

JONATHAN:

Good afternoon and good morning and thank you for joining the informational webinar for the fiscal year 2022 Swift Certain and Fair SCF BJA grant. I'm Jonathan Kulick, co-director of the Swift Certain and Fair Resource Center at New York University. Also on with me is co-director Sandy Mullins. And joining us from BJA are Jessa Wilcox, the policy advisor for SCF, and Ania Dobrzanska, the state policy advisor for SCF. A bit of housekeeping. All the attendees will be on mute and there will be no video broadcasting other than these slides. If you would like to ask a question, please click on the Q&A button at the bottom of your screen, and one of us will be able to reply in that window or answer your question live. And there's an option to send anonymously if you don't want your name attached to your question. As you saw, we're recording this webinar and we'll make it available shortly. So, a bit of background. In the US, almost 6 million adults are supervised by correctional agencies and almost 4 million are on community supervision.

We know that community-supervision agencies are subject to high expectations. POs are expected to be both law-enforcement officers and social workers. Failure rates on supervision tend to be high, despite many initiatives targeting problems, so there's jail sanctions or revocation to prison; and there are high rates of reoffending. And the particulars vary from jurisdiction to jurisdiction and agency to agency. But what we see quite commonly are strained resources, where POs have large caseloads and the people on supervision have long conditions of supervised release, and there's limited ability to supervise, including testing for drug and alcohol use, if that's appropriate. And there are often limited treatment options and appropriate programming, exacerbated recently by the COVID 19 pandemic. There's also typically a lack of clarity. There can be many conditions of supervised release, but the rules can be unclear, such as "obey all laws." And because there are so many conditions, compliance can be hard to monitor and violations often go undetected.

So that sends a message to the person being supervised that the probability of being caught violating is low. And we know from behavioral research that we all tend to need a very high expectation of being caught to be deterred from doing something wrong. Think of how most of us behave when we're driving: You might see speed-limit signs or reminders of increased fines posted in certain zones. But the presence of a patrol car probably has the greatest deterrence effect because we know this means there's an increased chance of getting caught speeding. There also tends to be a lot of inconsistency: Even when violations are detected, how they are addressed can vary from officer to officer or office to office. Enforcement might look different based on resources such as jail-bed availability or treatment options, or just having an officer available to follow through. And sometimes there's no sanction because there are no appropriate intermediate sanctions available and there's nothing between ignore the violation or revoke.

So, an inconsistent response sends a message that the probability of sanction is even lower. And that encourages risk taking. What we might end up with is an unpunished string of violations that sends the message that violating is OK. When there is a response, it's often slow. The criminal justice system is in general slower than we'd like it to be, and the same holds in community supervision. When violations are detected and sanctioned, it's typically not quick. A court or parole board might not see someone for violating for weeks or even months. Warrants for absconding might not be served for weeks or months. And again, from behavioral research, we know that the closer in time there's a response to behavior—that is, a reward or a sanction—the more the behavior tends to be tied to the consequence. So, someone being sanctioned for misbehaving long after the fact is likely to see it as arbitrary and unfair.

And likewise, a reward for positive behavior delivered quickly is more likely to encourage that behavior in the future.

So that brings us to Swift Certain and Fair, which is a behavioral-response model for community supervision, specifically for people who are at high risk of failing on conventional supervision. It's based on principles of criminology and findings in behavioral sciences, which tell us that in order to shape behavior, whether that's deterring a negative behavior or encouraging a positive behavior, we need to respond in three ways: swiftly, so that the responses are perceived as tied to the behaviors; consistently, so that the responses are predictable and perceived as unbiased; and proportionately, the responses are perceived as fair. And if responses to negative behaviors are slow and random, then even severe sanctions won't deter. However, if the responses are swift and certain, then even modest sanctions can deter, which is what we're after. So, fairness or procedural justice entails being transparent, responding proportionally, and treating everyone equally

With regard to rewards, they can be as simple as verbal praise or reduced reporting; in this terminology, an incentive is the promise of a reward. So, I'm looking at the key principles of SCF. Above all, it's that we can encourage the behavior we want and discourage the behavior that we don't want. Now, every SCF implementations will be different in the details, but all share the behavioral-response principles that underlie this model. This has been challenging for many to implement under the COVID pandemic constraints, and we hope we will be out of them soon. But you can't be sure. We want to have that rules and expectations are tailored to the individual and are things that you care about. Again, if you have 40 conditions of release and 20 of them are things that really aren't that important or you're not going to be monitoring for, then it'd be better not to have them and not distract attention from the really critical ones. Regarding threats or promises, don't impose rules with the implied or direct threat of sanction if they aren't followed, or you can't or won't enforce or they won't have a consequence.

