

DARYL FOX: Good afternoon everyone, and welcome to today's webinar on the Project Safe Neighborhoods FY 2021 Grant Announcement posted by the Bureau of Justice Assistance. At this time, I'd like to introduce today's presenters, Kate McNamee, Senior Policy Advisor with BJA; Steve Fender, Senior Policy Advisor also with BJA; and Brandy Donini-Melanson, Program Manager with the Executive Office for United States Attorneys. Kate is going to be starting things off today. Kate.

KATE MCNAMEE: Thank you so much, Daryl. And good afternoon, everyone. As Daryl said, I am a Senior Policy Advisor at BJA. My name is Kate McNamee and I'm very glad you could all join us today to discuss this year's PSN Formula Grant Program Solicitation. So our objective today is to prepare you to successfully apply to the PSN Formula Grant Program. And for those of you who are new, we will describe the program's purpose, goals and objectives, confirm who is eligible to apply, provide guidance related to PSN funding allocations for 2021, go over the new application submission process, and share resources that should help you through. Our colleague, Brandy Donini-Melanson, will then share some helpful guidance from EOUSA's perspective and then we will open things up for questions. And a big thanks to my colleague, Steve Fender, for joining me today for the BJA portion.

The PSN has played a major role in DOJ's crime reduction efforts since 2001. It has spanned four presidential administrations and has maintained the same objectives, creating and fostering safer neighborhoods through partnerships of local, state, tribal, and federal law enforcement with the communities they serve to address violent crime challenges. And it is national in scope with a presence in all 94 federal judicial districts. The goals of the program include building what we call a PSN team, made up of formal working partnerships among all relevant law enforcement agencies, community support organizations, and community leaders to address violent crime while engaging and supporting the communities they serve.

So PSN is not meant to be a cookie cutter program. The strategies used by PSN teams must be tailored to the needs and priorities of their community. And the optimal outcome is an increased ability to focus on the specific people and places driving violent crime, while supporting the community's efforts to prevent further violence. To accomplish these goals, PSN teams are expected to implement at least one evidence-based strategy to address their community's most pressing violent crime issue, as well as use PSN grant funding to directly support those activities with the input of all PSN team members. Eligible applicants are certified by Project Safe Neighborhood--or sorry. Excuse me. Eligible applicants are certified Project Safe Neighborhoods team fiscal agents for the federal judicial districts. So that means all fiscal agents who are applying to PSN must be certified by the relevant district United States Attorney's Office.

The solicitation lists a number of entities that would be eligible to be fiscal agents and that's highlighted above in this slide. But of note, BJA recommends that districts consider using their state-administering agencies just because SAAs may better leverage state resources to assist in the implementation of the district's PSN initiative. And they also tend to be familiar with the grant funding administrative requirements under PSN. And of note,

if an applicant is a fiscal agent or other entity has not received the required certification by its local USAO, the application will not be considered for funding, so that's a huge point to keep in mind. And all recipients and subrecipients must forgo any profit or management fee. And that is a BJA-wide requirement.

So, our plan for this year is to make 93 formula awards. Each federal judicial district is eligible to apply for a funding allocation based on its violent crime rate and its population size. And when the solicitation was released a few weeks ago, we advised that districts should plan their budgets based on last year's allocation, since the funding allocation table had not been calculated by that time by the release. However, we are glad to say that we've been advised that the funding allocations should be available next week. They will be posted on the BJA website. We will ensure to work with our partners at EOUSA to make sure that they are disseminated. And that table will--no doubt, that allocation table will provide exact guidance on how much each district will receive. So, we will share that in real time with you so that you are working with real numbers when you submit.

A couple of notes as you move forward in your budget planning is, what is fiscal agents--fiscal agents may use up to 10% of the allocation to support their administration of the award and has--as has been the case for the last couple years, the authorizing legislation requires 30% of PSN funding to be used to support gang task force related activities. And for those of you who are unfamiliar with this requirement, I highly recommend to you look at the FAQ document we produced on this Gang Task Force Set Aside. It was located in appendix B of last year's solicitation and has not changed, but it's also located on the BJA website at the link we just posted in the chat. And BJA expects to make awards for projects of up to 36 months, beginning on October 1, 2021.

As with any grant award, there are deliverables associated with PSN. As part of your activities as a PSN team, DOJ will expect that you produce and implement this PSN strategic plan, and this plan should focus on the district's PSN strategy as a whole, not just the grant-related activities, and more guidance on this deliverable will be available within the next month. And a template will be provided by DOJ to PSN teams to support the fulfillment of this requirement. We also require periodic reports on the grant's progress and performance metrics for BJA administration. And if your PSN team includes a funded research partner, then we would also require a report on the evaluation and findings of your PSN intervention at the conclusion of the grant award. And we require that so that we can share your good work and findings with the PSN and law enforcement community as a whole.

