

BUREAU OF JUSTICE ASSISTANCE

FY 2022 Swift, Certain, and Fair Supervision Program: Applying the Principles Behind Project HOPE

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Welcome

1. Everyone will be on mute and there will be no video broadcasting other than slides.
2. If you would like to ask a question, please click on the Q&A button at the bottom of your screen. One of the hosts will either reply in the Q&A window or answer your question live. (Check *Send Anonymously* if you do not want your name attached to your question in the Q&A.)
3. We are recording this webinar and will make it available shortly.

Problems in Pretrial, Probation, & Parole

- Strained Resources
- Lack of Clarity
- Little Consistency
- Slow Response

What Is “Swift Certain Fair”?

Implementations of the SCF principles differ in operational details, but share:

- Close monitoring
- Swift and certain responses
- Modest sanctions & rewards



Procedural Justice
Legitimacy
Fairness

Key SCF Behavioral Response Principles

Clearly articulated rules and expectations

Credible intentions—promises and threats

Formal orientation and clear communication

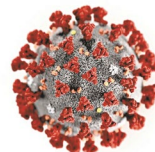
Supervision conditions closely monitored, actually enforced*

Every infraction met with an immediate response*

Incentives and rewards to reinforce compliance



*

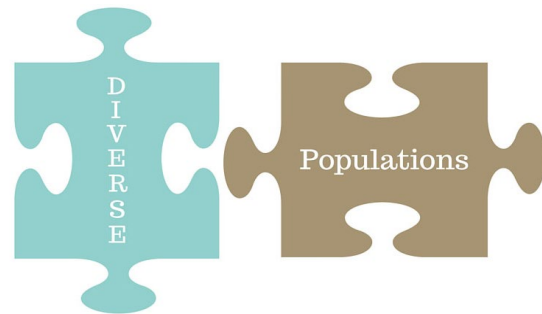


How Does This Work with a Risk-Needs-Responsivity Model?



Applying the SCF Principles

Different criminal justice populations



- High- and moderate-risk parolees (Washington)
- High-risk juveniles (two counties in Arizona)
- Pretrial supervision (Honolulu)
- Prison (Pennsylvania, Nebraska)
- High and moderate felony probationers (DeKalb Co., IL)
- Gun offenders (Monroe Co., NY; Cuyahoga Co., OH)
- Misdemeanor DV probationers (Bibb Co., GA)