And likewise, don't make promises that you can't keep. It's good to have a formal orientation of participants into SCF—better than just handing somebody a piece of paper. It's good to have this orientation delivered by someone with authority, whether that is a judge or a probation or parole supervisor. We want to keep the language simple so that everyone involved understands exactly what is expected. And you want to have the person being entered into SCF supervision have the opportunity to ask questions and to acknowledge that they understand all what is expected of them. So, in practice the conditions need to be carefully monitored and actually enforced. During the pandemic, reduced physical contact required adaptations in many of these conditions. And when we say a “swift” response, well, it's swift depending on where you start from, typically meaning within hours or days. But that's in contrast to weeks or months, which is common in many places.

And you want to address every infraction by keep the sanctions modest. So, a sanction is not at all required and not in this RFP to mean in jail or even confinement. There are many alternative sanctions that can be effective in motivating behavior. And again, during the pandemic jail-confinement sanctions may be especially difficult or inappropriate to impose. And remember that the purpose of sanctions is to deter, it's not simply to incapacitate. And finally, a large body of research says that for many people, incentives are more effective than sanctions for modifying behavior.

SANDY:

Many of you may have heard of HOPE, which was the original evaluated application of Swift Certain and Fair model, and it was implemented with a seasoned probation department in Honolulu that used a risk-

and-needs assessment and evidence-based practices such as motivational interviewing and other cognitive-behavioral interventions. And some of you may know this as the Risk-Needs-Responsivity (RNR) model. HOPE was born out of this probation department's request to their judge that the court support their efforts by encouraging and rewarding positive behavior. And sanctioning misbehavior as it occurred, rather than letting many smaller violations add up to finally be addressed by just ending probation and sending the probationer to prison. HOPE was designed to support and enhance their RNR model rather than replace it. Almost all the jurisdictions we interact with through the SCF Center to some degree work with an RNR model, some limit SCF only to those who are moderate or high risk to recidivate. Many based their conditions on their assessed needs or the case plan built from their risk-and-needs assessment. By using SCF sanctions and rewards, often in addition to motivational interviewing, they have a mechanism to increase compliance. Jurisdictions report that their clients are showing up to their office visits, programming and treatment and showing up sober.

Jurisdictions are now applying SCF models to many different criminal-justice-involved populations. In Washington State, almost all parolees are supervised under an SCF model. In Arizona, two counties have applied the model to high-risk juveniles. In Honolulu, the birthplace of the HOPE program, they are now applying the model to a pretrial-supervision population. In Pennsylvania and Nebraska, they have applied SCF in prison. In Monroe County, New York, and in Cuyahoga County, Ohio, they're supervising people charged with gun possession. And in DeKalb County, Illinois, the model is being tested with a select group of high- and moderate-risk probationers who have been unsuccessful on traditional probation. Macon-Bibb County, Georgia, received an SCF grant to test the model on probationers charged with misdemeanor domestic-violence offenses.

Previous awards have been to states, counties, cities, tribes and territories. They have been received by courts, probation department, state correctional agencies, parole boards and law-enforcement agencies. SCF has been implemented in many states at a local or statewide level, an Indian nation, and Guam. The dark states here on the map have at least one jurisdiction or agency that we know of that received a BJA SCF award. The medium blue states have received other support for Swift Certain and Fair from BJA, and the light blue states have implemented SCF without a BJA award. And we assume there's probably others that just aren't on our radar.