So this is big news. This year we have a new grants management system and a new two-step grant application process. This means that you have two deadlines to keep in mind. The first is a Grants.gov deadline to submit your SF-424 and lobbying disclosure form. The second deadline, applicants submit the full application into the JustGrants system. Both of these steps are required and there is further guidance available in the solicitation on the process. In addition to the solicitation, there's a--there's JustGrants guidance available on OJP's website, including a checklist you can follow to ensure you complete your application correctly.

And now these are the important dates to remember. We release the solicitation on May 3rd and the Grants.gov deadline for your SF-424 and lobbying disclosure is June 22nd. The JustGrants submission deadline for your full application and attachment is July 6th, 2021. I realize many of you are new to JustGrants. The intent of this new system launched last October was to streamline the grant award and management process. It was also intended to enable users new ways to manage their information in the system, as well as give users the ability to use a web-based budget detail worksheet that will be used DOJ-wide. A streamlined validation process also helps--help us clear your budgets more quickly. To submit the application in JustGrants, you will identify the forms needed to support your application, complete the budget form, complete the application materials, including certifying the accuracy of the captured information in the system, and then press the submit button.

Now, optimally, that is how it's supposed to go. However, new systems have their challenges, and should you run into any trouble, there is support available in the way of tutorials, background materials, and live support to enhance your interface with JustGrants. And this is the link to access those resources. As far as your application itself is concerned, we are requiring an abstract for your proposal as this assists DOJ in quickly identifying the grant strategy, your key partners, target enforcement areas, and if you have a research partner, all key elements for us.

Next slide, please. And a question-based guide to putting your program narrative together is included in the solicitation and provides you with all of the areas that need to be addressed in your submission. It is especially important to detail your plans for the Gang Task Force Set Aside, as we need to track that for reporting and accounting purposes on our end. And as accountability remains a key component of PSN, performance metrics should be described in the narrative as well as how you will measure and report your outcomes as required by BJA and DOJ. And more information on performance metrics as well as links to the performance metrics that we collect are in the solicitation. And now, I will turn it over to my colleague, Steve Fender, to go over key budget and sub-award considerations. Steve.

STEPHEN FENDER: Thanks. Thank you, Kate. Good afternoon, everyone. And I'm going to talk about budget and a few other items related to that. You're probably all familiar talking to me about budget if you're previous grantees. So, we have a few things to highlight here. So in drafting your budget for your 2021 PSN application, a couple of things to consider. First, when submitting the budget this year, you will need to submit using the new online budget form in JustGrants, not the previously used budget attachment document that we're all familiar with. I recommend viewing the training linked on the slide before submitting and you can also access this training through the JustGrants website in the section that includes training materials. I went to a demo this morning on it. It looks pretty straightforward. I think it's going to be a good system for us. So, please be aware that that is a different process for submitting your budget for the 2021 application.

Second, for those that plan to reimburse indirect costs, be sure to include these expenses correctly on your budget and also submit with your application your approved indirect cost

rate or the signed de minimis form. I also confirmed this morning that the indirect costs, if they're in your budget, will calculate as it did in the previous attachment. Third, when completing the budget, please ensure that your budgets include only allowable expenses and detailed budget narrative descriptions for all costs. We must have line item explanations for each expense for awards and subawards that you--we'll talk about later. Finally, be sure that you clearly differentiate fiscal agent costs from any subawards that you have, that you may be submitting in your budget narrative at the time of application. For 2020--for 2021, if you have any subawards that you have been decided at the time of application, please include that information in the budget at the time of submission. So new budget form, clearly make that--if you're going to have programmatic expenses in your budget, make sure you clearly make the connection in the narrative to violent crime reduction and closely describe all costs, line item costs in the budget using the new form.

On this slide, we present a lot of details for your review regarding subawards and subcontracts and I realize you won't be able to see it all now but when you read the slides later, if needed, I hope you'll find it helpful. What's important to remember on this--of this information is that the two funding mechanisms are different, subawards and subcontracts, and you should be aware of the key differences before entering into agreements with grant funds. You must determine if your pass-through funds are considered subawards or procurement contracts. And this--following this guidance here will help step you through that decision. It's the first link on the slide near the bottom. We provide access to training for pass-through entities that covers a whole variety of topics related to subawards. There's information here on subawards and subaward monitoring that is required, and the link also includes a sample checklist for monitoring. So it's my recommendation, if you make subawards now or intend to make them with the 2021 PSN solicitation, you take a look at this link. There's really good resources here for monitoring, oversight, and otherwise.