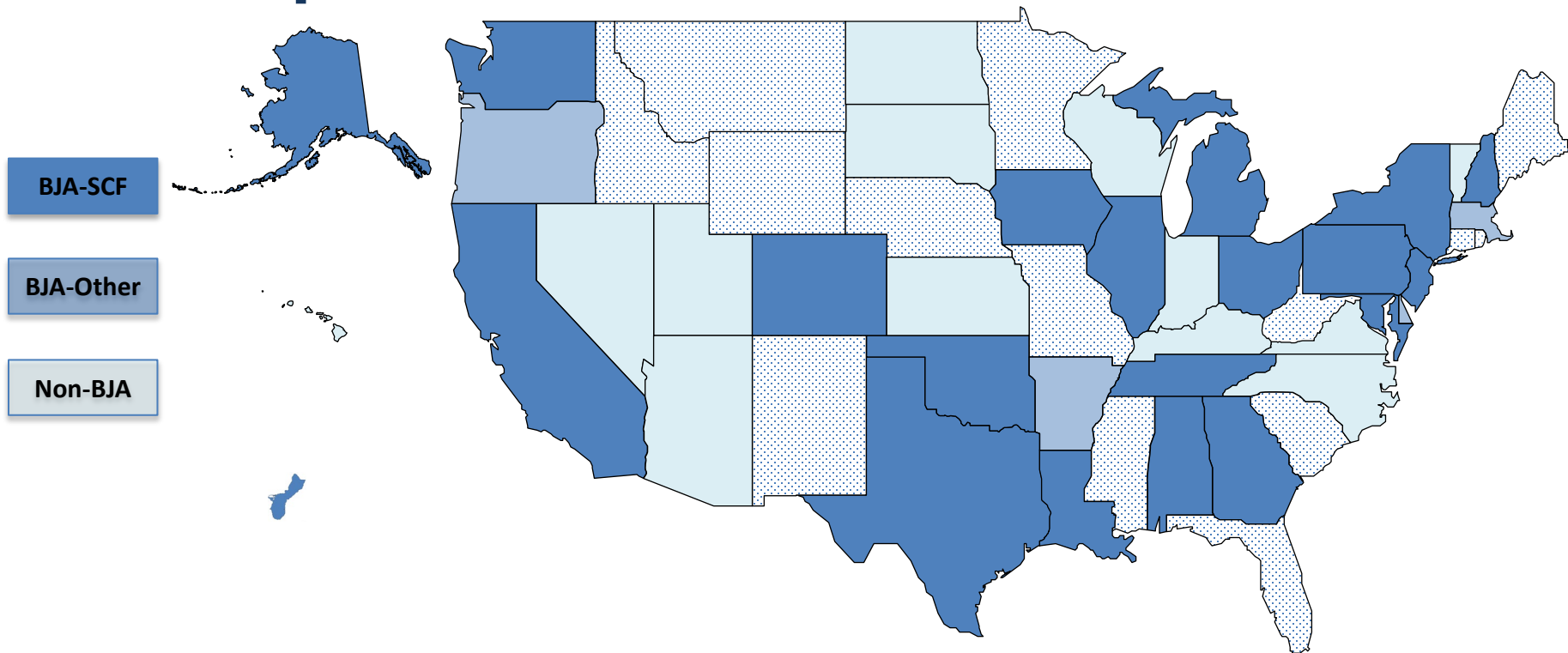
BJA Awards to Implement the SCF Principles

Includes:

- Cities, Counties, Territories, States, & Tribes
- Courts, Corrections, Probation, Parole, & Law Enforcement

- 2014: AK, AL, Lummi Nation, MI, NH, NY, OH
- 2015: AL, CO, OH, OK, PA
- 2016: AL, Guam, IL, OK, TX
- 2017: IA, MD, NJ, OK, PA
- 2018: CA, GA, OH, TN
- 2019: GA
- 2020: IL, LA, MI, OH
- 2021: AL, IA, MI, NY, TX

SCF Implementations and Awards



Target-Population Examples

Grantee	Target Population	Target Population Goal
NJ State Parole Board (FY17)	Opioid-involved parolees w/ history of violations	75
DeKalb County (IL) Court Services (FY16)	High-to-moderate-risk probationers	20
OK Department of Corrections (FY16)	High-risk persons on a statutory diversion program	432
Cuyahoga County (OH) Court of Common Pleas (FY20)	Young adult non-violent felony offenders with gun-related offense	135

Generalizability

What problem are you trying to solve?

What is your target population?

What is your jurisdiction?

What is business as usual?

What are your resources and constraints?

Proposed changes should be relative to where you begin



FY 2022 Swift, Certain, and Fair Supervision Program: Applying the Principles Behind Project HOPE

- BJA anticipates awarding \$4,000,000
- FY 2022 Opportunities:
 - Estimated Number of Awards: 5
 - Average Award Amount: \$800,000
- Eligible Applicants: State, local, and tribal governments
- Solicitation is open and can be found [here](#).