Among these SCF awardees, there's also a broad range of target-population goals. We encourage you to be thoughtful in determining what's feasible for your jurisdiction. More is not necessarily better. Even if you hope to eventually serve more people in your program or expand the model within your system, it can be helpful to start with a smaller target to work out the details. And as you can see on the slide, BJA has awarded SCF grants to proposals with a broad number of target participants.

So, we've seen that this model can be generalized to a variety of populations, but that also means there's no one right way to apply the SCF. So, if you're working on your proposal, it's helpful to start by thinking about these questions. If you are the recipient of the SCF grant, you'll be asked to answer these questions in more detail in your action plan, one of your required deliverables. First question, which sounds easy enough but sometimes gets lost in project development, is what is the problem you're trying to solve? In Hawaii, drug crimes are aggressively prosecuted and probation sentences include long open prison terms that can be administered if someone fails on probation.

The developers of HOPE were trying to reduce drug use, triage who needed treatment, and ultimately reduce prison time. In my home state of Washington, we were far less aggressive in sentencing and

revoking our drug users. But we were spending over 15 million each year renting county jail beds for parole violators who were waiting to receive a hearing for their violation. We were trying to find a quicker and cheaper way to address violations. And in Macon-Bibb County, Georgia, they have a limited term of probation for their misdemeanor DV clients. So, they're trying to increase program participation and completion. Next, who is your target population? Logically, this should relate to your problem. If repeat violators are your problem, can you narrow this down? Some jurisdictions have targeted by type of offense or age. The New Jersey Parole Board tested the model for parolees with opioid use disorder, and Hidalgo County, Texas, implemented the model with young-adult probationers.

What is your jurisdiction, or who has the ability to give incentives and sanctions? In Washington State, the Department of Corrections has the authority in most cases to administratively sanction parole violators, up to full revocation. And in many states, the parole board has this authority. If you're a probation department, the courts will likely have this authority. And if the ultimate authority for sanctioning is with a court or parole board, what type of incentives or sanctions can be given by the supervising officers or agency without this authority? You should be able to articulate business as usual and how your proposed SCF program differs from this. Also, what are your resources and constraints? For instance, do you have a good mechanism to collect data or do you need to include some IT or data-collection support as part of your budget? Do you have jail or work-release space for short-term confinement sanctions if you will use those? Or do you need to identify nonconfinement options for sanctions? Overall, keep in mind that your proposal is relative to where you began.

You can read about how other jurisdictions have implemented a SCF model and it might help you develop your own thoughts around this. But your proposal should reflect the particular needs, authority, resources, and constraints of your jurisdiction. And I'm going to turn this over now to Jessa, to get more into the specifics about the application process.

JESSA:

Thank you so much, Sandy, and thanks everyone for joining us on this webinar. Before we go into some of the specifics related to grants requirements and how to apply, I just want to take a moment to give you a quick overview of the FY 2022 SCF solicitation. So, the goals of the SCF supervision program are to provide state, local, and tribal community-supervision agencies with information, federal grant funds, and training and technical assistance to improve responses to client behavior in accordance with the principles of swiftness, certainty and fairness, improve supervision outcomes, prevent recidivism, and reduce crime and incarceration in their jurisdictions. So, there is a link on this slide where you can access the full solicitation. And I apologize. It's not written out. I'm going to put it in the chat, a link directly to the solicitation for everyone to look at. Please read the solicitation fully and carefully to make sure you understand all of the requirements for applying.

The solicitation is open to state governments, units of local governments, and Native American tribal governments. Please note the definition of state in the solicitation includes the District of Columbia and the five US territories. So those jurisdictions are also eligible to apply. Applicants can apply for up to \$800,000 in funding to implement the SCF principles. We at BJA anticipate making five awards and the duration of the grant award will be 48 months, which will begin on or about October 1st, 2022. As you can see by the fact they included the URL for the solicitation, the solicitation is open and live right now. On the right side, you will see the two application deadlines. The first is May 20th for grants.gov and

then five days later on May 25th, the full application into JustGrants. And we'll get into details about those two ways to apply and as we go through next slide.

So, first the application elements. When you are applying, please review carefully all of the required elements and there's a checklist at the end of the solicitation that you can use to check off and make sure that you have included everything you can see on the slide.

