Managing Your Award

Grantee Training







Presenters

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Agenda

- BJA Overview
- Revised Part 200 Uniform Requirements
- Award Elements
- Additional Training
- Resources
- Q&A



Attendee Poll

How much experience do you have managing OJP/BJA awards?

- l've managed multiple BJA awards.
- ☐ I've managed OJP awards from other offices (e.g., OVC, OJJDP) but this is my first BJA award.
- I've not managed any OJP/BJA awards but have managed other federal grant awards.
- This is the first federal award I'm managing.



Attendee Poll

What is your role in JustGrants?

- □ Grant Award Administrator
- □ Alternate Grant Award Administrator
- ☐ Financial Manager
- □ Authorized Representative
- Entity Administrator
- Other





BJA Overview

U.S. Department of Justice Bureau of Justice Assistance

Mission: BJA's mission is to provide leadership and services in grant administration and criminal justice policy development to support state, local, and tribal justice strategies to achieve safer communities. BJA works with communities, governments, and nonprofit organizations to reduce crime, recidivism, and unnecessary confinement, and promote a safe and fair criminal justice system.



https://bja.ojp.gov/

Karhlton F. Moore, BJA Director



How BJA Supports the Field







Investments

Provide diverse funding to accomplish goals.

Sharing Knowledge

Research, develop, and deliver what works to build capacity and improve outcomes.

Engagement

Consult, connect, and convene.







Supporting Your Program







BJA POLICY TEAM

Develops grant programs and directs technical assistance to advance the field's public safety goals.



BJA PROGRAMS TEAM

Grant monitoring and administration assistance to ensure compliance. Primary point of contact at BJA.



BJA PPI TEAM

Develops tools and collects performance measures data to assess achievement of those goals. All BJA grantees collect and report performance data.



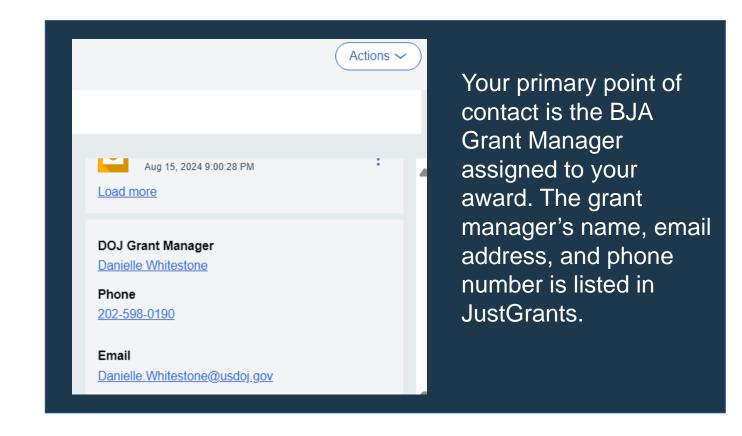
TTA PROVIDER

Provides subject matter expertise and project management support. Conduit to BJA Policy Team.

BJA Programs Office

BJA Grant Managers can assist with:

- Accepting the award
- Accessing funds
- Compliance with award conditions
- Reviewing and approving performance reports
- Grant award modifications
- Training and technical assistance
- Grant closeout procedures







Revised Part 200 Uniform Requirements

Key Takeaways

- OMB sets forth Federal government-wide guidance for Federal assistance (e.g., grants and cooperative agreements) in Part 200 Uniform Requirements.
- Revised Part 200 Uniform Requirements took effect on October 1, 2024.
- Generally, the revisions relax (rather than impose) restrictions on applicants and recipients.
- Implementation may vary across federal agencies.
- For DOJ awards:
 - o The date of the action under the award (not the date of the award) is the determining factor as to which Part 200 requirements apply.
 - Prior approvals and Grant Award Modifications (GAMs) are often required to apply the updated guidance to existing awards.