Application
deadlines

Grants.gov: 5/20/22
JustGrants: 5/25/22

Application Elements

- Proposal Abstract (critical)
- Proposal Narrative (critical)
- Budget Detail Worksheet and Budget Narrative (critical)
- Letters of Support from SCF Team (critical)
- Application for Federal Assistance (SF-424)
- Standard Applicant Information
- Indirect Cost Rate Agreement
- Financial Management and System of Internal Controls Questionnaire

Additional Application Components

- Tribal Authorizing Resolution (if applicable)
- Research and Evaluation Independence and Integrity
- Documentation of Advancing DOJ Priorities (if applicable)
- Letter from Research Partner (if applicable)
- Letter of Support from Community-Supervision Agency (if applicable)
- Letters of Support from All Other Key Partners
- Position Descriptions
- Documentation of Proposed Subrecipients (if applicable)

OJP Priority Areas

- BJA will give priority consideration to applications that:
 - include project(s) that will promote racial equity and the removal of barriers to access and opportunity for communities that have been historically underserved, marginalized, and adversely affected by inequality.
 - demonstrate that their capabilities and competencies for implementing their proposed project(s) are enhanced because the applicant (or at least one proposed subrecipient that will receive at least 30 percent of the requested award funding, as demonstrated in the Budget Worksheet and Budget Narrative) identifies as a culturally specific organization.
- **Applicants seeking one or more of the priority considerations must provide a sufficient explanation in the narrative.**

Reminder: Dual Deadlines

Applications will be submitted in a two-step process:

- Step 1: Submit an SF-424 and an SF-LLL at [Grants.gov](https://www.grants.gov).
- Step 2: Submit the full application, with attachments, at [JusticeGrants.usdoj.gov](https://www.justicegrants.usdoj.gov).

**NOTE: Submission deadline times for both Grants.gov and JustGrants are now 8:59 pm ET, not 11:59 pm ET as in past years.*

Read the solicitations carefully for further guidance.

Application
deadlines

Grants.gov: 5/20/22
JustGrants: 5/25/22

Application Assistance

Grants.gov

- Provides technical assistance with submitting the SF-424 and SF-LLL.
 - **Customer Support Hotline** – 800-518-4726 or 606-545-5035
 - Operates 24 hours a day, 7 days a week, except on federal holidays.
 - **Email**
 - <https://www.grants.gov/web/grants/support.html>
 - support@grants.gov
- Provides information on available federal funding opportunities for various federal agencies.

Application Assistance (cont.)

JustGrants Technical Support

- Provides technical assistance with submitting the full application in DOJ's Justice Grants System (JustGrants).
 - **Customer Support Hotline** – 833-872-5175
 - Monday – Friday between 5:00 AM and 9:00 PM ET.
 - Saturday, Sunday, and Federal holidays from 9:00 AM – 5:00 PM ET.
 - **Email**
 - <https://justicegrants.usdoj.gov/user-support>
 - JustGrants.Support@usdoj.gov

Application Assistance and Support (cont.)

OJP Response Center

- Provides solicitation support and general assistance.
- **email** - grants@ncjrs.gov
- **web chat** - <https://webcontact.ncjrs.gov/ncjchat/chat.jsp>
- **toll free** at 800–851–3420;
- **TTY** at 301–240–6310 (hearing impaired only)

The Response Center hours of operation are 10:00 a.m. to 6:00 p.m. eastern time, Monday through Friday.

Subscribe

- Subscribe to receive email notifications of new funding opportunities and other resources.
 - Sign-up to receive the twice monthly **JUSTINFO** newsletter as well as the weekly **Funding News** email.
 - Subscribe at <https://www.ojp.gov/subscribe> and be sure to select “Grants/funding” as an area of interest.

Resources for FY 2022 Grant Applicants

- OJP Funding Resource Center
<https://ojp.gov/funding/index.htm>
- DOJ Grants Financial Guide
<https://ojp.gov/financialguidedoj/overview>
- DOJ Grants Financial Management Online Training
<https://www.ojp.gov/training/financial-management-training>
- OJP Grant Application Resource Guide
<https://ojp.gov/funding/Apply/Resources/Grant-App-Resource-Guide.htm>