In the links at the bottom of the page, we provide three resources. The first is a toolkit that guides you--guides you through the decision whether the agreement is a subaward or subcontract, and the second is a checklist to use while making your decision. If you have any questions about whether your proposed agreement is a contract or a subaward, please be sure to review these resources carefully. These are very good. I send them out all the time and I highly recommend taking a look at these if you have any questions about that. Finally in the third link, we provide guidance for noncompetitive procurements or sole source for your review while considering submitting your application. If you're considering a noncompetitive procurement, please review this closely and let me know if you have questions. We typically see noncompetitive procurements in law enforcement technology. This is very common. So please be aware of these requirements and think about the simplified acquisition threshold as you engage in a contract for--or propose entering into them as far as your application. And certainly as always, call me if you have questions as it relates to sole source.

Okay. In the past year, we have experienced a number of unusual circumstances that delayed access to subaward approvals. So I thought it'd be important to talk briefly about how subawards can be more quickly approved. And I guess the first point would be that

review and authorization of subawards are still required for post-award decisions for the CFR, and we'll continue to move those as quickly as we can now that we're beyond what was a long barrier to our ability do that. So to start, we need two documents for all subawards for those that are considering making subawards. For program activity, one is a line item budget and the other is a summary of the proposed activity. When preparing your budgets, please be sure that costs are allowable and are clearly related to violent crime reduction. If you have a--if you have a question about the cost and--or you think that you need some additional explanation to make the connection, please include that information in the budget narrative that, you know, that will streamline the review. During your review, you should consider how the expense you plan to fund relates directly to violent crime reduction and also to your program goals and objectives.

Food and program incentives, such as trinkets and gift cards, are generally not allowable expenses and should be avoided in your budgets. Also, typically, we do not see the use of administrative costs for subawards. However, if you want to allow administrative funds to be used for subawards, that would be part of the 10% cap for the total award that will need to be deducted from the fiscal 10% of allowable administrative costs previously referenced by Kate. Indirect costs are separate and distinct from administrative costs. So those would still be allowable at an approved rate for all subawards. The most important thing to remember for budgets is that we need clear line item costs with detailed explanations and the cost should be calculated correctly before sending it to BJA for review and approval. Please avoid combining costs into a larger project, so we're going to need to detail review each line item expense for all subawards.

For the subaward summary, so we have the budget and then a summary. So the summary should include a description of the proposed subaward program, you know, following the basics of the what--the who, what, when, where, and why. And explain the explicit violent crime connection for all costs. A good practice in your subaward summary is to also explain the selection committee decision for funding in the summary since that is a requirement for all funding decisions. So as you think about--as you prepare your application, and if you have subawards that you want reviewed and approved, it will be of utmost importance for you to indicate the subaward selection and funding decisions at the time of application for any subawards that you plan to submit. In addition, please be sure to clearly indicate in your summaries how the 30% Gang Set Aside that Kate mentioned is being met. This is the key requirement we must be sure to document in compliance. So if you submit your subaward documentation with your application or post-award, we want to be sure that we can clearly see that 30% of the funding, less the administrative funds, because this usually comes up. So take off the admin, take the 10% off and then 30% of that number is required. So please document that in your subaward summary.

Finally and importantly in my view, there's no 1373 requirements for the PSN awards or subawards for 2021 or the previous awards. That requirement has been removed so that documentation will no longer be needed. So you don't need to look for that in your '21 application. And for 2019 and '18, we will no longer require that for any subawards that still--or have pending approval. Okay.

We are near the end of the BJA portion of the presentation, but I want to make sure that you have our contact information. This is Ms. Kate--Ms. Kate McNamee's information here for those who need it. And many of you have my contact information, but here it is if you want to call or email to talk about your 2020--2021 application or other things. Okay. While developing your application materials, if you have questions about the process, please contact the Office of Justice Programs Response Center using the information you see here. In particular, if you are having problems submitting by the deadline, the deadline to do the system, JustGrants system problems or Grants.gov problems, please also contact the help desk for assistance. We're tracking that closely. We understand it's a new system. We want to be mindful of that.