Timing and Recipient Award Actions

When was the action taken?	Before October 1, 2024	On or after October 1, 2024	
Which version applies?	Previous Part 200 Uniform Requirements.	Updated Part 200 Uniform Requirements.	
How do updates apply?	Updates cannot be retroactively applied to grant award actions prior to October 1.	Prior approval via a Grant Award Modification (GAM) often required.	
What types of recipient award actions would apply?	N/A	 Obligating or incurring project costs Making subawards or entering into procurement contracts Negotiating (or re-negotiating) indirect cost rates Budget and award modifications 	



Notable Updates for OJP Recipients

Period of Availability

 Allowance for administrative closeout costs incurred during 120-day liquidation period

Indirect Costs

- Modified Total Direct Cost (MTDC) subaward threshold increased from \$25,000 to \$50,000
- Maximum De Minimis Indirect Cost Rate increased from 10% to 15%

Costs Requiring Approval

 Supply vs equipment threshold increased from \$5,000 to \$10,000

Revision of Budget and Program Plans

- Submit Project Period Extension GAMs 30 days prior to the end date for one-time or additional extensions
- Submit scope and budget GAMs for subrecipient changes under competitive awards

Notable Updates for OJP Recipients

Audit Requirements

 Single Audit threshold increased from \$750,000 to \$1M

Subrecipient Monitoring

- Emphasis on prime recipient monitoring responsibilities
- Risk assessments includes fraud risk
- Confirm whether subrecipients suspended or debarred from receiving federal funds

Procurement Standards

- Competition: can use geographic preference
- Consider these business types:
 - Small-, minority-, women-, and veteran-owned
 - Labor surplus area firms
- Tribes can follow own policies and procedures:
 - Use, management, and disposal of equipment
 - o Procurement

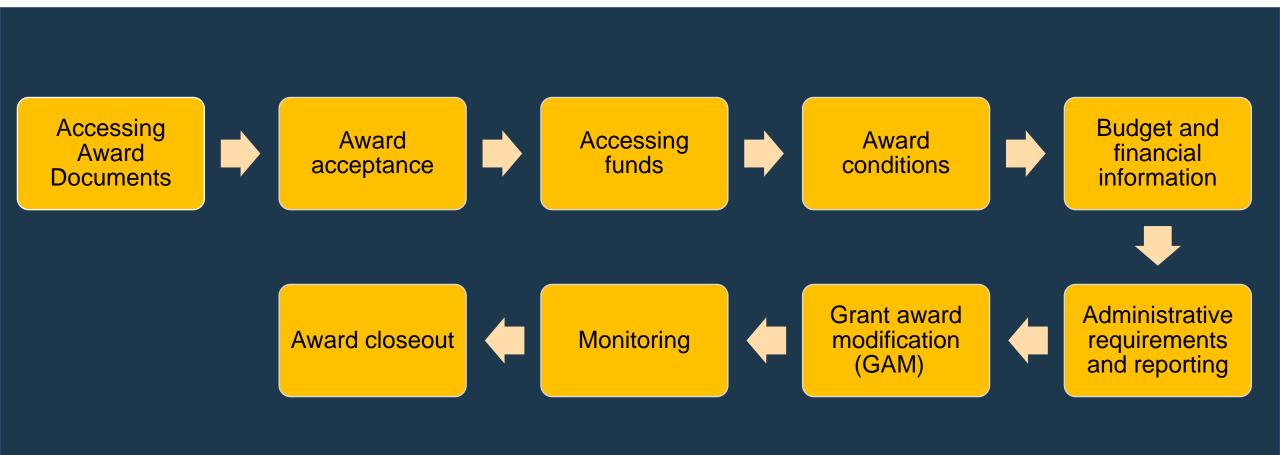
References/Resources

- DOJ Grants Financial Guide
- Council on Federal Financial Assistance (COFFA)
- Legal reference: <u>2 C.F.R. Part 200 ("Part 200 Uniform Requirements")</u>
- Part 200 Uniform Requirements | Office of Justice Programs