Quick Reference: Important Contacts



Solicitation Content Assistance

1-800-851-3420

Grants@ncjrs.gov

10-6 EST, M-F



Submit the SF-424 and SF- LLL

1-800-518-4726

Support@grants.gov

24 hours a day, 7 days a week



JUSTICE GRANTS SYSTEM

Submit full application

1-833-872-5175

JustGrants.Support@usdoj.gov

5-9 EST, M-F

9-5 EST, Weekends, Holidays

Data & Evaluation

Need detailed data on people, behaviors, and responses

Share with TTA provider for *your* benefit

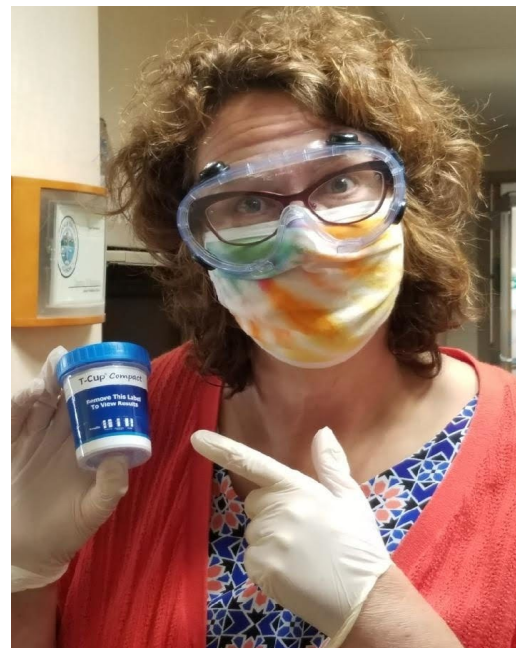
Calculate statistics for grant reporting

Work closely with your research partner



Program Coordinator

- Devoted full-time to the SCF project
- Primary contact person
- Monitors implementation
- Assures fidelity
- Collects data
- Coordinates team



You
Can't
Do
It
Alone



Technical Assistance



<https://scfcenter.org>

As little or as much as you need

Site reviews (virtual or onsite)

Ongoing consulting

Data tracking and analysis

Peer learning and support

Questions?

For More Information

For technical assistance with submitting the **SF-424 and SF- LLL** in **Grants.gov**, contact the Grants.gov Customer Support Hotline:

- 800–518–4726 or 606–545–5035
- Email support@grants.gov
- Visit Grants.gov customer support [webpage](#)

For technical assistance with submitting the **full application** in DOJ's **Justice Grants System (JustGrants)**, contact the JustGrants Service Desk:

- 833–872–5175
- Email JustGrants.Support@usdoj.gov

For assistance with any other requirements of this solicitation, contact the National Criminal Justice Reference Service Response Center:

- 800–851–3420 or TTY: 301–240–6310
- Email grants@ncjrs.gov

BUREAU OF JUSTICE ASSISTANCE

POST-AWARD GRANT MANAGEMENT AND FEDERAL COMPLIANCE (2022)

