



U.S. Department of Justice
Office of Justice Programs
Office of Audit, Assessment, and Management

FY 2013 OJP and COPS Office Programmatic and Financial Monitoring Levels

July 2014

Final Report

About this Report

The Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS Office) are two of the three grant-making components within the U.S. Department of Justice (DOJ). OJP's mission is to provide innovative leadership to federal, state, local, and tribal justice systems by disseminating state of the art knowledge and practices across America and by providing grants for the implementation of these crime fighting strategies. The COPS Office's mission is to advance the practice of community policing in the nation's state, local, territory, and tribal law enforcement agencies. As a critical component of grant administration, grant monitoring is intended to ensure the financial and programmatic integrity and accountability of grantees. Currently, OJP and the COPS Office are responsible for conducting programmatic and financial reviews of grant awards, interacting with grantees to provide technical assistance as needed, and conducting periodic in-depth monitoring visits. While the COPS Office is a single organizational entity, OJP consists of the following six bureaus and offices, collectively referred to as *program offices*:

- ◆ Bureau of Justice Assistance (BJA)
- ◆ Bureau of Justice Statistics (BJS)
- ◆ National Institute of Justice (NIJ)
- ◆ Office of Juvenile Justice and Delinquency Prevention (OJJDP)
- ◆ Office for Victims of Crime (OVC)
- ◆ Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART Office)

Recognizing the need for an increased emphasis on performance-based grant administration, Congress established the Office of Audit, Assessment, and Management (OAAM) as a central source of monitoring oversight. Since Fiscal Year (FY) 2007, OAAM has provided oversight of OJP and the COPS Office monitoring activities.¹ OAAM's monitoring oversight function includes the following activities: development of OJP-wide grant monitoring standards, procedures, and tools; coordination of the annual DOJ monitoring plan; assessing the quality and completeness of in-depth monitoring activities; and tracking annual monitoring progress to ensure that program offices monitor at least 10% of their open award funds annually, as required by Public Law 109-162, "Violence Against Women and Department of Justice Reauthorization Act of 2005."

This report was prepared by OAAM's Program Assessment Division and discusses the monitoring process; FY 2013 improvements to monitoring priorities and procedures; and the FY 2013 monitoring statistics for OJP, the COPS Office, and OJP's Office of the Chief Financial Officer (OCFO). For questions regarding the content or distribution of this report, please contact LeToya Johnson, Acting Director of OAAM, at (202) 514-0692.

¹ Under Public Law 109-162, OAAM does not have oversight authority of the Office on Violence Against Women (OVW) and, therefore, OVW's monitoring data is outside the scope of this report.



Acronyms

ARD	Audit and Review Division
BJA	Bureau of Justice Assistance
BJS	Bureau of Justice Statistics
CCDO	Community Capacity Development Office
COPS	Office of Community Oriented Policing Services
DOJ	Department of Justice
EPDR	Enhanced Programmatic Desk Review
GAT	Grant Assessment Tool
FFR	Federal Financial Report
FY	Fiscal Year
FLS	First-Line Supervisor
FMIS2	Financial Management Information System
GFMD	Grants Financial Management Division
GMM	Grant Manager's Manual
GMS	Grants Management System
JAG	Justice Assistance Grant Program
MDT	Monitoring Decision Tool
MOSV	Multi-Office Site Visit
NIJ	National Institute of Justice
OAAM	Office of Audit, Assessment, and Management
OCFO	Office of the Chief Financial Officer
OCIO	Office of the Chief Information Officer
OJJDP	Office of Juvenile Justice and Delinquency Prevention
OJP	Office of Justice Programs
OVC	Office for Victims of Crime
OVW	Office on Violence Against Women
SMART	Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking



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1. Executive Summary

OAAM reports annually on the monitoring activities of OJP's program offices and the COPS Office to identify overall performance levels during the fiscal year and opportunities for continued improvement. In FY 2013, OJP and the COPS Office followed their established monitoring processes to assess their open, active grants to set monitoring priorities, form fiscal year monitoring plans, and conduct monitoring activities. Additionally, in an effort to continuously improve monitoring standards and procedures and to respond to issues identified throughout the year, OAAM rolled out several major technical projects and continued to refine its risk assessment process, which further enhanced the monitoring oversight of OJP and the COPS Office programs.

At the start of FY 2013, OJP had 11,451 open, active grants totaling \$8.5 billion and the COPS Office had 3,335 open, active grants totaling \$2.3 billion, as shown in Table 1. OAAM used the Grant Assessment Tool (GAT) to generate risk scores and monitoring priority levels for OJP's open, active grants. These priorities were used by OJP program offices to make monitoring decisions and develop their fiscal year monitoring plans. The COPS Office followed a similar risk assessment process to develop its fiscal year monitoring plan.

OJP program offices, the COPS Office, and OCFO selected a total of 1,781 grants totaling \$2.5 billion for in-depth monitoring at the beginning of the fiscal year, as shown in Table 1.² At the end of the fiscal year, OJP had completed in-depth programmatic monitoring on 851 grants totaling \$1.7 billion, exceeding its statutory monitoring requirement of \$854.3 million

TABLE 1

OJP and the COPS Office FY 2013 open, active and initial in-depth monitoring plan

	Number of Grants	Award Amount (in millions)
FY 2013 Open, Active		
OJP	11,451	\$8,543.3
COPS Office	3,335	\$2,264.8
Totals	14,786	\$10,808.1
FY 2013 Initial Monitoring Plan		
OJP	1,251	\$1,935.9
COPS Office	331	\$254.4
OCFO*	299	\$587.5
Subtotals	1,881	\$2,777.8
Totals**	1,781	\$2,496.9

*The planned OCFO monitoring includes only OJP and COPS Office grants.

** Grants selected for monitoring by multiple DOJ components are only counted once in the total.

TABLE 2

FY 2013 completed in-depth monitoring for OJP, the COPS Office, and OCFO*

	Number of Grants	Award Amount (in millions)
Programmatic Monitoring		
OJP	851	\$1,672.8
COPS Office	149	\$228.3
Financial Monitoring		
OCFO monitoring of OJP and the COPS Office grants	303	\$621.6
Subtotal	1,303	\$2,522.7
Total Monitoring**	1,207	\$2,236.0

*This table includes only the OCFO in-depth monitoring of OJP and COPS Office grants.

** Grants monitored by multiple components are only counted once in the total.

² OCFO performs financial monitoring for grants administered by OJP, the COPS Office, and OVW. However, OVW monitoring data is outside the scope of this report and therefore is not included in OCFO's totals.



by \$818.5 million. The COPS Office completed in-depth monitoring on 149 grants totaling \$228.3 million, exceeding its monitoring requirement of \$226.5 million by \$1.8 million. In addition, OCFO monitored 303 OJP and COPS Office grants totaling \$621.6 million. Together with OCFO's monitoring of OJP and the COPS Office grants, 1,207 grants worth \$2.2 billion were programmatically and/or financially monitored in FY 2013, as shown in Table 2.

REPORT HIGHLIGHTS

FY 2013 Overall In-depth Programmatic Monitoring Statistics

- ◆ OJP and COPS Office collectively exceeded their statutory monitoring requirement by \$820.3 million.
- ◆ Each OJP program office individually exceeded its statutory and additional OJP monitoring requirements.
- ◆ OJP's programmatic in-depth monitoring decreased 18% in award amount and 30% in number of awards from FY 2012 levels. COPS Office monitoring decreased 16% in award amount and 41% in number of awards from FY 2012 levels.
- ◆ 68% of OJP's in-depth programmatic monitoring was conducted through EPDRs, which covered 577 grants.
- ◆ Program offices completed just over half of their in-depth monitoring between Q1 and Q3, while 46% of in-depth monitoring was conducted in Q4.
- ◆ OJP and OCFO conducted joint programmatic and financial monitoring site visits to 12 grantees, covering 65 grants and totaling \$235.8 million. Six of these grantee visits, covering 59 grants and \$130.0 million, were conducted through Multi-Office Site Visits (MOSVs).

FY 2013 Financial Monitoring Statistics

- ◆ OCFO conducted on-site financial monitoring for 303 OJP and COPS Office grants totaling \$621.6 million.
- ◆ OCFO financial monitoring identified 1,021 weaknesses and \$24.5 million in questioned costs in the 846 grants reviewed.
- ◆ Among the 31 active grantees on the DOJ High-Risk List at the beginning of the fiscal year; OJP, the COPS Office, and OCFO have programmatically and/or financially monitored 22 of these grantees (71%) over the past 4 fiscal years.

FY 2013 Focused Programmatic Monitoring

- ◆ OJP monitored (programmatically and/or financially) 84% of all funds awarded under the Recovery Act program from FY 2009 to FY 2013 totaling 2.3 billion (25% of its Recovery Act grants).
- ◆ The COPS Office has monitored 55% (programmatically and/or financially) of all funds awarded under the Recovery Act program from FY 2009 to FY 2013 (20% of its Recovery Act grants).
- ◆ OJP grant managers conducted desk reviews on 10,660 grants, or 100% of all active grants.
- ◆ In FY 2013, a little under half (46%) of all OJP programmatic in-depth monitoring packages were submitted and/or approved late during the course of the year.
- ◆ Issues for resolution were identified in 19% of OJP grants programmatically monitored.



2. FY 2013 OJP and COPS Office Improvements

In an effort to continuously improve monitoring standards and procedures and to respond to issues identified throughout FY 2013, OAAM completed a number of activities to improve compliance with the policies and procedures outlined in the OJP Grant Manager's Manual (GMM), strengthen grantee oversight, and ensure that grantees are receiving consistent, quality feedback from grant managers.



With limited funds and resources available, it is critical to focus effort on those grantees and grants that pose the most risk to DOJ. In FY 2013, OJP systematically assessed grants against a set of 29 risk factors to evaluate administrative, financial, and programmatic aspects to identify grantees that pose a risk to DOJ and prioritize monitoring activities on a quarterly basis. To ensure continued improvement of its risk-based conceptual framework, OJP uses audit findings and analysis of monitoring data to identify new and/or refine existing risk factors each year. For the FY 2013 process, Federal Funding Accountability and Transparency Act (FFATA) and conference cost reporting compliance were added to the risk assessment criterion.



In FY 2013, OJP developed a comprehensive risk action plan to further identify and mitigate risk, with specific emphasis on identifying potential risk associated with non-profit and for-profit organizations. This plan identified the following goals and associated implementation activities and milestones: 1) acquire audit findings in a more timely manner and utilize findings to identify potential grantee financial risk; 2) enhance grantee capability to implement sound financial management and proper internal control practices through proper training and technical assistance; 3) strengthen OJP's ability to identify risk by improving its risk-based approach at the grant, grantee, program, and enterprise level; and 4) augment existing monitoring procedures and audit resolution activities to aid in proactively mitigating grantee financial management issues.



In FY 2013, OAAM rolled out an enhanced GAT which was converted to a SharePoint platform, providing greater flexibility and capacity to users within OJP. The migration allows for improved system response time and workflow, collaboration, reporting, and the ability to automate many manual activities. In addition, this enhancement allows for a real-time data feed from Grants Management System (GMS) to the GAT instead of manually updating the data on a quarterly basis.