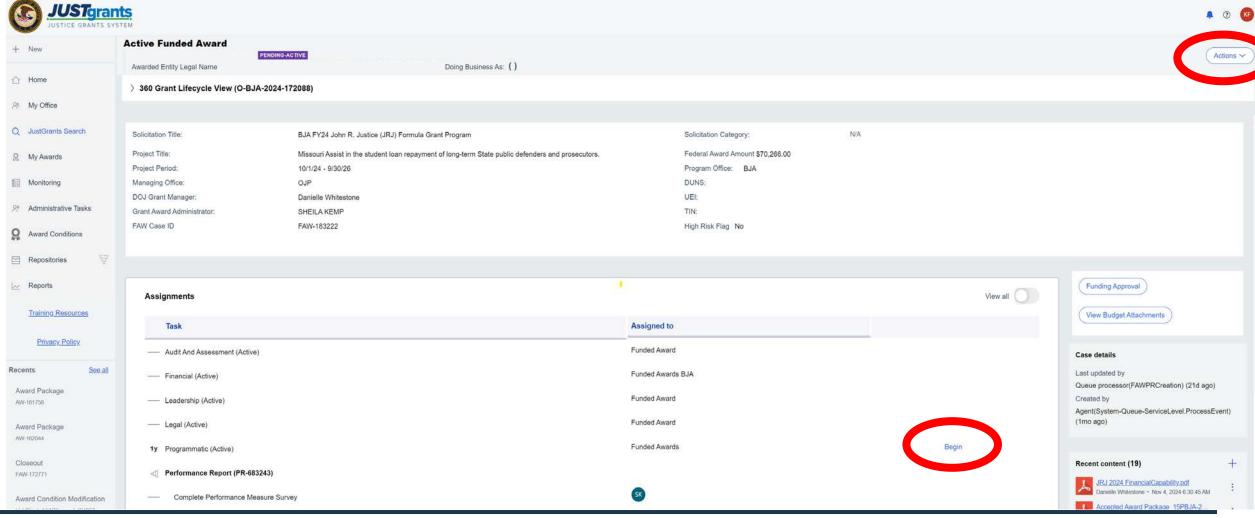
Award Elements

Award Elements





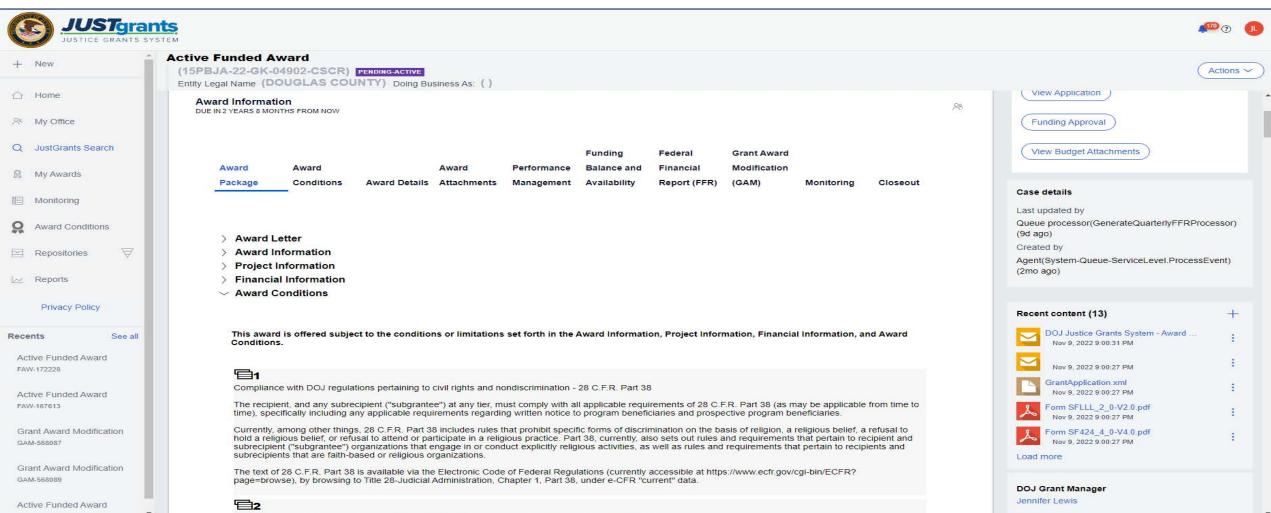
Accessing Award Documents in JustGrants





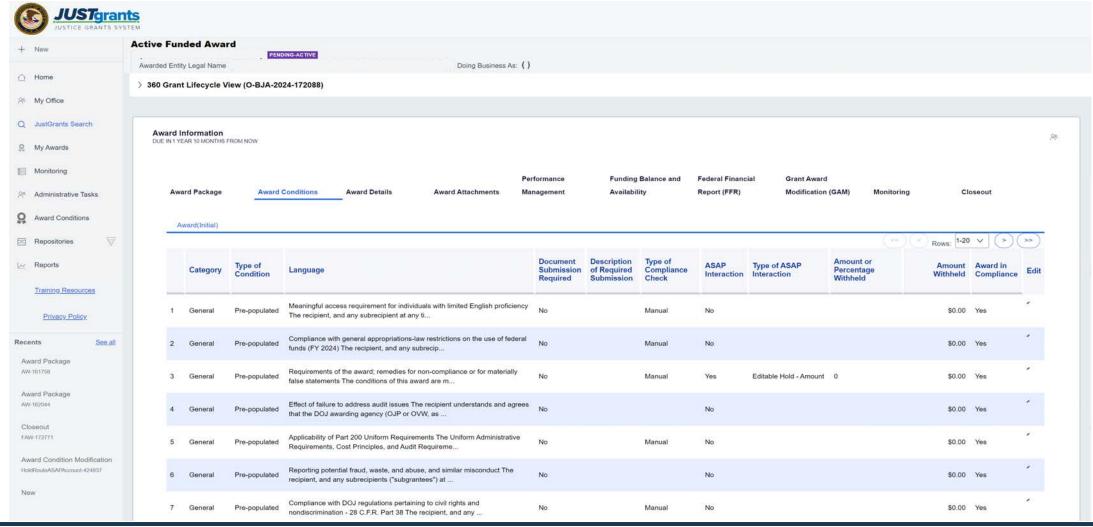


Accessing Award Package





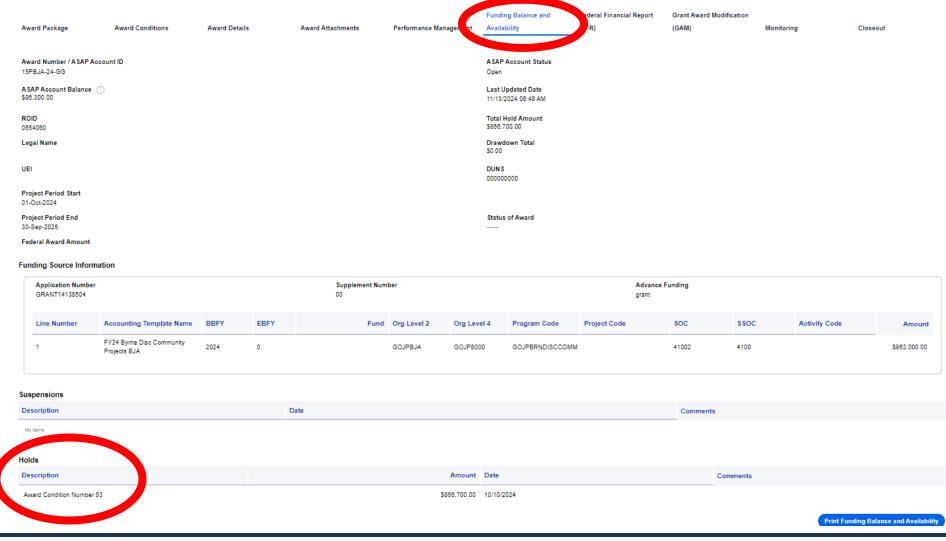
Accessing Award Conditions







Award Condition Holds





Award Acceptance

The grant award agreement is a legally binding contract with the federal government.

- The Authorized Representative accepts the award electronically in JustGrants.
- Applicants have 45 days to accept the award through JustGrants from the date of award notification, but if you need more time contact your BJA Grant Manager.
- Training resources for award acceptance are available here: https://justicegrants.usdoj.gov/training/training-grant-award-acceptance.

NOTE: If your agency is contemplating declining the award agreement, please first contact BJA to discuss the situation.







