyond the award recipient's control.



GAN: Change to Project Scope

Prior approval is needed when changes to your approved application include:

- Altering programmatic activities
- Affecting the purpose of the project
- Changing the project site
- Changing target population
- Changing the subgrantee/contract
- Work with your TA Coach for assistance prior to submitting a scope change GAN.



GAN: Budget Modification

Budget Revisions

- Processing a GAN for a budget modification is like reviewing a new budget. You must attach a revised budget & budget narrative for the full award amount. Some changes may require a scope change as well.
- Prior approval is needed when proposing the following changes:
 - A budget adjustment affects a cost category that was not included in the original budget
 - Change to Indirect Costs
 - <u>10% rule is exceeded</u>: The proposed cumulative change is greater than 10 percent of the total award amount - does not apply to an award of less than \$100,000

For more information on budget modifications requirements refer to the DOJ Grants Financial Guide.



GAN: Publication Plan Submissions

- All grantees and cooperative agreement recipients (grantees) should begin submitting publications for review via GANs in GMS.
- This applies to major publications such as evaluations or final reports.
- Grantees CANNOT use DOJ, OJP, or BJA logo without explicit prior approval.
- The grantee should select <u>PO Approval GAN and mark *"Publication Plan Submissions"* or *"Other: Publication Review,"* and attach their publication(s) into the GAN module.</u>
- The grantees should **explain their publication plan** (i.e., dates of distribution; target audience, etc.) in the GAN explanation block or in an attachment.
- In all materials publicizing or resulting from award activities, with the exception of press releases, the awarding agency assistance must be acknowledged. An acknowledgement of support shall be made through use of the following or comparable footnote: "This project was supported by Grant No. <AWARD_NUMBER> awarded by the Bureau of Justice Assistance. The Bureau of Justice Assistance is a component of the Department of Justice's Office of Justice Programs, which also includes the Bureau of Justice Statistics, the National Institute of Justice, the Office of Juvenile Justice and Delinquency Prevention, the Office for Victims of Crime, and the SMART Office. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice."



BJA Compliance Monitoring

BJA will conduct formal monitoring activities (site visits and desk reviews) of grant recipients to ensure grantee is:

- conducting activities that were proposed and approved;
- meeting programmatic, administrative, and fiscal requirements;
- identifying and resolving problems and/or issues; and
- receiving needed training and guidance.



BJA Compliance Monitoring – Common Issues for Resolution

- Unauthorized obligation of funds in violation of grant withholding special conditions and/or prior to budget clearance.
- Incorrect classification of subaward as a procurement contract.
- Use of funds for consultant rates in excess of \$650 per day (or \$81.25 per hour) without explicit prior approval from BJA via GAN.
- Accounting policies and procedures are not documented or need improvement, and lack of tracking award expenditures by approved budget category.
- Indirect cost rate charged improperly (rate expired) lack of budget modification GAN submission to reflect current rate agreement.



BJA Compliance Monitoring – Common Issues for Resolution (continued)

- Lack of subrecipient monitoring policies and procedures that meet the requirements of 2 CFR 200.
- Non submission of GANs for preapproval of award changes including scope, subrecipients, budget, target population, and assessment tools, etc.
- Lack of compliance with FFATA reporting requirements.
- Lack of documentation to support match activities and expenditures.
- Lack of documentation to support performance measurement data.



Single Audit Requirements

- Non-Federal entities that expend \$750,000 or more in Federal funds (from all sources including pass-through subawards) in the organization's fiscal year are required to arrange for a single organization-wide audit conducted in accordance with the provisions of Title 2 C.F.R. Subpart F.
- Non-Federal entities that expend less than the applicable audit threshold a year in Federal awards are exempt from Federal audit requirements for that year. However, non-Federal entities must keep records that are available for review or audit by appropriate officials including the Federal agency, pass-through entity, and U.S. Government Accountability Office (GAO).
- Audit reports are due no later than 9 months after the close of each fiscal year during the term of the award, and must be submitted electronically to the Federal Audit Clearinghouse at <u>https://harvester.census.gov/facweb/</u>.



Top Single Audit Findings (FY 2016)

Below are the most common findings from audits of DOJ awards in FY 2016, the most recent year for which this information is available:

- Procedures not documented or need improvement.
- Special conditions not met by grantee.
- Federal Financial Reports (FFR) not accurately prepared.
- Debarment and Suspension verification not performed or not properly documented.
- Federal Financial Reports (FFR) not submitted timely.
- Accounting system inadequate or not effectively utilized to account for grant funds.
- Excess cash-on-hand.
- Subrecipient monitoring not being conducted.
- Federal Financial Reports (FFR) amounts did not reconcile to grantee's accounting system.
- Progress reports not timely submitted.



For additional information

- BJA Website: <u>https://www.bja.gov/</u>
- State Policy Advisors: <u>https://www.bja.gov/About/Contacts/ProgramsOffice.html</u>
- Current BJA funding opportunities and FAQs concerning BJA funding: <u>https://www.bja.gov/funding.aspx</u>



Other important links

- BJA Grant Writing and Management Academy (five online training modules for the life of the grant including managing federal funds, strategic planning, and budgets): <u>https://www.bja.gov/gwma/index.html</u>
- Grants Management System (GMS): <u>https://grants.ojp.usdoj.gov/</u> GMS FAQs <u>https://grants.ojp.usdoj.gov/gmsexternal/gmsHelp/gms_faq.htm</u> GMS Training Tool: <u>http://www.ojp.gov/gmscbt/</u> GMS Help Desk: 1-888-549-9901
- BJA Performance Tools (PMT): <u>https://bjapmt.ojp.gov/</u>
 PMT Help Desk: 1-888-252-6867
- OJP award great online resources
 - OJP Grants 101: <u>http://www.ojp.gov/grants101/</u>
 - OJP Funding Resource Center http://ojp.gov/funding/index.htm
 - Post Award Instructions https://ojp.gov/funding/Implement/Resources/PostAwardInstructions.pdf
- OJP Standard Forms & Instructions: <u>http://ojp.gov/funding/Apply/Forms.htm</u>



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If you have questions not covered in this presentation, please contact your assigned BJA State Policy Advisor directly.

Questions and Answers





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