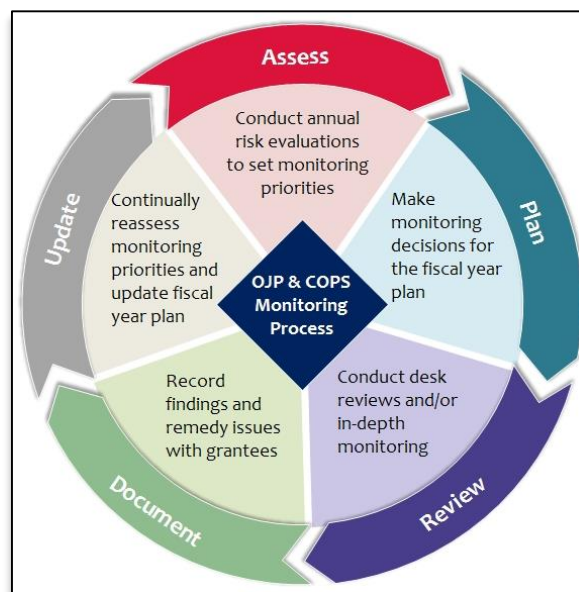
In FY 2013, OAAM rolled out the new GMS Desk Review Tool. The migration of the desk review functionality to GMS provides numerous benefits to conducting monitoring activities, including increased automation to reduce manual work, simplified access to current grants management information, and an enhanced workflow. Additionally, the migration met the critical need to include monitoring activities and documentation as part of the GMS official grant file.



In FY 2013, the COPS Office developed and executed modifications to its monitoring policies and procedures for FY 2014 including updating procedures to its site visit checklists, site visit reports, and supporting documentation, including revising the hiring and non-hiring site visit checklists to provide clearer instructions for grant monitoring specialists on documenting their site visit analyses and incorporating the site visit checklists into the official monitoring record. The modifications also included the creation of a new Document Collection Checklist, listing the types of supporting documentation that grant monitoring specialists should collect during a site visit. In addition, the checklists now allow for the ability of the COPS Office to assess grant performance by having the Grant Monitoring Specialist compare planned grant activities to actual activities using performance measurement and validation tools and analyses.

3. OJP and COPS Office In-depth Monitoring

Proactive monitoring activities ensure that the grantee is in compliance with the programmatic, administrative, and financial requirements within the framework of relevant statutes, regulation, policies, and guidelines. OJP program offices and the COPS Office are responsible for monitoring their grants and grant programs, which must include the review of the programmatic, financial, and administrative elements of their grants. The three methods of monitoring grantees are ongoing substantive communication, desk reviews, and in-depth monitoring, which includes both on-site visits and remote monitoring activities. In addition to programmatic monitoring, OCFO conducts on-site monitoring focused on the grantee's financial management processes. OCFO also conducts desk reviews to review key items that may be indicators of non-compliance with OJP Financial Guide.



3.1 Monitoring Requirements

Each fiscal year, OJP and the COPS Office are required to fulfill a statutory requirement to programmatically monitor 10% of the total open, active award amount. In addition, all OJP program offices are required to monitor 10% of the total number of their open, active grants, except for BJA. BJA is required to monitor 5% of its open, active awards due to its large number of awards. OJP has made monitoring of Recovery Act grants a priority, requiring OJP program offices to monitor at least 30% of the amount of funds awarded over the lifetime of the Recovery Act program. These requirements are referred to as *required monitoring*. Required monitoring thresholds are based on the total number and award amount of grants that are open and active as of the beginning of the fiscal year. Throughout this report, monitoring thresholds are based



on open, active total award amounts and total number of grants as of the beginning of FY 2013, October 1, 2012.

3.2 Monitoring Process

OJP and the COPS Office follow a prescribed monitoring process to ensure that the monitoring requirements are met, time and resources are spent wisely, priorities are reassessed on a regular basis, and monitoring is properly conducted and documented. The monitoring process consists of the following key steps:

1. Conduct an automated grant risk assessment
2. Develop a program office/component specific monitoring plan using risk scores and other known information
3. Engage in monitoring review activities
4. Document monitoring outcomes and findings
5. Work with grantee to remedy identified issues
6. Reassess and update monitoring priorities quarterly

The following sections provide further detail on monitoring activities that OJP and the COPS Office perform each fiscal year.

3.2.1 Automated Grant Risk Assessment

To ensure program offices meet or exceed required monitoring thresholds, and in an effort to encourage priority-based selections for in-depth monitoring, OJP and the COPS Office use an automated grant risk assessment tool to assess their open, active awards against a set of criteria at the beginning of each fiscal year. In FY 2013, OJP's automated tool, the GAT, utilized 29 risk criteria derived from existing information about the financial, administrative, and programmatic performance of grants from GMS and the Financial Management Information System (FMIS2). See Appendix A for a full list of the criteria. These risk criteria include such elements as award amounts, compliance with reporting requirements, high-risk status of grantee, whether the program is new, and whether funds have been withheld under a previous or current grant. All open and active grants are assessed quarterly against the risk criteria and are assigned a monitoring priority of high, medium, or low. OJP program offices review the GAT results, determine which grants will receive in-depth monitoring, and document these decisions in the tool. The OCFO also uses the GAT results to select grants for financial desk reviews and the aggregate score to select grantees for on-site in-depth monitoring.

The COPS Office maintains its own version of the grant assessment tool (COPS Office GAT) to assess all of its open, active grants at the beginning of each fiscal year. The COPS Office GAT is designed to utilize award and organization-level data from multiple COPS Office feeder systems and databases to address risk criteria similar to those used in the OJP GAT. The COPS Office provides OAAM with a monitoring plan based on monitoring decisions documented in its tool.

3.2.2 Monitoring Plan

Monitoring decisions made using information from both OJP's and the COPS Office's GATs are the basis for the DOJ Programmatic and Financial Monitoring Plan. This plan, which is developed



at the beginning of each fiscal year and identifies grants to be monitored, is referred to by OAAM as *planned monitoring*. In FY 2013, OAAM worked closely with OJP program offices, the COPS Office, the Office on Violence Against Women (OVW), and OCFO to coordinate monitoring plans to increase the number of joint financial and programmatic site visits. Additionally, OJP's GAT enables grant managers to submit an OCFO special request to review issues they have identified through monitoring activities. OCFO reviews these requests and adds them to its monitoring plan as warranted.

3.2.3 Monitoring Review Activities

Once a monitoring plan has been established, fiscal year monitoring activities are conducted including substantive ongoing communication with the grantee, desk reviews, and in-depth monitoring.

Substantive communication includes intensive work with grantees by mail, email, or phone. Working with the grantee through these channels, grant managers may address identified concerns with grantee compliance or performance; work toward developing a work product, deliverable, or strategy; and/or answer grantee questions. This also includes the review and/or approval of reports submitted by the grantee on a quarterly, bi-annual, and or annual basis such as Federal Financial Reports (FFR), progress reports, and performance measurement reporting.

OJP policy requires that a programmatic desk review be performed on each open, active award every 6 months but not less than once annually. If a grant manager is conducting a site visit or enhanced programmatic desk review (EPDR), a desk review must be completed within 60 days of the monitoring site visit start date.

The COPS Office conducts Office-Based Grant Reviews (OBGRs) of selected grants over the course of the fiscal year. An OBGR is a supplemental monitoring activity during which the Grant Monitoring Specialist performs a compliance and administrative review of a grant without traveling to the grantee's site.³ To determine the number of OBGR's to be assigned during the fiscal year, the COPS Office uses the following formula: the total number of grantees selected for site visits is multiplied by 20 percent (at a minimum).

The OCFO also conducts financial desk reviews on selected OJP and COPS Office grants which are designed to review key items that may be indicators of non-compliance with the OJP Financial Guide. For example, a financial desk review determines whether the grantee has drawn more cash than the expenditures reported on the most recent Federal Financial Report (FFR). The expenditures are then calculated as a percentage of the award amount and the financial monitor reaches out to the program manager to determine whether the rate of expenditures appears to be reasonable given the performance to date.

In addition to substantive communication and desk reviews, grant managers/financial monitors conduct in-depth monitoring to collect pertinent information and assess grantee performance and

³ Beginning in FY 2014, the COPS Office will enhance their OBGR process to be included as an in-depth monitoring activity which will count towards their statutory requirements.



compliance with programmatic and financial grant requirements. The types of in-depth monitoring include:

- ◆ *On-site Monitoring* - In-depth monitoring performed by a grant manager/financial monitor at the grantee site. Grants are selected based on their monitoring priority level to mitigate risk, address specific performance areas, and/or provide targeted training and technical assistance. Financial monitoring selections are based on the aggregate score for the grantee and each financial monitoring site visit includes the review of six to eight awards across multiple programs.
- ◆ *Enhanced Programmatic Desk Review*⁴ - In-depth monitoring performed remotely from the grantor site. Grant managers assess the programmatic integrity and accountability of their assigned grants and grantees using virtual and telephonic communication methods for interacting with grantees and reviewing grant files.
- ◆ *Enhanced Financial Desk Review* - In-depth monitoring performed remotely from the grantor site. Financial monitors assess the financial integrity and accountability of their grants and grantees using virtual and telegraphic communication methods for interacting with grantees and reviewing grant general ledgers and supporting documents.
- ◆ *Multi-Office Site Visit* - On-site, in-depth monitoring performed jointly by OCFO and more than one program office. Visits are determined by ranking the grantees that represent a high-risk priority to DOJ based on the results of the risk assessment process. Typically all outstanding awards, or the most active awards for the program, are reviewed in a Multi-Office Site Visit. This process allows for identification of systemic issues that a grantee may be experiencing.

3.2.4 Documenting Monitoring Findings and Resolving Issues

After conducting a site visit or an EPDR, OJP grant managers and financial monitors are required to complete a report that documents the monitoring activities and conclusions from the review. Grant managers and financial monitors are also required to record any issues identified for resolution and recommendations for corrective action in GMS. These issues and recommendations are entered into a post-monitoring letter that is sent to the grantee. Following the letter, grant managers and financial monitors are responsible for working with grantees to ensure that actions are taken to resolve the issues identified.

OJP monitoring documentation, including reports and post-monitoring letters, must be completed and approved in GMS by the grant manager's or financial monitor's first-line supervisor within 45 days of the end of the review. The 45-day process is an internal control to ensure that the grantee is being notified of any issues found during the review in a timely fashion. Not communicating to the grantee in a timely manner could perpetuate identified issues. OAAM reviews completed programmatic monitoring data submitted by grant managers in GMS at the

⁴ In FY 2013, the COPS Office did not use enhanced programmatic desk reviews to meet their monitoring requirements. All FY 2013 COPS Office in-depth monitoring was completed through on-site monitoring.



end of each quarter to track and report OJP's progress towards meeting its annual monitoring requirements and the timeliness of report submissions and approvals. The OCFO tracks the financial monitoring results to inform its financial grants management training and updates to the OJP Financial Guide.

The COPS Office also documents its on-site monitoring activities through a formal process. Grant monitoring specialists have 17 business days from the conclusion of the on-site visit to submit their site visit report package to their supervisor. The site visit package contains a site visit report, feedback letter, site visit issue status report, and other supporting documentation. Within 45 days of the date of the site visit, the site visit report package will be reviewed and approved by the grant monitoring specialist's supervisor, which results in a feedback letter being sent to the grantee.

3.2.5 Quarterly Updates

At the start of each quarter OAAM re-generates the OJP risk assessment with updated data, which may increase or decrease a grant's monitoring priority. After the risk assessment is re-run, grant managers are asked to review their monitoring plans and take into account any shifts in monitoring priority that may necessitate updating their plans. Grant managers can make changes to the monitoring plan by rescheduling monitoring to occur in a different quarter, changing the type of monitoring in the plan (site visit or EPDR), or removing previously planned monitoring. OJP grant managers use the GAT to make their updates, while the COPS Office and OVW use tracking spreadsheets. OCFO uses an Access/SharePoint database to track the financial monitoring plan compared to actual financial monitoring through final closure of the financial monitoring recommendations. OAAM validates the program office monitoring data and publishes a revised monitoring plan for the OJP program offices, the COPS Office, OCFO, and OVW each quarter.