The Entity
Administrator (EA)
assigns the Grant
Award Administrator
and Financial Manager
in JustGrants. The EA
also confirms the
Authorized
Representative that
was assigned to the
application.

Instructions begin on page 11:

https://justicegrants.usdoj.gov/sites/ g/files/xyckuh296/files/media/docum ent/jarg-grantee-accept.pdf



If the Authorized Representative needs to be changed prior to award acceptance, the EA can register the correct person in DIAMD/JustGrants and change the role assignment.

See entity management guidance beginning on page 16:

https://justicegrants.usdoj.gov/training/jarg-entity-management.pdf



After the role assignments have been made and the Authorized Representative has been confirmed or reassigned, the award agreement will be in the Authorized Representative's worklist to be reviewed and accepted.

See page 17:

https://justicegrants.usdoj.gov/sites/g/files/xyckuh296/files/media/document/jarg-grantee-accept.pdf



After the award has been accepted the award status in JustGrants will be either PENDING-ACTIVE or PENDING-ASAPNOTIFICATIONSENT

Award management resource:

https://justicegrants.usdoj.gov/training/training-award-management

Accessing Funds

- Award accepted in JustGrants.
- Entity registration in the U.S.
 Treasury's Automated Standard Application for Payments (ASAP)
 system (https://www.fiscal.treasury.gov/asap/).
- Addressing holds on funds related to withholding award conditions, if applicable.
- Addressing suspension of ASAP account (System for Award Management (SAM) registration expired or delinquent reports), if applicable.



Automated Standard Application for Payments

The Automated Standard Application for Payments (ASAP) is a completely electronic system that federal agencies use to quickly and securely transfer money to recipient organizations.

Federal agencies enroll recipient organizations, authorize their payments, and manage their accounts. Recipient organizations then request payments from these pre-authorized accounts.

Recipient organizations include state and local governments, educational and financial institutions, vendors and contractors, profit and non-profit entities and Indian tribal organizations.

ASAP is free for both federal agencies and recipient organizations

Accessing Funds: ASAP





- Current or former OJP grant recipient with an active ASAP account
 No additional action in ASAP unless another user must be added
- New OJP grant recipient
 - After the award is accepted in JustGrants, your agency's EA will receive two emails from ASAP (DoNotReply.asap@mail.twai.gov) to begin the registration process.
 - To have the ASAP registration email resent and/or for assistance registering in ASAP, contact OCFO Customer Service at ask.ocfo@ojp.usdoj.gov or 800-458-0786.
 - o ASAP resources available here: https://justicegrants.usdoj.gov/resources/asap



Award Conditions: Overview

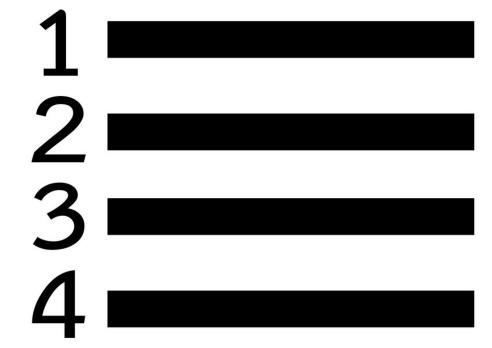
Grantees are responsible for adhering to all applicable award conditions.

 Award conditions 1 - 31 apply to all OJP awards.

Resource: https://www.ojp.gov/funding/explore/legaloverview2024/mandatorytermsconditions

- Award conditions 32+ are specific to the program and your award.
- There may be one or more withholding award conditions, which prevent expenditure and draw down of funds until the condition is met.





Award Conditions: Withholding

Withholding award conditions prohibit expenditure or draw down of funds until:

- Specified action or document is approved by BJA
- Award Condition Modification (ACM) approved

Your BJA Grant Manager will provide guidance on how to address active withholding conditions.