So--and it's also--this is also a good opportunity to provide a reminder to get your application in early, certainly through the Grants.gov portion, and then as we provide the final allocation numbers, which we hope to provide next week, you'll be ready to enter that information in the 424, so please prepare your application early and don't wait until the end. Our systems typically slow down and there are problems submitting, so if you tend to submit, please do--please be prepared to submit early. But if you do have problems, here's the help desk that you should contact.

And finally, here are a few recommended resources for you to consider while developing your application. These include an application submission checklist, which I recommend given the new system. A resource guide, the DOJ Financial Guide, the required Grants Financial Management Online Training, and last year's allocations that should be used as a reference for 2021 planning. We're going to have the numbers out very soon but if you need a number to plan as you work on your application, that's a reference for you as we anticipate that new and upcoming operation.

So--and I just want to close by saying that if--please review the solicitation very closely. We've put a lot of time and effort into that document and that is your all-inclusive guide for submitting your application. And there's links in it and there's lots of step-by-step instructions. So please look at that document closely if you have questions. We try to anticipate those questions over the years that have come up and we hope that that will serve as an important resource. Okay. This concludes the BJA proportion of the presentation. And I'm now going to turn it over to Brandy at EOUSA who'll provide some additional information. Brandy.

BRANDY DONINI-MELANSON: Great. Thanks, Steve. So I'm going to touch on a few PSN program basics. So next slide. All right. So let me first clarify what do I mean by PSN basics. What I'm referring to on this slide relates to PSN generally. And as most know, PSN is the Department of Justice's violent crime reduction program and it exists with or without PSN grant funds. I think it's really important to provide these basic PSN elements and it's important to know that as it relates to the PSN program, every district must have a written PSN strategic plan and it's critical that the PSN strategic plan includes perspectives from a range of individuals and disciplines. And by this, I mean, law enforcement and non-law enforcement, which could include educators and representatives from youth-serving organizations, neighborhood groups, victim service

organizations, re-entry service providers, parent groups, business groups, and really others that serve and support the community and violence prevention. And the districts can gain perspective in a number of different ways. They can gain perspective through meetings, conversations, and other engagement approaches with stakeholders.

As referenced on the slide, the written strategy should identify issues and challenges and approaches for addressing issues--specific issues and challenges, right? So it's not enough to just say these are the challenges and the problems that you--it's important that the strategy also includes the approach, the strategy, the activities for addressing those problems. And so the written strategy should also include elements of community outreach, prevention, intervention, enforcement activities. And it should also identify the strategy areas that can benefit from training, technical assistance, and grant funding and we're going to--at EOUSA, we will provide the U.S. Attorneys with more details on what should go into the written PSN strategic plan and as well as we'll be providing some guidance on engagement considerations. But I really want to highlight these PSN basics because it's really important that districts have a foundation before they jump into their grant projects. The grant project is really informed by the district's larger PSN strategy.

All right. So Kate covered this--touched on this already but I wanted to just highlight a few--a few important items. So the grant solicitation references the use of, and I put it in quotes, "the PSN team." And let me clarify that just a little. So this can be a formal or informal team. The U.S. Attorney, with insight from other law enforcement agencies, should discuss who should really be engaged in part of the team. There's some nuance associated with formal teams and that seeks to include non-law enforcement representatives. I know that this is an important component in some districts. It's to, again, it's always an important aspect to include non-law enforcement perspective but I think the distinguisher here is, are you including those individuals as part of a formal PSN team? And if you are, I think there's--again, there's some nuance related to that and I don't want to spend too much time getting into that nuance because EOUSA is definitely going to be providing some guidance on this in the future and we've certainly provided some in the past. But I did want to make a note because I think it's important, as you think about your teams and you think about whether or not you're going to have or have formal teams that include non-law enforcement representatives. There's really some considerations that you should think about.

The U.S. Attorney's Office isn't really federal employees as a whole. There are some real concerns around avoiding the appearance of favoritism, and federal employees must act impartially when engaging entities. And so I think if districts need help talking through how to navigate the challenges related to the composition of their PSN team, they should always feel like they can call their ethics advisors and they can always give me a call to help troubleshoot. I know this is a particular challenge in some districts and I certainly want to make sure that we flag that for you. Again, we just--there just needs to be some caution around avoiding the appearance of favoritism. Inviting specific NGOs versus non--some other NGO. For instance, you want to--you want to include the Boys & Girls Club on your PSN team but not the YMCA. I think that is a concern where you have to think about is that going to give the appearance of favoritism. So again, it's a nuance issue and it's

very much driven by the district dynamic. But again, flagging it for you and we can always talk offline if you have some concerns or challenges you want to address.