4. FY 2013 OJP Monitoring Priorities

Since FY 2009, OJP has used a risk assessment process to inform in-depth monitoring priority of grants and grantees. In FY 2013, OJP's GAT process utilized 29 risk criteria that consist of existing information about the financial, administrative, and programmatic performance of grants to assign a risk score and corresponding monitoring priority for each grant. At the beginning of FY 2013, grant managers used the monitoring priority for each grant as a guideline to determine which grants received in-depth monitoring, in conjunction with professional discretion from their knowledge of the grantees' programmatic performance or other known issues. Risk scores are also aggregated by grantee, and the aggregated grantee scores are used to select the Multi-Office and Financial Monitoring site visits.

4.1 Monitoring Priority Levels

At the beginning of FY 2013, OJP had 11,451 open, active awards totaling \$8.5 billion distributed across OJP's six program offices as shown in Table 3 above. OAAM used the GAT to generate risk scores and program office monitoring priority levels for 11,287 of OJP's open, active grants at the beginning of the fiscal year.⁵ This initial assessment resulted in a high monitoring priority rating for 396 (4%) grants, a medium priority rating for 1,884 (17%) grants, and a low priority rating for 9,007 (80%) grants. Figure 1 displays the distribution of monitoring priority based on the initial risk assessment.

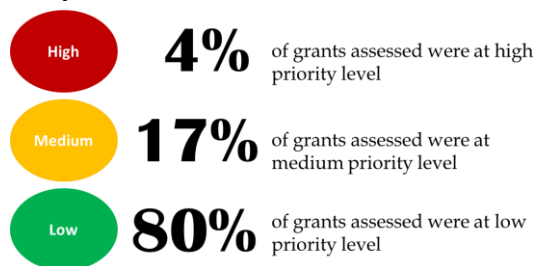
TABLE 3

OJP FY 2013 open, active grants and award amount as of October 1, 2012

	Number of Grants	Award Amount (in millions)
BJA	8,267	\$4,799.4
BJS	258	\$201.1
NIJ	944	\$564.1
OJJDP	1,382	\$1,128.8
OVC	460	\$1,810.8
SMART	140	\$39.1
Total	11,451	\$8,543.3

FIGURE 1

FY 2013 OJP distribution of monitoring priority levels based on initial risk assessment*



*The sum of the percentages do not total 100% due to rounding.

⁵ OAAM ran the FY 2013 risk assessment on September 18, 2012. One hundred sixty-four grants that would be active on October 1, 2012, were not active as of that date and, therefore, were not scored by the GAT. As a result, those grants were not included in the initial risk assessment from which the monitoring plan was selected. However, these grants were captured in the risk assessment conducted on November 13, 2012.



To assess a grant, the GAT will generate a total score for each programmatic, financial, and compliance criterion based on its relative importance by multiplying the numeric risk value by the numeric importance value. For example, a grantee designated as a DOJ high-risk grantee would receive a risk value of 2 and an importance value of 3. Therefore, the total score for that criterion would be 6. A complete list of the 29 risk criteria, their associated scores and weights, and the distribution of the grants within each risk criteria can be found in Appendix A.

4.1.1 Award Type

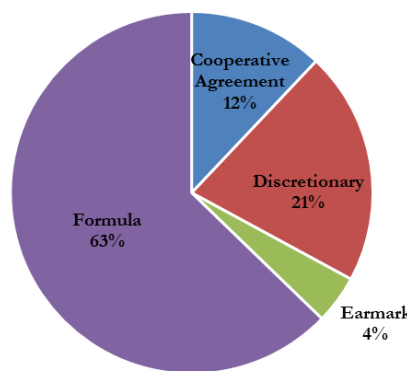
OJP grants fall into one of four types:

- ◆ Formula (0)
- ◆ Discretionary (1)
- ◆ Cooperative Agreement⁶ (2)
- ◆ Earmark (2)

OAAM has assigned each award type a specific point value based on the variations of perceived risk and/or priority in monitoring for the award type. OAAM has determined that more complex or less common types of grants such as cooperative agreements or earmarks require more sophisticated grant administration practices or by their nature have greater inherent risk. Figure 2 shows the percentage of OJP's grants by award type at the beginning of FY 2013.

FIGURE 2

OJP grants by award type as of the FY 2013 initial monitoring decision period



4.1.2 Grantee Type

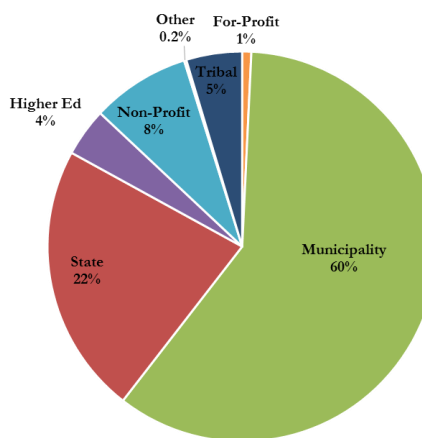
Recipients of OJP's grant funds fall into seven grantee type categories:

- ◆ State (0)
- ◆ Municipal (1)
- ◆ Non-profit (1)
- ◆ Higher Education (1)
- ◆ Tribal (2)
- ◆ For-profit (2)
- ◆ Other (which may include individuals) (2)

OAAM has used information provided by the grantee and/or grant managers to categorize all

FIGURE 3

OJP grants by grantee type as of the FY 2013 initial monitoring decision period



⁶ OJP can use a cooperative agreement for discretionary funding or earmarks. OJP uses cooperative agreements to reflect the relationship between OJP and an eligible recipient when it anticipates substantial involvement with the recipient during performance of the contemplated activity. As a result of OJP involvement in these types of awards, they are evaluated separately for monitoring purposes from standard discretionary and earmark awards.



of OJP's grantees into one of these seven categories. Similar to award type, based on historic trends around compliance and/or performance issues, OAAM has assigned a specific point value to each grantee type based on the variations of perceived risk and/or priority in monitoring for the grantee type. Figure 3 shows the percentage of OJP's grants by grantee type at the beginning of FY 2013.

4.1.3 Award Amount

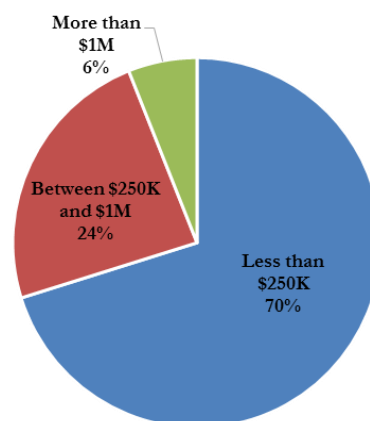
OAAM considers grants with award amounts greater than a designated threshold to pose a higher risk. OAAM has identified three award amount brackets to assign point values:

- ◆ Less than \$250,000 (0)
- ◆ Between \$250,000 and \$1 million (1)
- ◆ More than \$1 million (2)

Figure 4 shows the percentage of OJP's grants by the award amount range at the beginning of FY 2013. To avoid duplicative scoring, grants awarded to State Administering Agencies (SAAs) do not receive points for this criterion because their amounts are typically greater than \$1 million and receive points for being an SAA (See Appendix A).

FIGURE 4

OJP grants by award amount as of the FY 2013 initial monitoring decision period



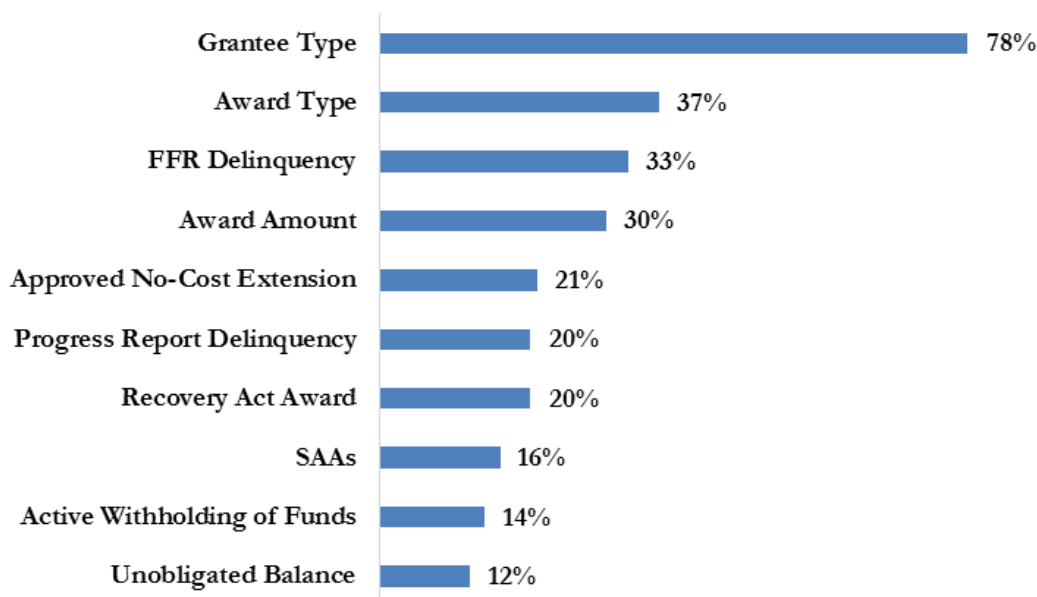
4.1.4 Risk Criteria and Impact

Some of the 29 risk criteria that OAAM uses to establish the monitoring priorities and scores for grants affect a greater number of grants than others. For example, many grants receive points for broad demographic criteria (such as grantee type, award type and award amount), while certain criteria (such as confidential funds or DOJ High-Risk List) only apply to a narrow and specific subset of OJP grants. Figure 5 below displays the ten criteria that affect the largest number of grants. The frequency of all 29 risk indicators may be found in Appendix B. In Appendix C, the contribution of each criterion to the risk model is displayed.



FIGURE 5

Top 10 risk criteria by the percentage of grants receiving points at the beginning of FY 2013



Due to the differences in importance among risk criteria and the differences in points, some criteria have a greater effect on the scores than others. Those criteria with the greatest effect on scores are not necessarily identical to the criteria that affect the greatest number of grants. For a chart of the 29 criteria and the total number of points they contribute to the scores, see Appendix C.