Most common withholding conditions:

- Budget not cleared/approved or questioned costs (this condition allows access to up to 10 percent of funding)
- Missing or insufficient application information (for example, missing proposal narrative)
- Additional approvals needed based on type of project (for example, projects with environmental impact)

Resource:

https://justicegrants.usdoj.gov/sites/g/files/xyckuh296/files/media/document/FINAL_EXT_Awd-Conditions-JARG_072021.pdf





Budget/Financial: Budget Clearance

- If the award budget was not cleared/approved prior to award notification, changes may be required and OJP/BJA must approve it before you can access the funds.
- Most common reasons a budget not cleared/approved
 - Misclassification of costs
 - Insufficient detail on calculation and/or narrative
 - Unallowable or questioned costs

OCFO requests changes via JustGrants Budget Clearance GAM

Budget
Clearance
GAM
assigned to
the GAA's
worklist in
JustGrants

GAA makes requested revisions and resubmits the GAM Grant Manager approves GAM to OCFO for review OCFO
approves
GAM if there
are no
additional
changes or
clarifications
required

Grant manager issues an ACM to release the funds





Budget/Financial: Unallowable Costs





All costs must be **allowable**, **reasonable**, **allocable**, and **necessary** to the project per the **DOJ Grants Financial Guide** and **2 C.F.R. 200**. Examples of unallowable costs include but may not be limited to:

Costs that are not reasonable or necessary for the performance of the federal award

Costs specified as unallowable in the program notice of funding opportunity

Lobbying or fundraising

Unmanned aerial vehicles/systems (UAVs/UASs)

Prohibited and controlled equipment, consistent with Executive Order (EO) 14074, per OJP policy

Land Acquisition

Entertainment

Supplanting state or local funds

Administrative: Grants Financial Management Training

The Grant Award Administrator and Financial Manager must complete training within 120 days of grant acceptance unless previously completed in the last three years.

- If the Grant Award Administrator and/or Financial Manager change, they will have 120 days to complete their training from the day they are added within the JustGrants system.
- For certain recipients, funds will be withheld until completed.
- Register for training
 - o In person: https://gfmts.training.ojp.gov/
 - Online: https://onlinegfmt.training.ojp.gov/
- Submit Grants Financial Management Training certificates to your BJA Grant Manager.



Administrative: Subawards and Procuremer Contracts

A **subaward** is for the purpose of carrying out a portion of a federal award and creates a federal assistance relationship with the subrecipient. **Characteristics that support the classification of a subrecipient include** when the non-federal entity:

A [procurement] contract is for the purpose of obtaining goods and services for the non-federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship are when the contractor:

- Determines who is eligible to receive what federal assistance
- Has its performance measured in relation to whether objectives of a federal program were met
- Has responsibility for programmatic decision-making
- Is responsible for adherence to applicable federal program requirements specified in the federal award
- In accordance with its agreement, uses the federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity

- Provides the goods and services within normal business operations
- Provides similar goods or services to many different purchasers
- Normally operates in a competitive environment
- Provides goods or services that are ancillary to the operation of the federal program
- Is not subject to compliance requirements of the federal program as a result of the agreement, though similar requirements may apply for other reasons





All subawards under a federal award require prior approval by the funding agency. The method of prior approval varies by grant program.

The grant recipient serves as the Pass-Through Entity and must have policies and procedures in place for managing and monitoring subawards consistent with federal requirements.

Pass-Through Entity requirements include but are not limited to:

- Assessing risk of each subrecipient
- Passing on award conditions via subaward agreement
- Monitoring each subrecipient's performance and compliance

Chapter 3.14 of the DOJ Grants Financial Guide

DOJ Grants Financial Guide 2022

Last Updated June 2023

Introduction

Best Practices

Subrecipient Monitoring

III. Postaward Requirements 🔗



Avoiding Business with Debarred and Suspended Organizations

١	Welcome to the DOJ
(Grants Financial Guide
ı	. General Information
	I. Preaward requirements
	i. I reamara requirements
	III. Postaward
	Requirements
ı	V. Organization Structure
١	V. Appendices

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Administrative: FFATA Reporting on Subawards

- Federal Funding Accountability and Transparency Act (FFATA) requires prime recipients of awards >\$30,000 to report subaward and executive compensation data on first-tier subawards >\$30,000.
- Recipients must submit the FFATA report in FSRS (<u>www.fsrs.gov</u>) by the end of the following month in which the subaward was issued.
- User guides, FAQs, helpdesk and online demos are available at www.fsrs.gov/resources.