Okay. The next item relates to--yeah, there we go. So the next item is sort of similar. When we think about the fiscal agent selection, nonfederal--well, let me back up, the PSN team selects the fiscal agent to administer the PSN grant. So it's important to know that U.S. Attorney's Office should not be making the selection on who the fiscal agent is. That really should come from the PSN team. U.S. Attorneys can make the recommendation but they cannot make the selection. So why is that? And I think as was mentioned previously, fiscal agents are entitled to up to 10% of grant funding and U.S. Attorneys and other federal employees were prohibited from identifying recipients in federal grants as it can be perceived as favoring one entity over another, which is prohibited. And it also could be considered an endorsement, which is also prohibited under 5 CFR and we can give you at some point of your interest the actual sections of the CFR. Next--the next goal there is nonfederal/nonconflicted PSN team members must select the fiscal agent. Again, for the same reason, they cannot identify. Yeah, for the same reasons as above. The U.S. Attorney must certify the--certify the fiscal agent. You'll see a link there to the certification process. I think it's important to also note that U.S. Attorney's Offices must provide the fiscal agent with the letter so it can be uploaded into the system at the time of the application. The U.S. Attorney's Office doesn't need to email the letter to BJA directly. And the letter--the name on the letter should now be to Kristen Mahoney, who is the Acting BJA Director. All right.

So this slide pertains to documentation necessary for the grant application. I thought it was worth highlighting a few of these specific items. And just to clarify some of the roles, I think that what we've seen in the past is there've been some sort of confusion as to what the U.S. Attorney's Office and the PSN team role is in terms of grant application and the documentation necessary for the grant application. So as has been mentioned previously, there's really a lot of paperwork that goes into applying for a federal grant. And some of the documents are going to be project specific and then there are going to be some that are administrative specific. And so I think it's just really important for U.S. Attorneys and PSN teams to know and understand that they need to be providing the fiscal agent with information and direction, so the fiscal agent can complete the necessary project specific paperwork for the grant application and subaward projects. So although this may--this may be less problematic in situations where perhaps a police department is the fiscal agent, I have heard of this being particularly challenging for fiscal agents that are state administering agencies or NGOs in that they could be a little less familiar with the PSN strategy and the grant project focus.

So as Steve had mentioned, I want to make a big plug to encourage PSN teams to review pages 9 and 10 of the solicitation and Kate has covered those earlier. Those are the questions. BJA needs the application to answer those specific questions. And I think that, you know, again, as Steve had mentioned, we put a lot of time into those questions over the years. And if you focus on those questions and focus on ensuring that the fiscal agent knows the answers to those questions and if the fiscal agent needs answers to those questions, they should always feel like they can go back to the PSN team and the U.S.



Attorney's Office to get clarification on those questions. So again, it's just really important that you're really paying attention to those specific questions, making sure they're answered, that's going to guide the application process for you.

And one final point here is the item highlighted in red. U.S. Attorney's Offices must not write the grant application, but they can provide written materials to the PSN on behalf of the PSN team or from the PSN team to help the fiscal agent write the application. U.S. Attorney's Office, I should also say, they can review the application before the fiscal agent submits it, so that's an allowable activity. You can review--U.S. Attorneys can review that material. All right.

So just to cover a little bit on subawards/vendors and I want to touch on this as well as this is really critical for U.S. Attorney's Offices and PSN teams. And if you--as you can see on the slide, U.S. Attorneys and other federal employees who are PSN team members are prohibited from identifying specific entities as vendors and subawards. And again, this is--this goes back to some of the information I provided previously. The reason for that is it can be perceived as favoring one entity over another, which is prohibited, and it can also be considered an endorsement which is also prohibited. So who makes the selection of vendors and subawards? So, there's two approaches you can use. And some are more familiar--some may be--one may be more familiar than others. And so I think it's important to know that you have two options or perhaps there's another option and what we--I think we'd be interested in knowing if you have a third or fourth option. But you could include--if you have a PSN team, you could--it could be that the nonfederal/nonconflicted existing PSN team members, they could perhaps select the vendors or subawardees, that's one approach. Or what you could do, and I think I've seen this in some instances and this had been--this had been covered back in PSN when it--when it first started--as this idea of having a separate selection committee of nonfederal/nonconflicted individuals. And so--and those usually consisted of about three or five different individuals. So you have options here in how you want to--how you want to handle based on your district dynamic.