4.2 In-depth Programmatic Monitoring Decisions

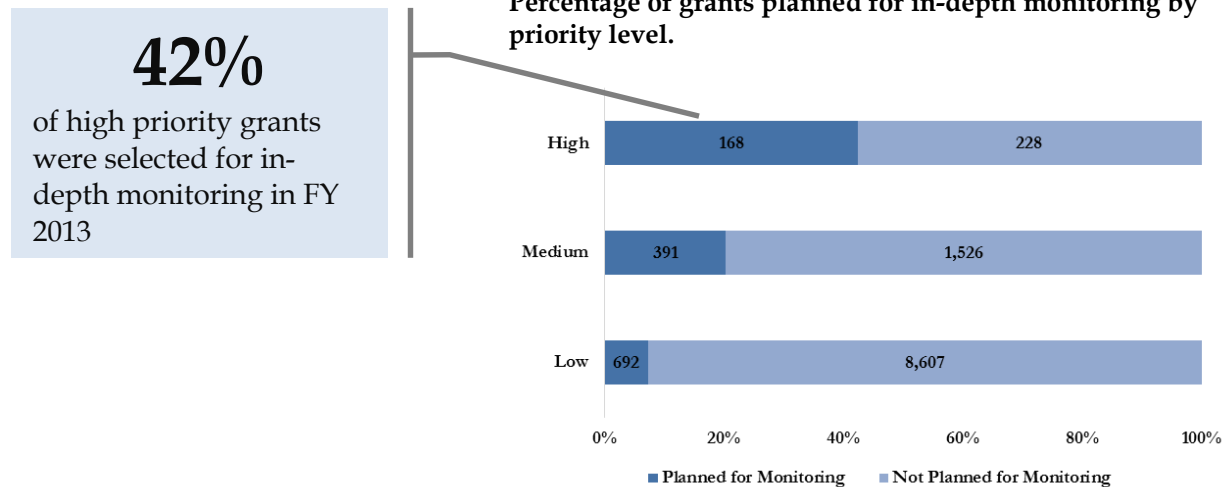
One of the primary purposes of the initial assessment is to assist grant managers in making informed decisions on where to focus their in-depth monitoring efforts during the fiscal year. Program offices are encouraged to focus on high and medium priority grants.

At the end of the FY 2013 monitoring decision period, OJP grant managers had planned to conduct in-depth monitoring for 1,251 grants. As demonstrated in Figure 6 below, among all the grants assessed as high priority, program offices selected over 42% for monitoring, compared to selecting less than 7% of those assessed as low priority.



FIGURE 6

Percentage of grants planned for in-depth monitoring by priority level.



*Numbers account for all assessed OJP grants including those not yet active as of 10/1/2012

In FY 2013, grant managers were required to select one of six standard justification comments in the GAT if they chose not to monitor a high or medium priority grant. For high priority grants, those justifications were:

- Grant has already been monitored in its lifetime, or
- Will not be monitoring this grant this fiscal year

If “Will not be monitoring this grant this fiscal year” was selected, further narrative justifying this decision was required.

For medium priority grants, the standard justifications were:

- Grant has already been monitored in its lifetime,
- New grant/too early to monitor,
- Grant about to expire, or
- Grant manager discretion

If “Grant manager discretion” was selected, additional justification narrative was required.

Table 4 shows that the most common justification comment selected for not monitoring a high priority grant was “Will not monitor grant this fiscal year.” The most common narrative provided was “Other at risk grants were selected to fulfill monitoring plan requirements and due to workload constraints I cannot conduct in-depth monitoring on this grant this fiscal year,” or a similarly-worded comment. Table 4 also shows that the most common justification comment selected for not monitoring a medium priority grant was “Grant manager discretion.” As with the detail narrative for not monitoring high priority grants, the most common narrative provided was that “Other at risk grants were selected to fulfill monitoring plan requirements and due to



workload constraints I cannot conduct in-depth monitoring on this grant this fiscal year” or a similar comment.

TABLE 4

FY 2013 justifications provided by grant managers when choosing not to programmatically monitor high and medium priority grants

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
High Priority							
Will not monitor grant this fiscal year	71	0	17	48	16	0	152
Grant has already been monitored in its lifetime	27	1	18	22	5	1	74
Medium Priority							
Grant manager discretion	816	23	44	146	24	8	1,061
Grant has already been monitored in its lifetime	93	9	36	72	2	6	218
Grant about to expire	110	9	41	23	6	4	193
New grant/too early to monitor	26	0	16	9	2	0	53
Totals							
Number of grants	1,143	42	172	320	55	19	1,751

5. FY 2013 Overall OJP and COPS Office Monitoring Statistics

5.1 Required and Completed Programmatic and Financial Monitoring

Statutory Monitoring Requirement

Each fiscal year, OJP and the COPS Office are required to fulfill a statutory requirement to programmatically monitor 10% of the total open, active award amount. Additionally, all OJP program offices are required to monitor 10% of their total number of open, active grants, except for BJA which is required to monitor 5% due to its large number of awards.

Section Highlights

- ◆ OJP and COPS collectively exceeded their statutory monitoring requirement by \$820.3 million.
- ◆ Each OJP program office individually exceeded its statutory and additional OJP monitoring requirements.

In FY 2013, OJP program offices completed 511 in-depth monitoring reviews (site visits and EPDRs) for 851 grants totaling \$1.7 billion, and the COPS Office completed 75 on-site monitoring reviews for 149 grants totaling \$228.3 million. By the end of FY 2013, OJP and the COPS Office completed 586 in-depth monitoring reviews covering 1,000 grants totaling \$1.9 billion.

Both OJP and the COPS Office have exceeded the statutory requirement since the inception of the statute in 2007. OJP program offices monitored 20% of their active award amount and the COPS Office fulfilled its requirement by monitoring



10% of its open, active award amount. Additionally, OJP exceeded its internal target to monitor 10% of its active grants by 16%.

OCFO conducted on-site financial monitoring for 303 OJP and COPS Office grants totaling \$621.6 million. Table 5 below displays the types of monitoring completed by OJP program offices, the COPS Office, and OCFO in terms of award amounts and number of grants monitored throughout the fiscal year.

TABLE 5

FY 2013 completed monitoring for OJP, the COPS Office, and OCFO*

	Number of Grants	Award Amount (in millions)
Programmatic Monitoring		
OJP	851	\$1,672.8
COPS Office	149	\$228.3
Financial Monitoring		
OCFO monitoring of OJP and COPS Office grants	303	\$621.6
Subtotal	1,303	\$2,522.7
Total Programmatic and/or Financial Monitoring**	1,207	\$2,236.0

*This table includes only the OCFO monitoring of OJP and COPS Office grants.

**The total programmatic and financial monitoring numbers are the sum of OJP, the COPS Office, and OCFO monitoring minus the overlap between OCFO and OJP and the COPS Office.

Among the 303 OJP and COPS Office grants financially monitored by OCFO, 96 were also programmatically monitored by either OJP program offices or the COPS Office. Therefore, in total, 1,207 OJP and COPS Office grants totaling \$2.2 billion received programmatic and/or financial monitoring during FY 2013. Of the 96 grants that were programmatically and financially monitored, 65 were completed through coordinated efforts between OCFO and the program offices.

OAAM tracks the programmatic monitoring levels for OJP and the COPS Office to gauge the completion rates against statutory requirements and internal targets. Table 6 below presents the award amount of open, active grants; required statutory monitoring thresholds; and completed monitoring for each program office. Each program office within OJP individually exceeded the requirement to monitor 10% of total funding by the end of FY 2013. OJP as a whole exceeded the 10% requirement by \$818.5 million, or nearly twice the required amount. The COPS Office also exceeded the requirement by \$1.8 million.



TABLE 6

FY 2013 OJP and the COPS Office open, required, and completed programmatic in-depth monitoring, by award amount (in millions)

	Open, Active Award Amount	Monitoring Required	Monitoring Completed	Amount Exceeding Requirement
OJP				
BJA	\$4,799.4	\$479.9	\$760.4	\$280.4
BJS	\$201.1	\$20.1	\$29.7	\$9.6
NIJ	\$564.1	\$56.4	\$101.4	\$45.0
OJJDP	\$1,128.8	\$112.9	\$214.3	\$101.4
OVC	\$1,810.8	\$181.1	\$562.6	\$381.5
SMART	\$39.1	\$3.9	\$4.4	\$0.5
OJP Total	\$8,543.3	\$854.3	\$1,672.8	\$818.5
COPS Office	\$2,264.8	\$226.5	\$228.3	\$1.8
OJP & COPS Office Total	\$10,808.1	\$1,080.8	\$1,901.1	\$820.3

Table 7 below presents a breakdown of each program office's number of open, active grants, their required OJP monitoring thresholds, and the number of in-depth monitoring completed. All OJP program offices are required to monitor 10% of the total number of their open, active grants, except for BJA.⁷ BJA is required to monitor 5% of its open, active awards due to its large number of awards. Each program office either met or exceeded their requirement. As a whole, OJP program offices exceeded the required threshold by 120 grants (16%).

TABLE 7

FY 2013 OJP and COPS Office open, required, and completed programmatic in-depth monitoring, by number of grants

	Open, Active Grants	Monitoring Required	Monitoring Completed	Number Exceeding Requirement
OJP				
BJA	8,267	413	448	35
BJS	258	26	30	4
NIJ	944	94	98	4
OJJDP	1,382	138	139	1
OVC	460	46	121	75
SMART	140	14	15	1
OJP Total	11,451	731	851	120
COPS Office	3,335	N/A	149	N/A
OJP & COPS Office Totals	14,786		1,000	

Note: The required monitoring level for the number of grants is 10% of the number of open, active grants each year for all program offices except BJA, for which the required monitoring threshold is 5%.

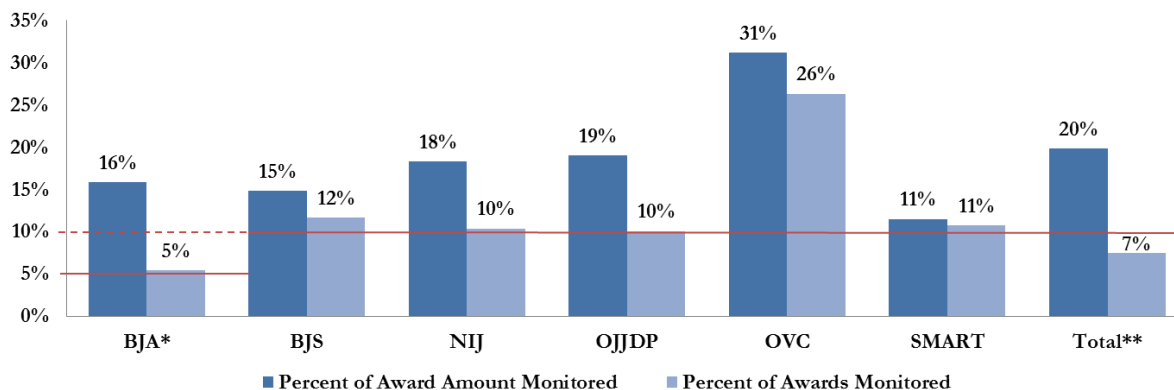
⁷ The COPS Office does not have a required number of grants to monitor.



Figure 7 below illustrates the percent of total awards and total award amount monitored by OJP program offices in FY 2013. The red line denotes the 5% required threshold for BJA and the 10% required threshold for the rest of OJP.

FIGURE 7

FY 2013 percentage of OJP's in-depth programmatic monitoring of total number of grants and total award amount, by program office



*The required monitoring level for the number of grants is 10% of the number of open, active grants each year for all program offices except BJA, for which the required monitoring threshold is 5%.

**Because of the lower required threshold for BJA, OJP's overall total required threshold is 731 grants, or 6.4%.

5.2 Fiscal Year Comparison of Completed OJP and COPS Office In-depth Programmatic Monitoring

Section Highlights

- ◆ OJP's monitoring decreased 18% in award amount and 30% in number of awards from FY 2012 levels.
- ◆ COPS' monitoring decreased 16% in award amount and 41% in number of awards from FY 2012 levels.

OAAM compares the amount of monitoring completed by OJP program offices and the COPS Office against the open, active award totals across fiscal years as a way to gauge how monitoring levels have changed over time.

In FY 2013, OJP's completed monitoring represented an 18% decrease in the dollar value monitored and a 30% decrease in the number of awards monitored from FY 2012. The COPS Office also decreased both the number of awards (41% decrease) and award amount (16% decrease) monitored in FY 2013. Table 8 compares these award amounts and number of grants monitored by OJP and the COPS Office across fiscal years.