Administrative: Procurement Contracts





All procurement transactions must be conducted in a manner to provide, to the maximum extent practical, open and free competition.

Prior written approval must be requested before executing a non-competitive (sole source) procurement over \$250,000. This does not apply to States or Indian Tribes. Budget clearance is not approval.

States and Indian Tribes must follow the same policies and procedures they use for procurements from their nonfederal funds. See <u>2 C.F.R. § 200.317</u>.

All other nonfederal entities, including subrecipients of a state, must follow 2 C.F.R. § 200.318 through § 200.326.

For more information, see <u>Chapter 3.8 of the DOJ Grants</u> <u>Financial Guide</u> and the <u>DOJ Guide to Procurement</u> <u>Procedures</u>.

DOJ Grants Financial Guide 2022

Last Updated June 2023

OJP Construction Requirements

III. Postaward Requirements & 3.1 Payments 3.2 Period of Availability of Funds 3.3 Matching or Cost Sharing Requirements 3.4 Program Income 3.5 Adjustments to Awards 3.6 Costs Requiring Prior Approval 3.7 Property Standards Procurement Standards-General Guidance Contracting with Small and Minority Businesses, women's business enterprises, and labor surplus area firms



Reporting: Overview

Report Type	Reporting Period	Due	JustGrants Role / Resource
Federal Financial Report (SF-425)—Submitted in JustGrants	Jan 1–Mar 31Apr 1–Jun 30Jul 1–Sep 30Oct 1–Dec 31	April 30July 30October 30January 30	Financial Manager
			https://justicegrants.usdoj.gov/training/training- financial-reporting
Semiannual Performance Report—Submitted in JustGrants	• Jan 1–Jun 30 • Jul 1–Dec 31	July 30January 30	Grant Award Administrator (Alternate GAA can edit but not submit)
			https://justicegrants.usdoj.gov/training/training- performance-reporting

The Final FFR and Final Performance Reports are due 120 days from the project end date.



Important Reporting Tips

Federal Financial Reports (SF-425)	Performance Reports
 Report funds obligated and/or expended, NOT draw-down amounts. Ensure funds that have been obligated align with approved budget. Report for every quarter regardless of whether expenses were incurred. Report CUMULATIVE amounts each quarter. 	 Answer performance measure questions directly in JustGrants or in the Performance Measurement Tool (PMT) – depending on program. Provide BJA Grants Manager an accurate summary of progress to date. Report must be submitted even if no activities occurred in report period. 14-day grace period after due date of regular reports before access to funds is suspended

The ASAP account will be **suspended** automatically if a report is delinquent, and funds will not be available until it has been submitted. Late reports also influence how your award risk is assessed by OJP and may affect subsequent applications.



Grant Award Modifications (GAM)

Programmatic

- Programmatic Costs GAM (costs requiring prior approval)
- Scope Change GAMs (alter programmatic activities, add subaward, change the project site, or change key staff)

Financial

- Budget Clearance GAM
- Budget Modification GAM (moving more than 10% of funds, or adding \$ into category previously \$0)
- Sole Source GAM for any sole source procurement in excess of simplified acquisition threshold (currently \$250,000)

Project Period

Generally, no more than one extension not to exceed 12 months. OJP will consider exceptions on a case-by-case basis.

BEST PRACTICE: Contact your BJA Grant Manager if you have questions prior to submitting a GAM.