So I hope--I think we hope this gives you some level of flexibility in deciding, you know, what's going to work best for you. I will say that regardless of what approach you use, as Steve mentioned, the fiscal agent must ensure that it provides BJA with the necessary information on the subaward selection. I think Steve had shared that BJA needs for the subawards summary, I think which was slide 22 if I wrote it down right. I just can't stress enough how important it is to look at that information and to really be thoughtful about that subaward summary. I think it's really just a critical piece. There we go. Subaward Review, slide 22. All right. Thank you. All right. Let's see. This--so what I thought I would get, I have--yeah. So a few more details on grant-funded projects. So subawards and contractors, as you can see on this slide, should be identified in the grant application. Steve mentioned that. I wanted to emphasize that point as well because I think it is an important consideration. And when you're thinking about your strategy, your PSN strategy, and then when you're thinking about identifying the relevant grant-related items, I think it's just really important that you're very focused on what specific areas are you going to be needing PSN grant funding for.

So the second item, the PSN team must ensure that those making the selection of subawards or contracts are adequately informed about required project elements before those individuals review subawards and/or identify contractors. I should say before they--those individuals review subaward proposals, I should have had proposals there. So I'm [INDISTINCT] this because I've heard of this being a concern in some--in some districts. So it's important--you know, this really--hopefully this gives PSN teams and U.S. Attorneys some sense of clarity about what you can and can't do. And I think this is an important piece where there's a few ways that you can keep your selection committee or whoever, depending on how you have your team structured. It's just really important that there is a strong line of communication about the project because you don't want the selection committee to fund projects that are not really within the scope or the intention of the PSN team. So it's really important that the PSN team, which could include the U.S. Attorney's representative, it's really important that you're finding ways to educate those entities or those individuals who are making the selections about the project areas. And another thing--so you could meet with those individuals, you could talk about the PSN strategic plan and the areas that will be focused for grant funding. Another way you could do this is the PSN team can provide specific project requirements and evaluation criteria, which really could help the selection committee make decisions. So I just--I think the biggest point here is really on the slide is that you really have--you're not restricted in that--in increasing levels of communication with the selection committee or with individuals making those decisions. I just think it's important that you know that it's important to do that to keep the lines of communication open.

The last item is the fiscal agent must ensure that requests for proposals, statements of work, and contract language reflect the project intent as described by the PSN team. And I know some U.S. Attorney's Offices have been pretty intricately involved in helping fiscal agents ensure that the language is representational of the PSN team intent. I think that's--I think that's really important because you want to get it right at the onset. And so it's good to really be working as a team, with the PSN team, the U.S. Attorney's Office, and fiscal agent, really working together to make sure that information is exactly what it is intended to be.

So this is going to be--these are just really my final thoughts here. And I think that hopefully this adds some clarity in who does what. The U.S. Attorney's Office does not issue RFPs or write contracts. That's a responsibility on the fiscal agent. If they can provide the fiscal agent with written information to help with the development of those documents, and I do know that some districts have done that and that's been extremely helpful to the fiscal agent. PSN teams could consider funding media/outreach product--products using PSN grant funding. I spoke to a district the other day and I'm super excited--I'm super excited by its potential media project that they're working on. I think one thing to keep in mind now is products created using the PSN grant funds require DOJ before finalization and dissemination. And so I think it's important to keep in mind that that may impact your grant project timeline. And I would also ensure that potential subawardees know that the approval--know that there are approval restrictions in advance. I know of at least one district whose subawardee dropped out after learning about the approval. So, I think frontloading that, making sure that that's a potent--that

people understand that that is--a requirement's important. And, you know, I think it's also important for the fiscal agent to make sure that those approval requirements are reflected in the statement of work and contract.

The last item relates to measuring the impact of violent crime reduction efforts. This is really essential. It's going to help you figure out whether what you're doing is working and it is also going to be a really important--really important for the broader Project Safe Neighborhood strategic plans. So I think it's important for teams to just consider whether or not this is going to be a struggle for them, that they need to focus on grant funding to work. I think measuring impact and perhaps what's contributing to maybe the difficulties, is this about data collection where perhaps there are data collection deficits, is this a place where the PSN grant funding should be surged to address those deficits. So really give that some thought. EOUSA is going to offer U.S. Attorneys more direction on this in the coming weeks as measuring impacts is really going to be important to the district's broader PSN strategic plan. So I just want to make a note about that now as you start to prepare your grant application. That's all I have. Here's my contact info if you need to reach me.