Items that are marked as critical. Critical means if an application is missing an element that's identified as critical, which for the solicitation includes the proposal, abstract, narrative, budget detail, worksheet and budget narrative and letters of support from members of the applicant's SCF team, those applications will not be passed through to peer review. Many of you may know that applications are scored via a peer-review process, and BJA relies heavily on peer reviewers, scores, and comments when making funding decisions. So, if an application is not passed on to peer review, if it does not include these critical elements, it will not even be considered for funding. If an application is missing some non-critical elements, it could adversely affect the review and if an award is made, there may be special conditions that could delay awardees' access to or use of grant funds until the missing elements have been provided.

For your budget, when you're completing the budget worksheet and narrative, please pay attention to the project-timeline requirements in the solicitation. The first six months of the project are to support planning activities, including work on the required action plan, which as Sandy mentioned, is a deliverable under the solicitation. The following 30 months are for implementation activities and then the final 12 months would support evaluation activities only, such as data collection, review, and other evaluation-specific tasks. And please note this year, \$100,000 of the total budget must be spent on evaluation activities. In terms of the action-plan requirement: If awarded, grantees will have six months from when they receive final budget clearance to develop an action plan that describes in detail how you will implement and evaluate the SCF principles during the action-plan phase. BJA will withhold all but \$200,000 of the grant award; grantees will gain access to the remaining award amount after BJA has reviewed and approved the action plan.

Just note, keep in mind the action plan is not something you have to develop from scratch on your own. We have a template that will guide you through the action-plan process. And of course, we have the incredible support of Jonathan and Sandy to guide you through this process as well. As you're developing your project design and proposal narrative, I just want to note a few things. If you looked at the solicitation already, it requires a commitment to hire a full-time onsite program coordinator. The intent of requiring an onsite program coordinator is to ensure that this person is accessible to project partners and members of the SCF team, that is fully immersed in the day-to-day decision making, partner engagement, and coordination efforts that are required to successfully stand up this program. This includes a range of activities from developing policies and procedures to fidelity monitoring and training for supervision staff.

A question that we've received in the past from applicants and grantees is what exactly we mean by onsite and what level of flexibility there is in meeting this requirement. For example, it may be the case that there are five field offices implementing SCF responses, and it would be appropriate for the program coordinator in this scenario to be located at the central office, so as to coordinate efforts across all five offices. There is some flexibility with applying this requirement in order to meet the needs of a particular jurisdiction. And we're always willing to answer questions and troubleshoot to figure out

the best approach for your jurisdiction. And the solicitation also indicates that the program coordinator should be housed in the community-supervision agency. While in most cases, a community-supervision agency will likely be the best home for the program coordinator, we recognize that the community-supervision agency may not be the lead applicant driving the project forward. So again, there's flexibility here as well. Applicants have discretion in determining which agency would be the most suitable to house the program coordinator, based on the proposed project design and the roles and responsibilities of the partner agencies.

There are several additional components to be included in the application. If you identify the research partner in your grant application that you intend to work with, you'll need to submit a letter from the research partner demonstrating commitment to the project. And if the community-supervision agency is not the lead applicant, you will need to include a letter of support from the community-supervision agency, documenting the role they will play on the project and demonstrating their commitment. Letters of support from key SCF partners, and apologies that should have been marked critical on this slide. But I'll tell you now, it is a critical application element, meaning it must be included for your application to proceed through to peer review. And you can see some examples of key SCF partners listed in this solicitation. You will need to provide position descriptions for all of the key roles for your project, as well as resumes for staff in these roles.

And finally, you will need to submit documentation of any proposed subrecipients, if applicable for your proposed project. For those of you who are familiar with BJA solicitations, every year, the Office of Justice Programs, which is the part of DOJ that BJA sits in, designates priority areas as one of the many factors that BJA will consider when we make our funding decisions. However, receiving a priority consideration is in no way a guarantee of getting an award. The two priority areas this year, you see them on the slide. The first is for projects 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. The second is for applications that demonstrate that their capabilities and competencies for implementing the proposed projects are enhanced because the applicant, or at least one proposed subrecipient that will receive at least 30% of the requested award funding, identifies as a culturally specific organization.