Ania M. Dobrzanska, State Policy Advisor

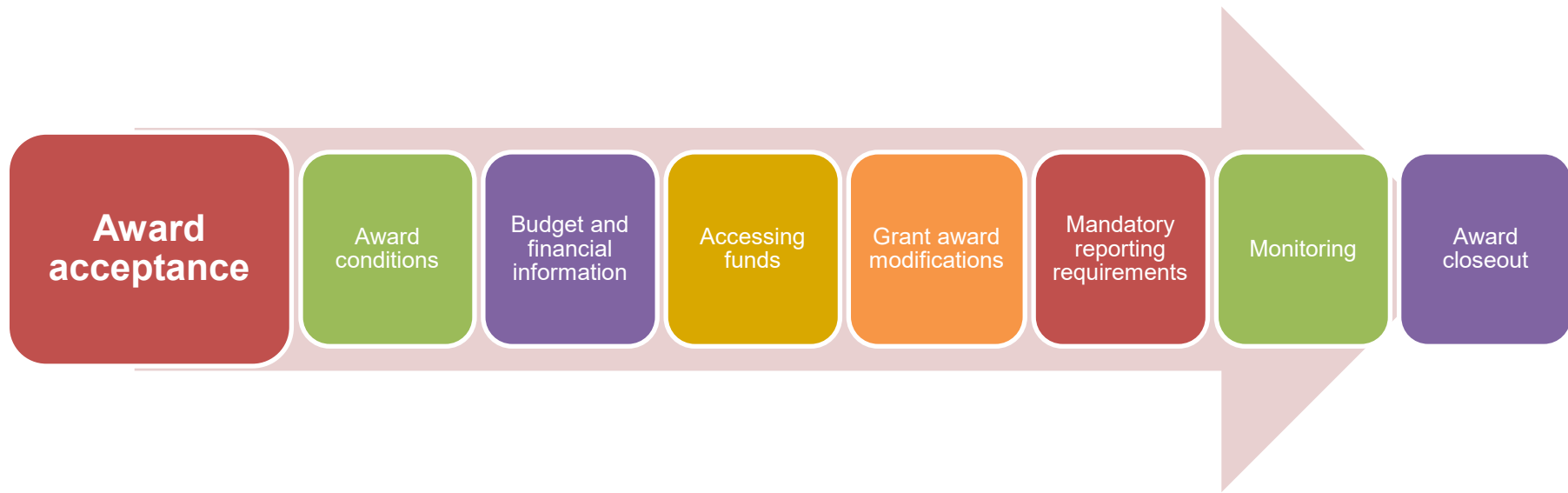
(202) 598-7476

ania.dobrzanska@usdoj.gov



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

Grant Management Post-Award



Award Conditions

- **Award conditions are terms and conditions that are included with the federal award.**
 - Please carefully review all award conditions. They are additional requirements covering areas such as reporting, prohibited uses of Federal funds, consultant rates, changes in key personnel, and requirements prior to ability to obligate funds.
- **Grantees are responsible for adhering to all award conditions. Consequences for non-compliance could include administrative or legal actions imposed on your organization by DOJ.**
- **Once an award has been accepted, any withholding conditions must be addressed before starting activities.**
- **In order to receive payment of funds obligated in DOJ's accounting system, recipients must be in compliance with the award conditions listed in the award document.**

Withholding Award Conditions

- **Grantees must review all award conditions for compliance and to see if any are withholding funds.**
- **Withholding Award Conditions** - These conditions place holds on funds for overdue reports and/or pending budget approval, other program requirements including Grants Financial Management Online Training, and documentation that was missing or incomplete during grant application review.
- **Withholding conditions must be resolved before your agency can obligate, expend or draw down award funds. (i.e. start activities). Your budget is a withholding condition – it must be cleared before you start activities.**
 - OCFO will review your budget. If modifications are needed, OCFO will return the budget to you in JustGrants via Grant Adjustment Notice (GAM). Financial Manager will be required to respond to the GAM from OCFO. Please check your SPAM folder to ensure you do not miss important e-mails.

Grants Financial Management Training

- Required training for Grant Award Administrator (previously known as POC) and Financial Manager (previously known as FPOC).
- Must complete training within 120 days of grant acceptance.
 - If the Grant Award Administrator and/or Financial Manager change, they will have 120 days to complete their training from the day they are added within the JustGrants system.
- Failure to comply will result in a withholding special condition.
- Must be completed every three years.
- Available online at <https://onlinegfmt.training.ojp.gov/>



Budget and Financial Information

- Recipients agree to read and comply with the financial and administrative requirements set forth in the current edition of **DOJ Grants Financial Guide** and **2 C.F.R. 200** Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
- All costs must be reasonable, allocable, and necessary to the project.