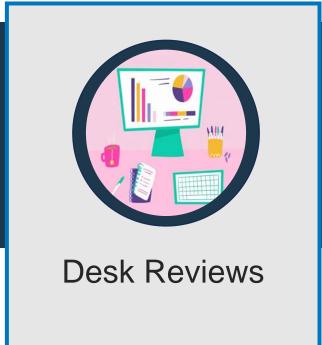
Resource: https://justicegrants.usdoj.gov/training/training-grant-award-modifications





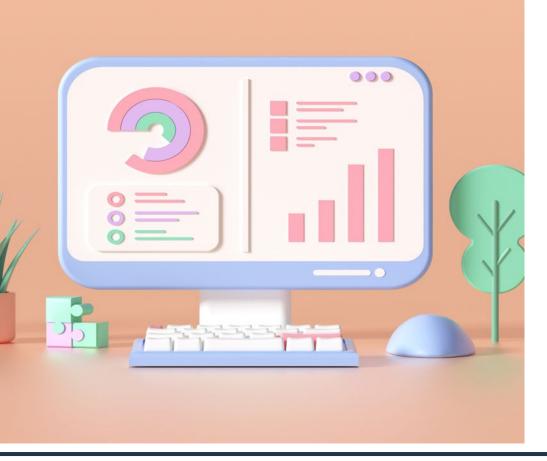
Award Monitoring











In-Depth Monitoring

- OJP conducts formal in-depth monitoring on at least 10 percent of active grants each fiscal year.
- Recipients are required to participate.
- Monitoring is conducted remotely or on site.
- Involves a full review of grant award documents and interviews of key project staff.
- Letter issued with results, to include issues for resolution and technical assistance to address them.







Closeout

- All obligations must be incurred on or before the last day of the period of performance.
- Liquidation period of up to 120-days after to make any remaining payments.
- After submitting the Final Performance Report, Final FFR, and last drawdown in ASAP, the GAA submits the closeout.
- Note: the ASAP account will be suspended automatically upon submission of the closeout or 120-days after the project end date.

Resource: https://justicegrants.usdoj.gov/training/training-closeout



Resources

Additional Trainings

- Introduction to BJA Performance Measures and Reporting
 - Thursday, December 5, 2024, from 3:00-4:30 p.m. ET
 - January 2025
- Civil Rights Obligations
- Project Period Extensions
- Award Closeout

Check the BJA <u>Grantee Training Series</u> webpage for information as its added.





Recipient Resources

https://www.ojp.gov/funding/implement/overview

Once you receive an award notification that your application was selected for funding, it's time to get to work. The OJP Recipient Resources provide instructions and training from implementing to closing your award.

Need help managing your OJP award? &

NEW! Do You Have Questions About JustGrants? Register to Attend a Virtual Q&A Session &

- Legal Notices
- OJP Grants Overview
- . OJP Training Guiding Principles for Grantees and Subgrantees
- JustGrants Login
- · JustGrants Informational Website
- JustGrants Training

Financial and Grant Reporting Resources $\mathscr E$

- · Real Property Reporting resources:
 - Frequently Asked Questions
 - Facility Utilization for Reporting Period Addendum
 - Instructions for the SF-429 Real Property Status Report
 - Real Property Status Report Attachment A (General Reporting) SF-429-A
- DOJ Grants Financial Guide
- OJP Financial Guide
- Guide to Procurement Procedures for Recipients of DOJ Grants and Cooperative
 Agreements
- Policy and Guidance for Conference Approval, Planning, and Reporting
- . FFATA Subaward Reporting Webcast
- · Federal Financial Report (SF-425) Instructions and Fillable Form for OJP
- . Federal Financial Report (SF-425) for COPS Office
- Audit Confirmation Request Form
- Grant Performance Measurement and Progress Reporting Information

Grant System Resources $\mathscr O$

- JustGrants
- JustGrants Resources
- JustGrants Training
- . IT State and Territory Points of Contact

Stay Connected!

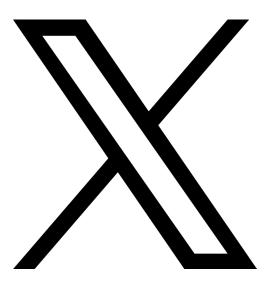
 Facebook: https://www.facebook.com/DOJBJA

• X: https://x.com/DOJBJA

YouTube: https://www.youtube.com/dojbja

- Use the QR code to subscribe to "Justice Matters" and "News From BJA" to receive the latest information from BJA and the field.
- For information on funding opportunities, publications, and initiatives, visit BJA's website: www.bja.ojp.gov.















Enter your questions in the **Q@A**, select **All Panelists**