DARYL FOX: Okay. Thanks, Brandy, for that. Thanks everybody for the presentation. At this point, I just want to note that, you know, this PowerPoint recording and transcript will be posted to the BJA website for future reference. So if you joined in late or you need to reference this at a later time, it will be posted there. At this point, we can get into some questions that have come in throughout the webinar here for answering. I know, Steve, thanks, you've been very active in answering those directly to those individuals but for the point of the transcript and the recording, we could ask these verbally here. The first one is "Will certification need to be made each year if using the same fiscal agent used for previous PSN grants in '18, '19, and '20?"

STEPHEN FENDER: Thanks for that. Any--so any--so the certification from the U.S. Attorney's Office comes--from the U.S. Attorney is for each application, so we need a letter for certification from the U.S. Attorney by application year. So we'll just need one for '21, you know, if you've done them for '20, we need a new letter for 2021.

DARYL FOX: Next question is "Do you have subaward templates by chance for submitting, for formatting, and missing documentation sometimes as a problem? Is there anything as far as a template that can be used or that apply?"

STEPHEN FENDER: We sorta do. And to answer your question so, please call--feel free to call me after this and--or let's set up a time to chat. So what we need--effectively the template of the budget is the budget form, and then a summary would be just a, you know, a--some--a paragraph that explains, you know, I think I said the five whys, yeah, that sounds good, who, what, when, where, why of who's getting the money and what they're going to do with it, how it relates to violent crime reduction and if you're satisfying this 30% Gang Set Aside requirement for '19, '20, or '21. So the template would be the--we have a budget form, please use that, and otherwise we would just look for a paragraph that includes that information.

DARYL FOX: Thanks for that, Steve. Next question is "If a subrecipient claims indirect cost, does that count against the maximum 10% of administrative cost?"

STEPHEN FENDER: That's a good question. So I think it's important to clearly distinguish indirect and administrative costs for the purpose of this grant, so for--if you have a subaward that wants to charge indirect, that's separate from administrative. So admin funds would be--would be anything that's nonprogrammatic that's used to manage the grant and that, you know, grant administration, financial administration, part of the subgrantee accounting cost, it was--if they--if it's nonprogrammatic, it's administrative, and should be avoided--and it should be, you know, part of the 10% and that is the direct contrast to indirect costs, which are not direct, hence the name. So if you have indirect costs they want to charge and it's in their approved rate, and please look at that closely, that would be separate from the admin, so they can charge indirect without impacting the admin cap. I think that's the ultimate question.

DARYL FOX: "Is there an RFP requirement for subs or can a task force select the providers they wish to use?"

STEPHEN FENDER: Good question. A lot of that was from '18 only so no RFP requirement, as we had in '18. That was only for '18, so '19, '20, '21, you would just need to have a selection committee make funding decisions, nonfederal, nonconflicted selection committee make the funding decisions before you send the documentation to BJA for review and authorization.

DARYL FOX: Next person is "I'm wondering if--the strategic--the strategic action plan is not due with the application but due after, is that correct?"

STEPHEN FENDER: That's right and that's a key distinction from previous years. Oops, sorry, Kate.

BRANDY DONINI-MELANSON: Yeah, so this is...

KATE MCNAMEE: I think that'd be Brandy.

BRANDY DONINI-MELANSON: Yup. So this is Brandy. So this...

STEPHEN FENDER: Oh, okay, sorry.

BRANDY DONINI-MELANSON: Yeah. So the strategic action plan is definitely going to be coming later.

DARYL FOX: And then the next item...

BRANDY DONINI-MELANSON: And let me--actually let me--let me clarify that because that is--that's going to be a Department of Justice requirement of having a written strategic

plan. So let me actually clarify that because in the past, gosh, back in, what was it, Kate? 2018 perhaps, we've...

KATE MCNAMEE: Yes, ma'am.

BRANDY DONINI-MELANSON: There's a requirement--yeah, we required a strategic action plan, that is really different from what we are going to--what's going to be required by the department. A strategic action plan is a little bit different than the PSN strategic plan. I know that's confusing but we'll be providing more guidance on that to U.S. Attorney.

DARYL FOX: And, Stephen, I know you addressed this directly, just about the admin cost and subs, what's considered under the admin in that realm?

STEPHEN FENDER: Oh, yup, so the same as before, I would just--so anything nonprogrammatic, as it relates to managing the grant, supporting the fiscal agent administration of the--of the grant program, and otherwise the costs need to be programmatic.

DARYL FOX: "And regarding certifications, is that an annual basis?"

STEPHEN FENDER: Nope, just at the time of application.

DARYL FOX: "And when using media outreach, do we just--do we request approval from DOJ or do they need to go through a contract person for that?"