And the solicitation itself will include a lot more information about these priority areas. One thing to note, applicants who are seeking one or more of these priority considerations must include a sufficient explanation in the narrative. There's not a separate attachment this year. It has to be woven into the narrative.

I'm just going to briefly fly through some of these slides because my colleague on here will also be talking about this. But just how, in fact, to apply, as we did last year, there are two separate application deadlines. The first step is to submit the application for federal assistance. I refer to a Standard Form-424 and the lobbying-activity disclosure form. That's the SF-LLL at [grants.gov](https://www.grants.gov) by May 20th. And then the second step, five days later, that's when you will submit the full application, including all attachments in the JustGrants system. This is your product narrative, your budget and all the other required attachments, and this is due on May 25th. Please note this year the submission deadline is 8:59 p.m. Eastern time. So last year it was midnight. So just please note it's 8:59 p.m. Eastern time.

We recognize that applying for grants can sometimes be confusing or applicants can experience technical difficulties. So we're pleased to offer assistance with both step one and step two of the

application process. On this slide, you'll find the contact information for grants.gov help. What's great about this is customer support is open 24 hours a day, seven days a week. And on the next slide, you'll see that we offer the same type of assistance for JustGrants technical support. Notice there's slightly shorter hours of operation, but still 5 a.m. to 9 p.m. Monday through Friday Eastern and 9 a.m. to 5 p.m. Saturday, Sunday, and federal holidays. And we also have contact information for the OJP Response Center. There are some additional resources that you can access as you work through your application.

And all of these, as you can see, are available online. And here's a slide with the important contacts all in one place. Just one word of advice. Please don't wait until the last minute to apply. People could have unforeseen technical difficulties, so take advantage of the resources and the help, but don't wait until the last minute, apply early and read all the instructions in the application. I'm going to turn it back over to Jonathan.

JONATHAN:

So, this brings us to data and evaluation. There are multiple needs for data on your program. As the training and technical-assistance provider, we like to get the implementers' data to help us understand what's happening in their systems so we can help them. So, should you get an award, we want to be able to *help* you, not to monitor you. This year there's also, as I just mentioned, an evaluation required. And whether you're conducting it yourself or have a research partner, you'll need data for the evaluation. This also serves for sustainability planning and for mid-term and final analysis and the report. There's also BJA's now-semiannual reporting on program performance. And so the PC's going to be collecting data for all these various purposes. It's good to think about your plan upfront so you don't find yourself when the time comes to report the data, having to go and collect them. And this will put some demands on your I.T. and your case-management systems, depending on how well integrated they are with various stakeholders and partners you may have in your implementation. So think about the I.T needs and include time for I.T people or software in your proposed budget if needed.

And this is a real-life program coordinator. As just mentioned, the program coordinator is essential for and indeed required for implementing what can be some fairly complex programs, so needs to be devoted full time to the SCF project. The coordinator is going to be the primary contact person for us as a data provider, for the research partner, and really for all of the stakeholders. Now some grantees will have essentially all of the operations housed within one agency, but others may have courts and probation departments and law-enforcement agencies and community-based service providers. And so the coordinator there is really essential. The coordinator will also monitor implementation. So, for example, should you have random drug testing, is the drug-testing schedule working with the tester's availability? The coordinator also assures fidelity to the implementation plan as elaborated in the action plan. So, for example, if there is a scheme for promising rewards, are they actually being issued when the behavior requirements are met?

SANDY:

You've heard Jessa and Jonathan talk about partners and partners of the program. And it'll vary, but essentially, we usually see something like this. The slide has some examples of partners that you will likely need to coordinate with. Not always. The application requires letters of support from key partners, though, and should you receive the grant, you will need to engage these partners in the planning process. From previous grantees, we know that working with a broad array of partners is one of the more challenging aspects of implementing their SCF projects. But it's also one of the most beneficial.