TABLE 8

Comparison of FY 2010-2013 completed programmatic monitoring for OJP and the COPS Office, by award amount (in millions) and number of grants

	FY 2010	FY 2011	FY 2012	FY 2013
Award Amount				
OJP				
Total award amount of open, active grants	\$8,379.6	\$8,875.5	\$9,101.2	\$8,543.3
Award amount monitored	\$3,049.6	\$2,237.4	\$2,029.7	\$1,672.8
Percent of open, active award amount monitored	36%	25%	22%	20%
COPS Office				
Total award amount of open, active grants	\$2,224.4	\$2,523.4	\$2,535.1	\$2,264.8
Award amount monitored	\$234.7	\$267.9	\$270.2	\$228.3
Percent of open, active award amount monitored	11%	11%	11%	10%
Number of Grants				
OJP				
Total of open, active grants	12,394	13,504	13,134	11,451
Number of grants monitored	1,447	1,121	1,214	851
Percent of open, active grants monitored*	12%	8%	9%	7%
COPS Office				
Total of open, active grants	3,776	4,517	4,140	3,335
Number of grants monitored	185	230	253	149
Percent of open, active grants monitored	5%	5%	6%	4%

*OJP's overall total of awards monitored is less than 10% because BJA's requirement is 5%. All OJP program offices and, therefore, OJP as a whole exceeded its requirements.

Table 9 provides a detailed look at the number of grants each OJP program office has monitored compared to their open, active grants. Some program offices have seen noticeable shifts. For example, OJJDP monitored 29% of their open, active grants in FY 2010. That number fell to 10% in FY 2013.

TABLE 9

Program Office Detail Monitoring by Number of Grants since FY 2010

	FY 2010		FY 2011		FY 2012		FY 2013	
	Grants Monitored	Pct. of Total	Grants Monitored	Pct. of Total	Grants Monitored	Pct. of Total	Grants Monitored	Pct. of Total
BJA	611	7%	563	6%	553	6%	448	5%
BJS	36	19%	23	10%	31	13%	30	12%
NIJ	122	14%	107	11%	125	12%	98	10%
OJJDP	488	29%	334	17%	360	20%	139	10%
OVC	128	22%	59	10%	131	23%	121	26%
SMART	13	11%	15	11%	14	10%	15	11%
OJP Total	1,447	12%	1,121	8%	1,214	9%	851	7%



5.3 In-depth Monitoring Planning and Delivery

5.3.1 Planned In-Depth Monitoring

Section Highlights

- ◆ Both the COPS Office and OJP fell short of their original monitoring plans.
- ◆ OJP grant managers used the GAT over 50% of the time to reflect the changes in their plans.

At the beginning of each fiscal year, grant managers make an initial monitoring plan and are asked to re-evaluate and update their plan each quarter as the priorities and workloads change. OAAM tracks each office's programmatic monitoring levels to gauge adherence to the monitoring plans established at the beginning of each fiscal year. During the FY 2013 initial decision period, OJP planned to monitor 1,251 awards totaling \$1.9 billion and completed in-depth monitoring of 851 grants worth \$1.7 billion, 14% less than originally planned. The COPS Office planned to monitor 331 awards totaling \$254.4 million and completed in-depth monitoring of 149 awards totaling \$228.3, falling short of its original plan by 182 grants and \$26.1 million.⁸

Figures 8 and 9 illustrate the award amount and number of grants required, planned, and completed to reach OJP's and the COPS Office monitoring requirements for FY 2013.

FIGURE 8

FY 2013 OJP open, required, planned, and completed programmatic in-depth monitoring, by number of grants and award amount (in millions)

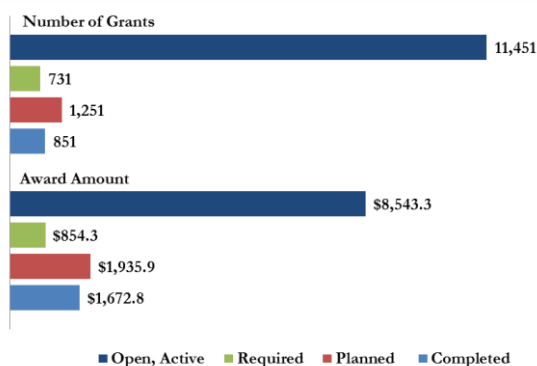
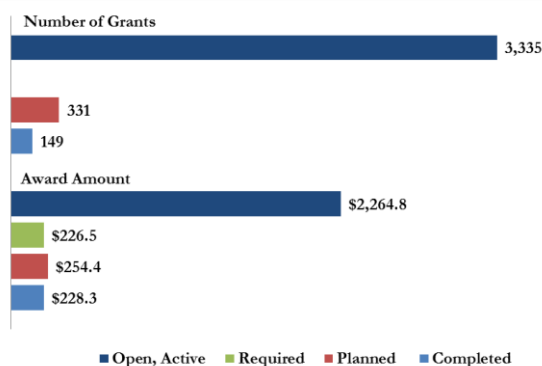


FIGURE 9

FY 2013 COPS Office open, required, planned, and completed programmatic in-depth monitoring, by number of grants and award amount (in millions)**



*The COPS Office's in-depth monitoring only included on-site reviews during FY 2013.

**The COPS Office does not have a requirement for number of grants to monitor.

Over the course of the fiscal year, because grants were added and removed from the plan as priorities shifted and areas of risk were identified or mitigated, OJP grant managers selected 1,404

⁸ In FY 2013, the COPS Office reduced its travel in an effort to be responsive to DOJ's request to limit travel across the agency due to sequestration.



grants for in-depth monitoring. Among the grants selected in the GAT, 797 (57%) were monitored and 607 (43%) of those selected were not monitored in FY 2013. Of those not monitored, 354 were changed to a “No” decision in the GAT, reflecting many grant managers’ use of the GAT to update and report their new decisions as changes arise. For the remaining 253 that were selected but not monitored, the decision to not monitor was never updated in the GAT. Finally, an additional 54 grants (6% of those monitored) were monitored during FY 2013, which program offices did not identify for monitoring in the GAT. These grants were not captured in the DOJ monitoring plan which is updated quarterly.

It is important to identify and record in the GAT which grants will be monitored, as these are subsequently included in the DOJ-wide plan, which allows for better planning, coordination, and collaboration across program offices and DOJ components. Equally important is holding grant managers accountable for their monitoring plans, so that grants are not removed from the plan without sound reasoning. In FY 2014, OAAM will closely monitor site visits and EPDRs initiated in GMS to determine those which were not identified for monitoring in the GAT.

5.3.2 Completed In-Depth Monitoring by Type

The EPDR process was established in FY 2011 as a remote in-depth monitoring alternative to address the significant reduction of travel funds as provided in the FY 2011 Continuing Resolution. In addition, in FY 2011, multi-office site visits (MOSVs) were created as a way to more efficiently monitor a larger number of grants with fewer resources at the grantee site, also allowing for the opportunity to identify systemic issues that maybe affecting grants across DOJ.

In FY 2013, more than two-thirds of the 851 OJP grants programmatically monitored were monitored through EPDRs (68% or 577 grants). This figure represents a 12 percentage point increase in the number of grants monitored through EPDR from FY 2012 to FY 2013. There was also a 6 percentage point decrease in the number of grants monitored through site visits from FY 2012 to FY 2013. The COPS Office performed all their in-depth monitoring through site visits on 149 grants with a total award amount of \$228.3 million in FY 2013. Table 10 breaks down the type of monitoring performed by both components.

TABLE 10

FY 2013 OJP and the COPS Office completed programmatic in-depth monitoring by type

	Number of Grants	Award Amount (in millions)
OJP		
EPDR	577	\$1,042.8
On-site Monitoring	188	\$442.4
MOSV	86	\$187.6
COPS Office		
On-site Monitoring	149	\$228.3

68%

of in-depth monitoring was conducted through EPDRs in FY 2013

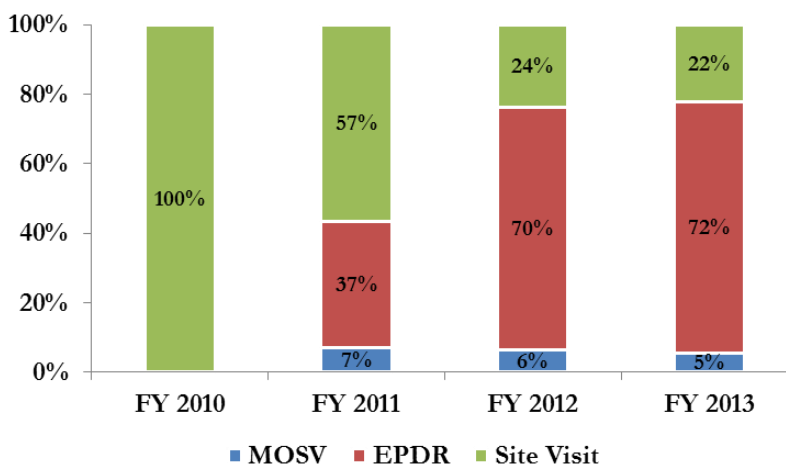
Over the last 4 fiscal years, OJP’s on-site monitoring has decreased from 1,447 awards receiving on-site monitoring in FY 2010 to 188 in FY 2013 (a 87% decrease). Figure 10 displays the shift



from traditional on-site monitoring to EPDRs and MOSVs by OJP over the past 4 fiscal years, as represented by submitted monitoring packages.⁹

FIGURE 10

Type of in-depth programmatic monitoring completed by OJP in FY 2010-2013, by percentage of monitoring packages



5.3.3 Joint Site Visits among OJP, COPS Office, and OCFO

Joint Site Visits and Multi-Office Site Visits

Joint Financial and Programmatic Site Visit – During the annual monitoring plan development, if a grantee has been identified as being selected by both a program manager and OCFO the offices will work together to coordinate the visit and review a limited sample of grants. Throughout the course of the year, grant managers can also request an OCFO financial monitor to accompany them on a visit if they have identified financial management concerns that need to be reviewed.

Multi-Office Site Visit – On-site, in-depth monitoring performed jointly by OCFO and more than one program office. Visits are determined at the start of each fiscal year by ranking the grantees that represent a high risk priority to DOJ based on the results of the risk assessment process. Typically all outstanding awards, or the most active awards for the program, are reviewed in a Multi-Office Site Visit. This process allows for a holistic review and identification of systemic issues that a grantee might be experiencing.

In FY 2013, DOJ continued to emphasize the planning and coordination of joint site visits across the grant-making components to maximize monitoring efforts and minimize the burden to the grantee. In FY 2013, OJP and OCFO conducted joint programmatic and financial monitoring site visits to 12 grantees, covering 65 grants and totaling \$235.8 million. Six of these grantee visits, covering 59 grants and \$130.0 million were conducted through MOSVs.

⁹ As part of the post-monitoring activities, grants managers must complete and submit a monitoring package that consists of a report (submitted internally) and post-monitoring letter to the grantee.



In FY 2013, OJP’s program offices and OCFO continued an effort started in FY 2011, which focuses joint programmatic and financial monitoring on grantees representing the greatest risk to DOJ. In FY 2013, while there was a slight increase in number of joint site visits from FY 2012, there was a 64% decrease in the number of grants jointly monitored and a decrease of 55% of the award amount jointly monitored from FY 2012. Table 11 details the joint monitoring completed by OJP and OCFO over the last 4 fiscal years.