DOJ Grants Financial Guide (<https://www.ojp.gov/funding/financialguidedojo/overview>)

Accessing Funds

- **Reminder!** All withholding award conditions must be resolved and reports must be current to draw down grant funds.
- **Reminder!** Reimbursement requests are based on immediate disbursement requirements to be made immediately or within 10 days. If not spent or disbursed within 10 days, funds must be returned to the awarding agency.
- ASAP (Automated Standard Application for Payments) is a shared service provided by the Department of the Treasury for grant payments.
- ASAP allows organizations receiving federal funding to draw funds securely through pre-authorized accounts established by the agency issuing the payment.
- All recipients must register and have an ASAP account to access grant funds. [ASAP Registration Checklist](#)
- Questions about ASAP, contact the OCFO Customer Service Center Ask.OCFO@usdoj.gov or by phone 800-458-0786.

Unallowable Costs - See DOJ Grants Financial Guide (pg. 111)

- Costs that do not support approved project activities
- Costs incurred outside the project period
- Land acquisition
- Lobbying
- Fundraising
- Compensation for federal employees including travel
- State and local sales taxes
- Vehicles
- Entertainment
- Food and beverages
- Bonuses or commissions
- Client stipends
- Gift cards
- Prizes, rewards, entertainment, trinkets, or any monetary incentive

Subawards and Procurement Contracts

- **Grantees must determine if pass-through funds are considered subawards or procurement contracts.**
 - Proper determination is critical as **significantly** different requirements apply to entities based on determination. Per the Uniform Guidance, subawards are subject to monitoring by the recipient!
 - 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 (organization, evaluator/research partner), 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.

- **OJP guidance documents will help clarify the differences between subawards and procurement contracts:**
 - <https://www.ojp.gov/training/subawards-and-procurement>

Subrecipient Management and Monitoring Requirements

- The grantee should maintain written policies and procedures for its subrecipient award process to ensure it meets the requirements as laid out in 2 C.F.R. 200.303 and 200.332. These policies and procedures should have specific sections around pre-award and post-award responsibilities.
- The grantee should assess the risk of all subawards. The assessment should take into account their risk environment and the number, size, and complexity of subawards. The risk assessment should be used to determine the type of monitoring, scope, frequency, and timeliness of monitoring activities to be conducted for each subrecipient.
- The purpose of monitoring activities is to provide reasonable assurance that the subrecipient has administered the pass-through funding in compliance with the same laws, regulations, and the provisions of the award and that the required performance goals are being achieved.
- Grantees should document their monitoring activities in their subrecipient files, including monitoring reports and documentation of follow-up actions for any issues.
- For more information see DOJ Financial Guide (pgs. 115 - 120).

Procurement Overview

- All procurement transactions must be conducted in a manner to provide, to the maximum extent practical, open and free competition.
- Grantees should follow their organization's procurement guidelines as long as they do not contradict Federal regulations on procurement.
- For more information see:
 - DOJ Grants Financial Guide (pages 115 - 120)
 - 2 C.F.R. §200.317 - §200.326

Grant Award Modification (GAM): JustGrants

- A GAM is used to request project/budget changes, to include approvals for new subawards.
- **GAM types include:**
 - Budget Modifications
 - Scope Change & Program Office Approval
 - Project Period Extension
 - Sole Source (Non competitive procurement contract >\$250,000)
 - See DOJ Financial Guide (page 66)
- Once OJP makes a decision regarding the proposed change, the grantee is notified by JustGrants via e-mail.
- GAMs will not be approved if the grantee is delinquent with reporting requirements.

GAM: Budget Modification

When to submit a GAM:

- **10 % Rule** - For awards greater than \$250,000, you must submit a GAM if the total amount shifted between approved categories totals 10% or more of the total award amount (cumulative changes from the start of award).
- When you create a new budget category (allocation goes from 0 to x amt of dollars).
- Modification increases/decreases the amount used for Indirect Costs.
- The budget modification changes the scope of the project.
 - Examples include: (a) altering the purpose of the project; (b) authorizing use of a subcontractor or other organization that was not identified in the original approved budget, or contracting for or transferring of award-supported efforts.

Grantee must revise the web-based budget, provide computations for all costs, narrative justification for the revision, and clear explanation of changes from approved budget.