These projects create a space in everyone's regular course of business for greater communication and collaboration, and often we see that through this process, the partners identify practice improvements that get applied beyond their SCF implementations. If funded, you will need a process to gather input from all partners throughout the planning and implementation process.

And this allows you to do more-rapid problem solving and make adjustments as you as you determined that they are needed and the coordinator will need to be able to negotiate diverse partner needs and expectations while keeping the focus on the principles of SCF. So, if you get the grant, the SCF Center—Jonathan and I—will be your technical-assistance providers. We'll walk you through your action-plan development and will provide training as needed. And then every step of the way, whether it's strategizing or action planning, starting up, fidelity monitoring, or reporting, we will be with you to answer your questions and help you navigate. If some of this is new to you, it really is little or as much as you need. There are some grant requirements such as the action plan that we've discussed several times that we will interact with you for sure on at the beginning, but then we also do workshops or trainings and site visits, once it's safe for us to travel and hopefully it sounds like we're getting there.

JONATHAN:

So, if you have questions, you can put them in the Q& A or we already have one in the chat. And if we can't get to answering it live or in text right now, we will make sure to have that answer in the package with the recorded webinar and the transcript will be available soon. Jessa, I don't know if you can see the question that says, "how does BJA view proposed public-private partnerships for this opportunity?"

JESSA:

So the lead applicant has to be a unit of the state, local, or tribal government, as I said. I'm putting a link to the OJP Grant Application Resource Guide. There's more information about subrecipients in general, but the lead applicant has to be a unit of government.

JONATHAN:

So again, we will continue to take questions. But if there are none other right now, I will turn the floor over to Ania with lots of important details.

ANIA:

My name is Ania Dobrzanska, the state policy adviser, and here we are providing some helpful links on the application process and for any other requirements of the solicitation for the National Criminal Justice Reference Service Response Center. Next slide. And again, I said, I'm Ania Dobrzanska and once you're awarded, I will be your primary contact on grant management issues. Next slide. Today, I will try to provide you with all the information you need on what will happen and what will be required from you once you're awarded. And I will just quickly add that I will be the one who will be reviewing all your applications once they go through the peer review process. And I will be checking the application for all the mandatory attachments. So, I will ask you to please properly name all the attachments to ease the review process. And I will also review your budgets to make sure that all costs are allowable and necessary and that you show all the computation. Next slide.

When you're awarded, you will notice that you have award conditions on your award. Please carefully review all those conditions. Some of them are standard for all grant recipients, and then there are additional requirements for your specific program and other areas that cover reporting requirements. Prohibited uses of federal funds, consulting rates, changes in key personnel and requirements prior to

ability to obligate funds. And of course, grantees are responsible for adhering to all award conditions, and consequences for noncompliance could include administrative or legal actions imposed on your organization by DOJ. Once an award has been accepted, you may have withholding conditions that must be addressed before starting activities. In order to receive payment of funds obligated in DOJ accounting system, recipients must be in compliance with the award conditions listed in the award document. Next slide. Some of your conditions may be withholding, which means that you will have funds on hold until you comply with these conditions.

An example for withholding conditions may be for overdue reports or pending budget approval by OCFO and other program requirements, including mandatory credits, financial-management training, which is online, and any documentation that you do not submit with your application or is incomplete. Withholding conditions must be resolved before your agency can obligate, expend or drawdown award funds. That means you cannot start any activities until all your withholding conditions will be cleared. Your budget approval is a withholding condition and it must be cleared before you start activities, which means that OCFO must approve your budget and issue an FCM, which is financial clearance before you can start any activity. And as I mentioned, OCFO of your budget and if they find any issues or modifications are needed, OCFO will return the budget to you in JustGrants through a grant award modification (GAM), which I will talk about later. And assigned financial manager will be required to respond to it again from OCFO.