TABLE 11

FY 2010, FY 2011, FY 2012 and FY 2013 joint monitoring by OJP program offices and OCFO

	FY 2010	FY 2011	FY 2012	FY 2013
Award amount monitored (in millions)	\$282.0	\$411.9	\$529.5	\$235.8
Number of grantees monitored	19	18	10	12
Number of grants monitored	40	164	181	65

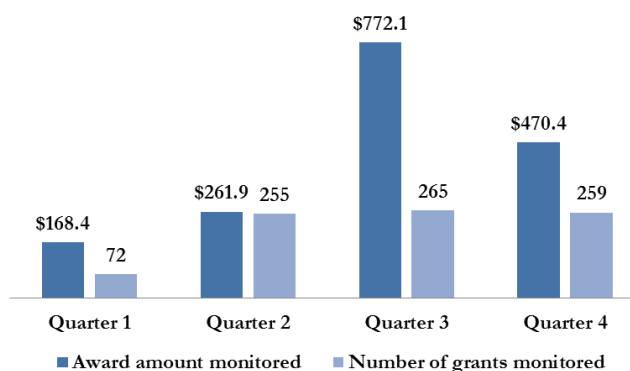
In FY 2013, OAAM conducted an analysis to identify grantees that had contact with more than one monitoring component in the same fiscal year which may have resulted in an undue burden for the grantee in terms of time and resources used to comply with the monitoring. OAAM found that of the 447 grantees monitored in FY 2013, 42 were visited by more than one OJP monitoring component outside of a planned joint site visit or MOSV. For the FY 2014 monitoring plan development, OAAM built a tracker to be used in conjunction with the existing GAT to facilitate better coordination between and among program offices and OCFO. The Monitoring Coordination Tracker includes all cases of overlap in plans between and among offices and OCFO and provides a shared space for offices to manage and document coordination efforts.

5.3.4 Quarterly In-depth Programmatic Monitoring Completed

OJP program offices and the COPS Office complete in-depth monitoring throughout the fiscal year. OAAM encourages program offices to conduct a percentage of monitoring early in the fiscal year so that potential problems can be identified and risk mitigated early in the grant cycle. Figures 11 and 12 show the number and dollar amount of awards monitored in each quarter of FY 2013. OJP program offices completed the least amount of monitoring in Q1 and the largest proportion in Q3, which can be seen in Figure 11.

FIGURE 11

FY 2013 OJP award amount (in millions) and number of grants programmatic monitored, by quarter.





As Figure 12 shows, the COPS Office completed the most monitoring in Q2 both in terms of number of awards and dollar amount monitored. The COPS Office did not complete any monitoring in Q3.¹⁰

Because each program office has different schedules and timelines for their various roles and duties, the timing of monitoring naturally varies. It is therefore particularly important for program offices to coordinate among themselves at the beginning of the year, during the initial monitoring plan period, to mitigate the potential burden on any grantee selected for monitoring by more than one office.

FIGURE 12

FY 2013 COPS Office award amount (in millions) and number of grants programmatically monitored, by quarter

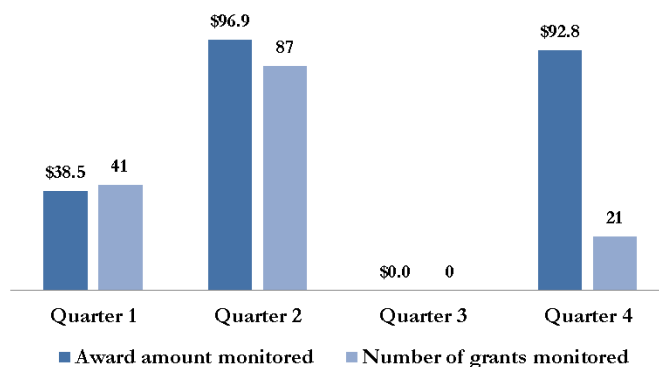
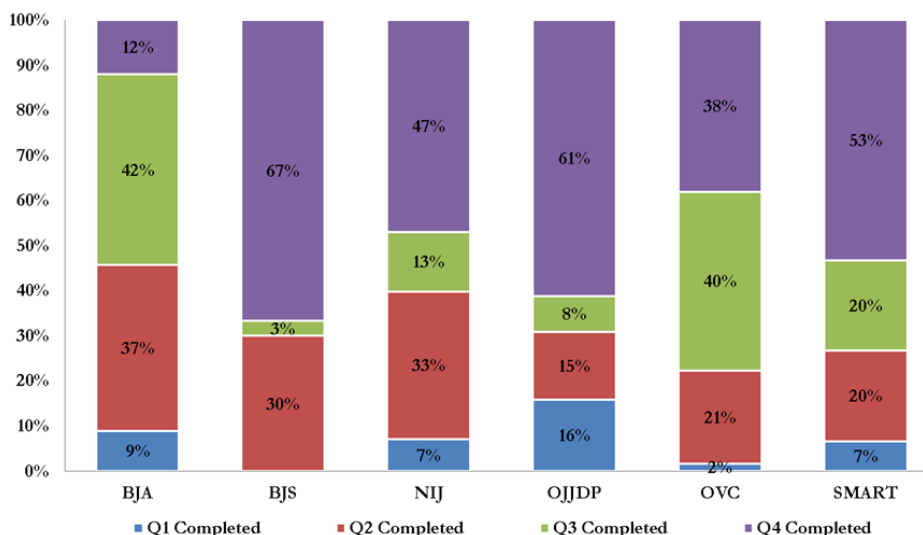


Figure 13 shows the quarterly monitoring percentages for each of the OJP program offices. BJS did not complete any monitoring in Q1. Additionally, BJS, OJJDP and SMART conducted more than half their in-depth monitoring in Q4. Both BJA and OVC concentrated their monitoring efforts in Q2 and Q3.

FIGURE 13

FY 2013 percent of total number of grants programmatically monitored each quarter, by OJP program office*



*The sum of the program office percentages do not total 100% due to rounding.

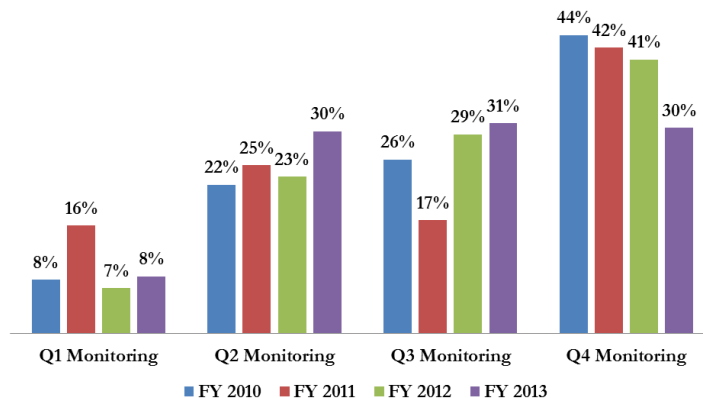
¹⁰ In FY 2013, the COPS Office reduced its travel in an effort to be responsive to DOJ's request to limit travel across the agency due to sequestration. During Q3 the COPS Office adjusted its plan accordingly.



The overall trends displayed in Figure 14—low monitoring in Q1, with the majority of monitoring taking place in the second half of the fiscal year—have remained consistent over the past 4 fiscal years, with two notable exceptions. Those exceptions are the first and third quarters of FY 2011. In FY 2011, OAAM provided monitoring priority scores and levels to the program offices prior to the beginning of the fiscal year, allowing grant managers to make plans prior to Q1 and therefore perform more monitoring in Q1. FY 2011 Q3 monitoring dropped off due to a travel freeze as a result of the continuing resolution.

FIGURE 14

OJP quarterly monitoring past 4 fiscal years, by percent of awards monitored



*The sum of the program office percentages do not total 100% due to rounding.

Increasing first quarter monitoring remains a priority for OJP so that potential problems can be identified and risk mitigated early in the grant cycle. OAAM will continue to explore methods to assist program offices in achieving this goal, including ensuring initial monitoring priority scores and levels are provided before the beginning of the fiscal year.

6. FY 2013 Focused Monitoring

6.1 Recovery Act Grant In-depth Monitoring

OJP Recovery Act Programmatic Monitoring Policy

OJP program offices are required to monitor 10% of the number of Recovery Act grants by program or one grant per program, whichever is greater, ensuring that in-depth monitoring is conducted for at least 30% of the amount of funds awarded over the lifetime of the Recovery Act program.

COPS Office Recovery Act Monitoring Goal

The COPS Office set a goal to conduct monitoring for at least 30% of the amount of funds awarded under the Recovery Act program by FY 2015, contingent on available staff resources.



Section Highlights

- ◆ OJP monitored (programmatically and/or financially) 84% of all funds awarded under the Recovery Act program from FY 2009 to FY 2013 totaling 2.3 billion (25% of its Recovery Act grants).
- ◆ The COPS Office has monitored 55% (programmatically and/or financially) of all funds awarded under the Recovery Act program from FY 2009 to FY 2013 (20% of its Recovery Act grants).

As of October 1, 2012, OJP had 2,260 open, active Recovery Act grants totaling \$2.2 billion, and the COPS Office had 834 totaling \$897.3 million. During FY 2013, OJP programmatically monitored 155 (7%) of open, active Recovery Act grants and \$327.0 million (15%) open, active Recovery Act funds.¹¹ The COPS Office monitored 23 (3%) of their open, active Recovery Act grants totaling \$80.2 million (9%). In addition, OCFO conducted financial monitoring for 22 OJP and the COPS Office Recovery Act awards totaling \$107.4 million in FY 2013.

Under the Recovery Act program, OJP program offices awarded 4,002 grants totaling \$2.8 billion. Since FY 2009, OJP has programmatically and/or financially monitored 25% (1,017 grants) of its Recovery Act grants and 84% (\$2.3 billion) of the awarded funds. Figure 15 below outlines OJP’s lifetime Recovery Act programmatic monitoring.

Also under the Recovery Act program, the COPS Office awarded 1,026 grants totaling \$988.1 million. Since 2009, the COPS Office has programmatically and/or financially monitored 20% (207 grants) of these grants and 55% (\$539.9 million) of the awarded funds. Figure 16 below outlines the COPS Office’s lifetime Recovery Act monitoring.

FIGURE 15

OJP Recovery Act completed lifetime programmatic and/or financial monitoring

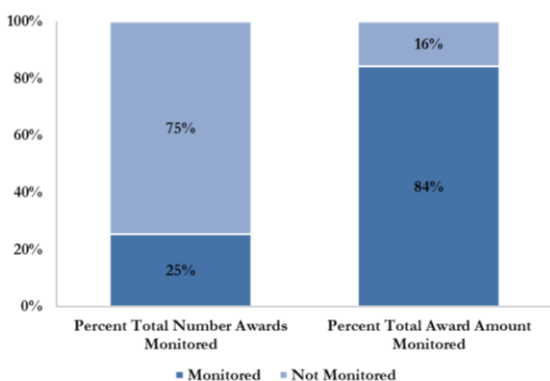
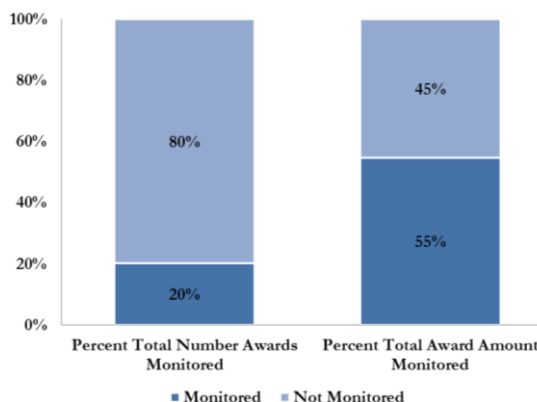


FIGURE 16

COPS Office Recovery Act completed lifetime programmatic and/or financial monitoring



¹¹ During the course of FY 2013, 99.5 percent of remaining OJP Recovery Act grants closed. Additionally, the majority of Recovery Act grants had already been monitored before FY 2013.