STEPHEN FENDER: So for any grant-funded publication, they need to be approved before release and I recommend sending something to us to get it to review and approval before you obligate any money, so in case there's any changes they won't increase the cost. There have been things that have not been approved that are already produced. So it might be a best practice to get--if you have a video, you have a script you could send for us to review and approve, it's the first step. And then if you have a publication, maybe lay out or before print, wait, if we still print things, I'm not sure, but if you have a website that you're going to put together, you know, give us the opportunity to review that before you obligate and expend funds if possible. That way, if there's changes that need to be made, it won't--it won't cost any extra money. But there will be a special mention--not special mention, an award condition on the grant like there had been in previous years that will require BJA review and approval of all grant-funded publications.

DARYL FOX: "Can you describe what a task force is as it relates to the 30% set-aside, constitutes a task force?"

STEPHEN FENDER: Kate, you want to take that one?

KATE MCNAMEE: I can--yeah, I can take that one. We have been very broad in what constitutes a task force. We have been very broad in what that money can be used for purposely so because we know that a lot of PSN districts don't necessarily have a

traditional gang problem as would be defined typically. So I would just suggest that you take a look at the FAQs because we do define, you know, what we mean by a task force, what we mean by transnational crime, what--we really do break it down very well there. And if you have any further need for, you know, clarification, please don't hesitate to reach out to me.

DARYL FOX: "Are there--is a due date specified for the strategic plan or submission?"

BRANDY DONINI-MELANSON: As of--so it's not required at the time of application and we will be at EOUSA giving some guidance very soon when the department rolls out its new violent crime reduction strategy, we'll provide U.S. Attorney Offices with more information on the deadline.

DARYL FOX: "Are subawards still contingent on making a 1373 certification?"

STEPHEN FENDER: No. That's not part of the '21 grant, or '20, or '19, or '18.

DARYL FOX: Next question is "Can funds be released prior to the strategic action plan being completed?" Separate questions also for fiscal agency purposes and subs.

KATE MCNAMEE: At this point in time, we will not be withholding funds based on the strategic plan, but there will be budget holds and other holds on the funding depending on the application received. Steve, do you have anything else to add to that?

STEPHEN FENDER: Yeah, that's right. I think at this time, we don't intend to hold for the action plan [INDISTINCT] come for that. That's going to be a higher level strategy that will go outside the scope of the '21 grant. So we're not going to hold for that--for the strategic plan, it will be somewhat different than previous years, so good question. Separate question. [INDISTINCT] I'm not sure about the second part [INDISTINCT] but if you want to call or email me, I'm glad to talk to that.

DARYL FOX: The last question entered to this time is "Can a USAO decide the target area and then form the PSN team around that area?"

BRANDY DONINI-MELANSON: So that's a great question. I think that what's really important is the U.S. Attorney's Office, when you think about deciding an area I think that you--it's important that your perspective be informed by others. So, I guess that's one way of saying you should not be making that decision in a vacuum. It really should be made based on feedback from--perhaps your violent crime needs analysis, how are you, which, again, is informed really by a range of perspectives. So I would say that you shouldn't be making decisions on your target area. This really should be decided through sort of feedback from others. Now whether that's through a formal PSN team or not, I think it's just important to know that you shouldn't be making that decision in a silo. And we will also be providing more information about--because that's going to be really part of the strategic planning process, too. So we'll definitely be getting U.S. Attorney's Offices more information about engaging in these types of discussions.

STEPHEN FENDER: Yeah. I'd like to add one point on that, is that, you know, if--what we want to avoid is the, you know, the federal employees selecting, deciding specifically where the funds going, you know, so, you know, that's something to consider. If you selected a target that was really narrow, you know, you certainly could be direct, you know, funded this way, so I think that--I just defer to Brandy's point regarding the collaborative decision-making for the target area and whether there's multiple target areas and who may be able to perform the grant-funded--proposed grant-funded activities in those target areas, so those are things that seem, too as well [INDISTINCT], yeah, but I'm glad to chat about that if needed after.

DARYL FOX: Okay. That's all the questions that have come in at this time. Is there anything else in closing, Kate, that you wanted to mention or...

KATE MCNAMEE: No, that we are here to answer your questions, we know with the new system with JustGrants, you know, it might be a bumpy ride as all new things tend to be. So we have resources to assist you through that and we look forward to working with you for another successful year.

DARYL FOX: Wonderful. So on behalf of the Bureau of Justice Assistance, the Executive Office for United States Attorneys, and our panelists, we want to thank you for joining today's webinar. This will end today's presentation.