It's very important for you to make sure that you check your spam folder to ensure you don't miss any important emails from just friends or us. Next slide. As I mentioned, financial-management training is required. The required training is for grant, award administrator and financial manager. If you have a change of contact to the award administrator or financial manager, those new contacts will also be required to complete this training. This training must be completed within 120 days of grant acceptance and will be required every three years. Failure to comply will result in a withholding special condition which will be removed once you complete the training. And this training is available online. You will have different modules which you can take at your own pace. Next slide. Recipients agree to read and comply with the financial administrative requirements set forth in the current edition of the DOJ Financial Guide, which will be your Bible once you're awarded, and we'll have all the answers that you will need to all the questions as well as 2 C.F.R. 200 Uniform Administrator Requirements, Cost Principles and Audit Requirements for Federal Awards. And as I've mentioned before, all costs must be reasonable, applicable and necessary to the project. And again, once you submit your budget, please make sure that you have a breakdown of all the costs. Next slide. The reminder, as I've mentioned before, before you access funds always for work conditions must be resolved and reports must be current to draw down any grant funds. Reimbursement requests are based on immediate disbursement requirements to be made immediately or within ten days, if not spend or disbursed within ten days, those funds must be returned to the awarding agency. Automated stated application for payments is online. It's a shared service provided by the Department of Treasury for grant payments. It allows organizations receiving federal funding to draw on funds securely through three authorized accounts established by the agency issuing the payment. All recipients must register and have an asset account to access grant funds.

And here I provided a number for an email for OCFO customer service that you can contact for any issues with registration or problems accessing your funds. Next slide. Some of the unallowable costs include costs that do not support a 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. You can go to the DOJ Grant Financial Guide on page 111 to find out more information on what costs are not permitted. Next slide. Now this is important whether or not when you're doing your budget, you designate a third party as a subaward versus a procurement contract. A checklist determines if pass-through funds are considered subawards or procurement contracts to properly label them in a budget. Proper determination is critical.

Significantly different requirements imply two entities based on determination for the unit for guidance. The boards are subject to monitoring by the recipient, which means you as the recipient will need to have a system in place to conduct oversight of all the subawards. 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 or research partner, that delegation will generally be considered the subaward. Most entities on your awards are programmatic and substantive and are therefore should be classified as subawards. Here you have a link on the bottom with important information and a checklist to help you determine if, in fact a third party is a subaward or a procurement for contract. Next slide. As I mentioned before, if you have a subaward, you will be responsible for oversight. The grantee should maintain written policies and procedures for its recipient award process to ensure it meets the requirements as laid out in 2 C.F.R. 200, 303, and 332. These policies and procedures should have specific sections around award and post-award activities. Responsibilities. The grantee should assess the risk of all subawards. The assessment should take into account the risk environment and a number size and complexity. The risk assessment should be used to determine the type of monitoring that you will do. Scope, frequency of monitoring and timeliness of monitoring activities to be conducted of each recipient. The purpose of monitoring is to provide a reasonable assurance that the separate subrecipient has administered the pass-through funding in compliance with the same laws, regulations and provisions of the award, and that the required performance goals are being achieved. Grantees should document their monitoring activities in the recipient file, including monitoring reports and documentation of follow up action for any issues. Of course, you can go to DOJ Financial Guide for more information. Next slide. When it comes to procurement contracts, all procurement transactions must be conducted in a manner to provide to the maximum extent practical, open and free competition.

Grantees should follow the organization's procurement guidelines as long as they do not contradict federal regulations on procurement. And of course, here's information on where to go, for more information on procurement. Next slide. Throughout the grant, you may need to request changes to your program, which is understandable. In order to do that, you'll submit grant the word modification in just credits. And we have several different types of things, including budget modification, scope change and program office approvals. When you change the scope or any programmatic activities project period extension, if you need more time to complete your activities and sole source which is noncompetitive. Once OJP makes a decision regarding the proposed change, the grantee is notified by JustGrants through an email and of course, as a reminder, no grant will be approved if the grantee is not compliant with reporting requirements. Next slide. For a budget modification when to submit again, well, we have a 10% rule for awards greater than \$250,000.