In analyzing OJP's Recovery Act monitoring, OAAM noted a large difference between the award amount monitored and number of awards monitored. OJP programmatically monitored 82% of total Recovery Act funds, which represented 24% of total number of awards. OAAM noted that the difference between the number of awards and the total award amount monitored is due in large part to the number of awards under BJA's Local JAG program.

Awards granted under the BJA Local JAG program comprise over three quarters of OJP's Recovery Act awards; on average, Local JAG grants have lower dollar amounts, with more than half of the grants valued under \$50,000. Of the 4,002 OJP Recovery Act Awards, 3,317 (83%) were awarded under the Local JAG program. However, these 3,317 awards only totaled \$752.0 million, or 27%, of OJP's total Recovery Act funds awarded. BJA monitored 19% of Local JAG Recovery Act awards and 66% of the awarded funds.

To get a better understanding of the monitoring activity for other Recovery Act programs, OAAM examined data which excluded the Local JAG program data. When removing the awards under BJA's Local JAG program from the monitoring calculations, it showed that OJP programmatically monitored 55% of the total number of awards from the remaining Recovery Act grant programs. This is an important differentiation as it shows that more than half the number of grants were monitored across those Recovery Act programs. Figures 17 and 18 break down these figures and compare OJP Recovery Act monitoring with and without the Local JAG program.

FIGURE 17

OJP Recovery Act completed lifetime programmatic grant monitoring with and without JAG Local Program

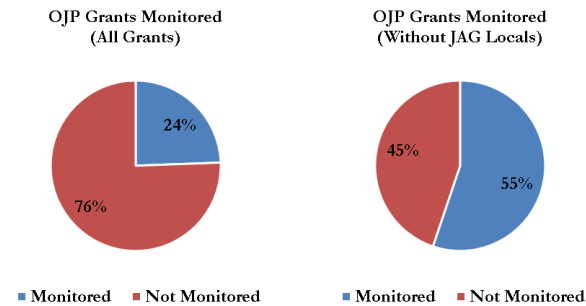
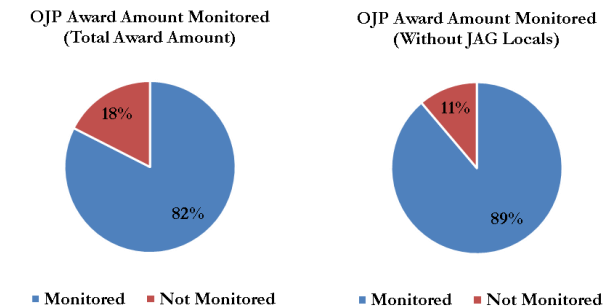


FIGURE 18

OJP Recovery Act completed lifetime award amount programmatic monitoring with and without JAG Local Program





6.2 DOJ High-Risk Grantees

DOJ's High Risk Designation Policy

DOJ designates grantees as high risk based on a number of factors in accordance with criteria established in 28 CFR 66.12, OJP Order 2900.2 and Chapter 10 of the Grant Manager's Manual. (This designation is not related to the high priority designation assigned grants for purposes of monitoring.) OAAM's Audit and Review Division manages DOJ's high risk program on behalf of the OJP, the COPS Office, and OVW. This entails coordinating the high-risk grantee list and working to either resolve the issues underlying the high-risk designation or impose conditions on high risk grantees to ensure appropriate stewardship of federal funds and enhance programmatic results.

Grantees on the DOJ High-Risk List are given priority for in-depth monitoring. Grantees with outstanding audit issues or identified risk factors (e.g., new grantees, ongoing reporting non-compliance) can benefit from direct programmatic and/or financial technical assistance to resolve issues and work toward mitigating potential or actual risks.

Section Highlight

Among the 31 active grantees on the DOJ High Risk List at the beginning of the fiscal year, OJP, the COPS Office, and OCFO have programmatically and/or financially monitored 22 of these grantees (71%) over the past 4 fiscal years.

OJP and the COPS Office had 31 grantees with 234 active grants totaling \$350.9 million on the DOJ High-Risk List at the beginning of FY 2013. At the end of the fiscal year, OJP and the COPS Office had conducted in-depth programmatic monitoring for 6 high-risk grantees, which included 8 grants totaling \$2.0 million. OCFO completed financial monitoring on 2 grantees with 5 grants totaling \$1.9 million.

OAAM conducted analysis on monitoring of grantees on the DOJ High-Risk List during the last 4 fiscal years to determine if monitoring is occurring for these grantees. Among the 31 active grantees on the DOJ High-Risk List at the beginning of the fiscal

year, OJP, the COPS Office, and OCFO have programmatically and/or financially monitored 22 of these grantees (71%) over the past 4 fiscal years.

6.3 OJP Program Office Desk Reviews

OJP Desk Review Policy

OJP program offices must complete a desk review for each open, active grant at least once annually.

Section Highlight

In FY 2013, OJP grant managers conducted desk reviews on 10,660 grants, or 100% of grants requiring an annual desk review.

OJP program offices conduct annual desk reviews on all active grants to assess progress toward stated project goals and objectives, and to review grantee submitted reports and other information in the existing grant file to determine programmatic and administrative compliance. In FY 2013, OJP grant managers conducted desk reviews on 10,660 grants, or 100% of grants requiring an annual desk review. This is the first year in which



OJP program offices have completed 100% of the required desk reviews. Table 12 below shows the number of desk reviews performed by each office.

Figure 19 below highlights the quarters that each program office performed their desk reviews. OJJDP, BJA and OVC completed most of their desk reviews by the end of Q2 (97%, 84%, and 75%, respectively). BJS and the SMART Office did not perform any of their desk reviews in Q1, and completed most (73% and 86%, respectively) of their desk reviews in Q4. Although NIJ performed 31% of their desk reviews in Q1, nearly 50% were completed in in Q4. OAAM places a priority on performing desk reviews on grants early in the fiscal year. It is important to perform this basic level of monitoring early so that potential risks can be identified and addressed early and in-depth monitoring can be planned and performed accordingly.

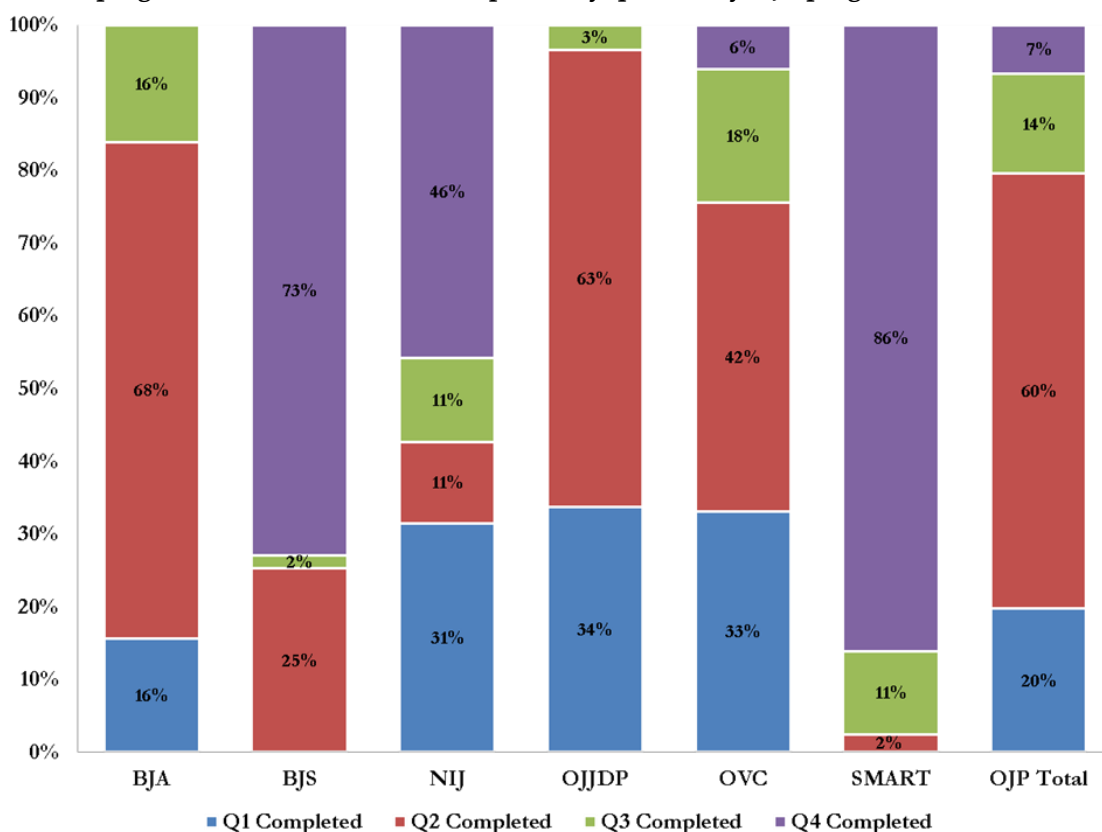
TABLE 12

FY 2013 desk reviews by program office

Program Office	Completed Desk Reviews
BJA	7,468
BJS	226
NIJ	907
OJJDP	1,462
OVC	474
SMART	123
Total	10,660

FIGURE 19

FY 2013 programmatic desk reviews completed by quarter, by OJP program office*



*The sum of the program office percentages do not total 100% due to rounding.



6.4 In-depth Monitoring Package Submission/Approval Delinquencies

OJP In-Depth Monitoring Documentation Policy

OJP policy states that grant managers submit, and first-line supervisors (FLS) approve, in GMS, a site visit/enhanced programmatic desk review (monitoring) package, which consists of a report, completed checklist, supporting documentation and a post-monitoring letter. Monitoring packages must be submitted and approved within 45 days of the review, as grantees do not receive official notification of the results of the review until the package is approved in GMS.

Section Highlight

In FY 2013, a little under half (46%) of all OJP programmatic in-depth monitoring packages were delinquent during the course of the year.

In FY 2013, 46% of all OJP programmatic monitoring packages were submitted and/or approved after the 45-day deadline.¹² BJA (62%) and OJJDP (53%) had the highest percentage of late packages. Among the 247 delinquent packages, 84% were submitted by the grant manager to the first-line supervisor (FLS) after the 45-day deadline. The remaining 40 packages were submitted to the FLS within 45 days of the review end date, but were approved after the 45-day deadline. However, 17 (43%) of these packages were submitted on the 40th day or later. On

average, across OJP program offices, it takes 6 days from grant manager submission to FLS approval. Table 13 below displays the distribution of monitoring package delinquencies.

TABLE 13

FY 2013 OJP number of delinquent monitoring packages, by program office

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Package Delinquency							
Total number of completed monitoring packages	310	16	71	74	50	13	534
Total number of delinquent monitoring packages	193	3	8	39	4	0	247
Percent of delinquent monitoring packages	62%	19%	11%	53%	8%	0%	46%
Role Duration							
Number of packages with grant manager >45 days	160	3	6	34	4	0	207
Number of packages submitted to FLS but not approved within 45 days	33	0	2	5	0	0	40

¹² Note that due to the shutdown of many federal government offices at the beginning of FY 2014, OJP offices were closed from October 5 - October 17, 2013. Therefore, grant managers whose site visits ended on August 21 - October 5 were given an additional 12 days to complete their monitoring packages to compensate for the loss in time. The figures reported in this section take this adjustment into account.