GAM: Program Office & Change of Scope GAM

Program Office Approvals:

- Changes to Personnel
- Changes in Consultant rates
- Publication Plan Submissions

Change Project Scope:

- Changing the purpose of the project
- Change to Target Population (i.e., adding new age group or gender).
- Changing the project site
- Experiencing or making changes to the organization or staff with primary responsibility for implementation of the award, contracting out, subawarding (if authorized by law), or otherwise obtaining the services of a third party to perform activities which are central to the purpose of the award
 - This includes adding a new subrecipient
- Changes in scope that affect the budget

GAM: Project Period Extension

- Must be requested through A GAM JustGrants at least 30 days prior to the current end date.
- Must be submitted at least 30 days before the end of the award, requires robust justification, and typically limited to one 12-month extension.

Please contact your State Policy Advisor for mandatory information that must be included with the request.

Reporting Requirements

Report Type	Reporting Period	Due	Help Desk
Federal Financial Report (SF-425)	<ul style="list-style-type: none"> • Jan 1 – Mar 31 • Apr 1 – Jun 30 • Jul 1 – Sep 30 • Oct 1 – Dec 31 	<ul style="list-style-type: none"> • April 30 • July 30 • October 30 • January 30 	OCFO Customer Service 1-800-458-0786 ask.ocfo@usdoj.gov
Semi-Annual Progress Report	<ul style="list-style-type: none"> • Jan 1 – Jun 30 • Jul 1 – Dec 31 	<ul style="list-style-type: none"> • July 30 • January 30 	JustGrants Support 1-833-872-5175 JustGrants.Support@usdoj.gov

Important Reporting Reminders

Federal Financial Reports (SF-425)

- Report funds obligated and/or expended, NOT draw down amounts
- Ensure funds that have been obligated align with approved budget
- Report for every quarter regardless of whether or not expenses were incurred

Semi-Annual Progress Reports

- Answers performance measure questions specifically written in the solicitation
- Provides BJA Grant Manager accurate snapshot of implementation
- Report must be submitted even if no activities

Subawards: FFATA Reporting

- Prime recipients of awards **\$30,000 or more**, report on any first-tier subawards of \$30,000 or more (effective October 1, 2010).
 - Reported at the 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, www.USASpending.gov.
- FSRS (www.fsrs.gov) 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.
- To help navigate the submission process, user guides, FAQs, helpdesk and online demos are available at www.fsrs.gov/resources.
- For more information about FFATA, see <https://ojp.gov/funding/Explore/FFATA.htm>.

BJA Compliance Monitoring

- BJA will conduct formal monitoring activities (enhanced desk reviews and in-depth remote monitoring/site visits) of award recipients to ensure awardee is conducting activities that were proposed and approved, and complies with award conditions.

Common Issues For Resolution (IFR):

- 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 GAM.
- 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 GAM submission to reflect current rate agreement.
- Lack of subrecipient monitoring policies and procedures that meet the requirements of 2 CFR 200.

Resources

- **Just Grants System**
 - Website: <https://justicegrants.usdoj.gov/>
 - Email: JustGrants.Support@usdoj.gov
 - Phone: 1-833-872-5175 5am to 9pm Eastern
 - JustGrants Training Resources: <https://justicegrants.usdoj.gov/training-resources/justgrants-training/grants-management-lifecycle>
- **OCFO Customer Service (contact for ASAP assistance and issues with financial reports)**
 - Email: ask.ocfo@usdoj.gov
 - Phone: 1-800-458-0786
 - DOJ Grants Financial Guide <http://ojp.gov/financialguide/DOJ/index.htm>
 - DOJ Grants Financial Management Training <https://onlinegfmt.training.ojp.gov>
- **ASAP Resources:**
 - [ASAP Registration Checklist](#)
 - [ASAP User Guide](#)
 - These documents and more can be found at: <https://justicegrants.usdoj.gov/resources/asap>