You must submit again if the total amount shifted between approved budget categories totals 10% or more of the total award amount. And this includes cumulative changes from the start of the award. Also, when you create a new budget category, for example, if you did not allocate any funds for travel and at some point you would like to allocate funds for travel that would require again. Also, when modification increases or decreases the amount used for indirect costs. The budget modification changes the scope of projects as well. Examples include altering purpose of the project, authorizing use of a subcontractor or other organization that was not identified in the original approved budget or contracting or for transferring of award supported efforts. Grantees will be required to revise the web-based budget, which is going to be your main system for submitting your budget in the application and provide computation for all cause narrative justification for the revision and clear explanation of changes from the approved budget.

Next slide. You will also have program approval. And that would include any changes to personnel, changes to consultant prep rates and publication plan submissions. There is still that project scope would include any changes to the purpose changed target of population project site and experiencing or making changes to the organization or staff with primary responsibility for implementation of awards. Contracting out or subawarding or otherwise. Obtaining the service of a third party to perform activities which are central to the purpose of the award. For example, if you would like to enter into a subaward that was not identified in the budget, you would submit a project change scope. Next slide. During the grant, you may notice that you need additional time beyond your grant period. You may request a project period extension through again JustGrants at least 30 days prior to the current end date. The grants must be submitted at least 30 days before the end of the award, but you can submit it as soon as at least six months prior to your project date, because that would give us a better estimate of your projected timeline for the additional time.

The request would require a robust justification and typically limit it to one 12-month extension. And once you will meet that extension, you can email me your state policy advisor once you're awarded. For information on what needs to be included in the request. Next slide. And here are your reporting requirements. You will be required to submit quarterly financial reports and semi-annual progress reports in JustGrants, which will include a set of questions. Next slide. This an important reminder for financial reports. You should report funds that are obligated and not end or expended and not draw it out within months. You must ensure that funds that have been obligated align with approved budgets and report for every quarter regardless of whether or not expenses were incurred. For your semi-annual progress reports that will include a set of questions in JustGrants, you would answer a performance measure question specifically written in the solicitation.

These reports provide us with an accurate snapshot of implementation and see how you're progressing and report must be submitted even if you had no activities. This this also applies to your financial reports. Next slide. Now with regards to subawards, you will be required for forward reporting if you have subawards that is \$30,000 or more you are required to report on that subawards, at the end of the month following the time that the subaward was made. But is the Federal Funding Accountability and Transparency Act, which requires information on federal awards to be made available to the public, is single searchable website. FSRS is a sub word reporting system used to capture and report subaward and executive compensation data regarding the first step words to meet the up reporting requirements and who are provided additional information that you need if you have additional questions or need help with product reports. Next slide. Now BJA will conduct formal monitoring activities through

enhanced desk review and in-depth remote monitoring or actual site visit of award recipients to ensure IT awards conducting activities that were proposed and approved and complies with award conditions.

Now here are a list of common issues for resolution as a finding by us that state policy adviser or OCFO unauthorized obligation of funds in violation of grant withholding special conditions and or prior to budget clearance. As a reminder, you cannot obligate any funds before your budget was approved or if it's holding conditions that you may have on your award, are removed. Incorrect classification of subaward as a procurement contract. Again, please refer to this link that has really helpful information, including a checklist to determine if it is a subaward or a procurement contract. User funds for consulting raised in excess of \$650 per day, which amounts to \$81.25 per hour without explicit prior approval from BJA through GAM. Accounting policies and procedures are not documented or need improvement and a lack of tracking award expenditures by approved budget category. Indirect cost rate charge improperly or the rate expired and lack of budget notification submission to reflect current rate agreement.

If you have indirect costs in your budget, you will be required to submit your agreement with the application and lack of subrecipient monitoring policies and procedures that meet the requirements of 2 CFR 200. Next slide. Now here is a page with all the resources that you need for adjustment systems, OCFO for customer service that will handle all your financial issues and financial reports. They will bring you all the records and asset resources to access your funds. Now, this concludes my portion of the presentation. I hope it was helpful. And again, once you awarded, I will be your primary contact. So I will be very happy to answer all your questions.

JONATHAN:

Thank you, Ania, and thank you, Jessa and Sandy and everyone who has attended. As I said, the recording of this webinar and transcript and the slide deck will be available from the solicitation page soon. And we look forward to getting your proposals and to having you join the SCF grantees next year. Good luck. Thanks very much.