Table 14 displays the number of days delinquent monitoring packages were submitted after the 45-day deadline. Of the 247 delinquent packages, 84 (34%) were submitted within 2 weeks after the 45-day deadline. All packages were submitted within 6 months of the 45-day deadline.

TABLE 14

FY 2013 range of submission (measured from 45-day timeframe) for delinquent monitoring packages, by program office

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Less than 2 weeks	57	3	3	18	3	0	84
2 weeks to 1 month	57	0	3	13	0	0	73
1-3 months	77	0	2	6	0	0	85
3-6 months	2	0	0	2	1	0	5
Total of Delinquent Packages	193	3	8	39	4	0	247

Figure 20 illustrates the trend in delinquent monitoring packages over the past 4 fiscal years. In FY 2010, 224 (38%) of monitoring packages were approved after the 45-day timeframe. That number increased to 244 (48%) in FY 2011, even as the number of packages submitted fell that year. In FY 2012, the number of delinquent packages again increased to 329 (51%). In FY 2013, the number of delinquent packages decreased 25% to 247 submitted after the 45-day timeline. These 247 delinquent packages represent 46% of submitted packages.

Figure 21 breaks down the delinquencies over the last 3 years by program office. As illustrated below, many program offices saw a decrease in delinquencies except for BJS and OVC, which each saw four percentage point increases. While BJA and OJJDP saw a reduction in delinquencies from FY 2012, they still had a higher proportion of delinquencies than previous years and represent the majority of OJP delinquent monitoring packages. Overall, OJP saw a decrease in percent of delinquent site visit packages.

FIGURE 20

OJP totals of delinquent monitoring packages from FY 2010 to FY 2013

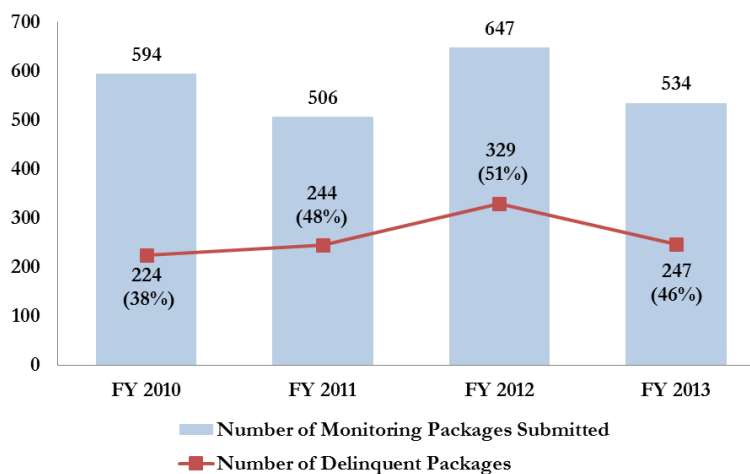
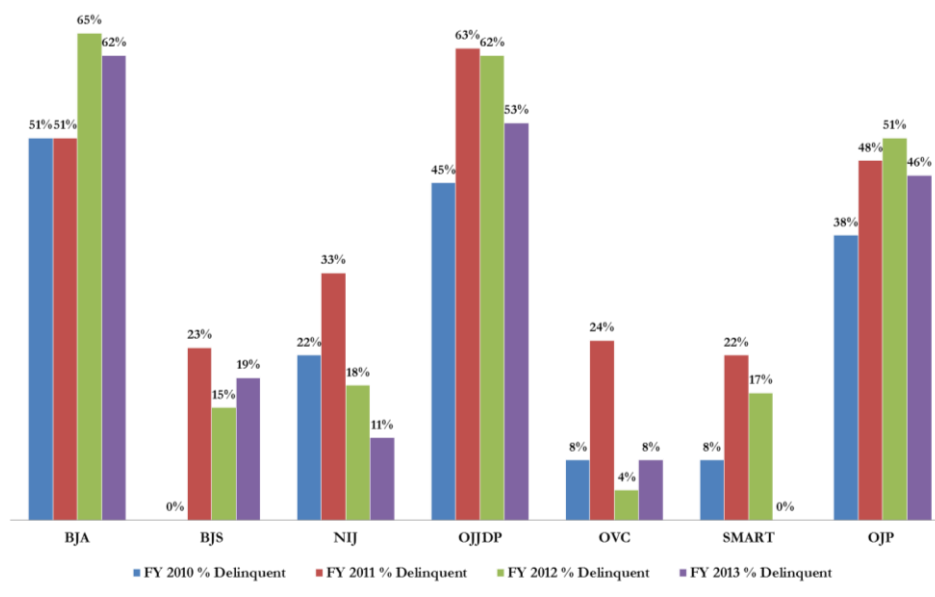




FIGURE 21

Delinquent monitoring packages in FY 2010 to FY 2013



6.5 Issues for Resolution

Section Highlight

Issues for resolution were identified in 19% of OJP grants programmatically monitored.

After in-depth programmatic monitoring is conducted, OJP grant managers must record issues for resolution, defined as any issues requiring corrective action on the part of the grantee, in GMS. These issues are tracked in GMS until they are resolved by the grantee. Table 15 shows the number of OJP grants with issues for resolution (each grant can have multiple issues) and their respective program offices. Grant managers identified issues for resolution for 19% of the total number of grants monitored. OVC found the highest percent of grants with issues identified, while OJJDP recorded the least issues for resolution for its monitored grants.¹³

TABLE 15

FY 2013 OJP grants with issues for resolution, by program office

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Total of Grants Monitored	448	30	98	139	121	15	851
Number of grants monitored with issues for resolution	76	5	16	7	58	3	165
Percent of grants monitored with issues for resolution	17%	17%	16%	5%	48%	20%	19%
Total number of issues for resolution identified for monitored grants	160	7	26	10	116	9	328

¹³ This data is not indicative that OVC grants have more issues to address than other programs. Grants without issues for resolution may indicate that a grantee is successfully administering its grants or that the grant managers did not identify any substantive issues.



Figure 22 illustrates OJP program offices' issues for resolution reporting over the last four fiscal years by the total number of issues identified and the number of grants with issues for resolution against the total number of grants monitored each fiscal year.

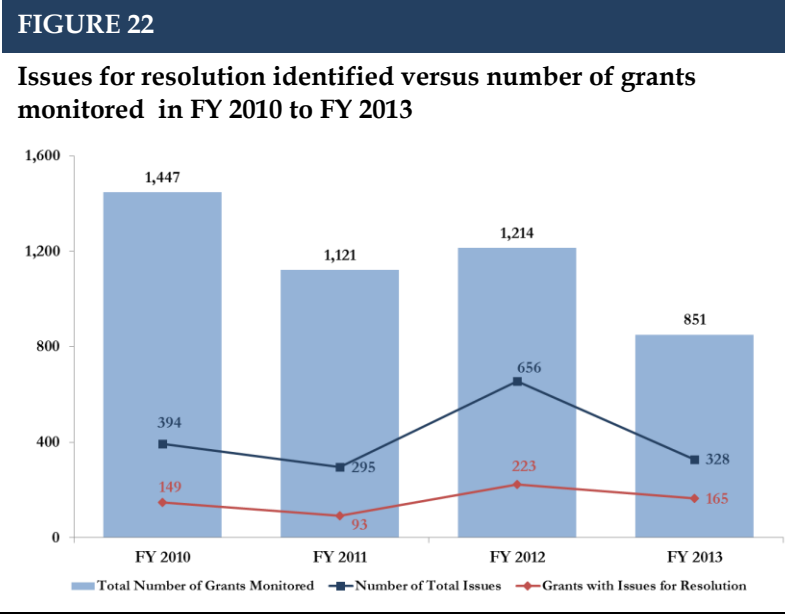


Table 16 illustrates the trend in reporting of issues for resolution over the past 4 fiscal years by program office. BJS, NIJ, and OVC have seen a significant increase in issues identified, while OJJDP's issues identified decreased significantly.

This increase could be attributed to OJP's revisions to the in-depth monitoring checklist in FY 2012, which provided an enhanced framework for documenting activities and information reviewed by grant managers.

Issues for resolution stem from problems identified during financial, administrative, or programmatic review. Financial review requires grant managers to examine grantees' budgets, expenditures, and other financial documents. Administrative review requires grant managers to address grantees' compliance with grant terms and conditions, and reporting requirements. This includes ensuring compliance with statutory regulations and ascertaining that GMS and the grant manager's working files have complete documentation.

Programmatic review consists of grant managers reviewing grantees are implementation of programs and assessing whether the purpose, objectives, and timeliness of the grant are being met.

TABLE 16
Percent of grants with issues for resolution identified by OJP program offices in FY 2010, FY2011, FY 2012, and FY 2013

	FY 2010	FY 2011	FY 2012	FY 2013
BJA	6%	6%	15%	17%
BJS	6%	0%	0%	17%
CCDO*	24%	0%	--	--
NIJ	10%	17%	8%	16%
OJJDP	16%	9%	25%	5%
OVC	4%	14%	17%	48%
SMART	0%	7%	21%	20%
Total	10%	8%	18%	19%

*Federal funding reductions in FY 2011 included CCDO's Weed and Seed Program. Without funding for this program, the CCDO closed and on June 6, 2011, all remaining active CCDO grants were transferred to BJA.

Table 17 below categorizes issues for resolution identified in FY 2013 under the three types of reviews. Programmatic issues accounted for 48% of all identified issues for resolution, while 30%



were administrative issues, and 21% were financial issues. There was a significant increase in the percent of programmatic issues found (48% from 29%).

TABLE 17

FY 2013 OJP grants with issues for resolution, by type of issue and program office

	BJA	BJS	NIJ	OJJDP	OVC	SMART	Totals
Number of grants with financial issues	40	3	10	1	10	5	69
Number of grants with administrative issues	69	3	4	7	16	1	100
Number of grants with programmatic issues	51	1	12	2	90	3	159
Total number of issues for resolution for monitored grants	160	7	26	10	116	9	328

OAAM reviewed the documented issues for resolution to better understand how they were being identified and recorded by grant managers. Of the 109 grant managers who completed in-depth monitoring activities in FY 2013, 48 (44%) reported issues for resolution in GMS. This is an improvement over FY 2012, in which 30% of grant managers identified issues for resolution, and FY 2011, in which only 17% of grant managers identified issues for resolution. OAAM will continue to review how grant managers are identifying and recording issues for resolution throughout FY 2014 and identify areas for training or technical assistance to OJP grant managers.

6.6 OCFO Financial Monitoring Top Findings

During FY 2013, OCFO conducted desk reviews of 490 grants, and 48 on-site reviews of 356 grants.¹⁴ No significant weaknesses were identified for 30 of the grants reviewed on-site (8%). However, for the remaining 326 grants reviewed (92%), at least one reportable finding was issued. The top 10 findings noted include:

1. Procedures not documented or need improvement for 168 grants (47%)
 - Sub-grantee monitoring for 77 grants (22%)
 - Accounting for 39 grants (11%)
 - Payroll for 31 grants (9%)
 - Procurement for 21 grants (6%)
2. FFR's do not reconcile to grantee's accounting records for 50 grants (14%)
3. Unauthorized costs for 42 grants (12%)
4. Unsupported costs for 40 grants (11%)
5. Conference related costs not tracked separately for 24 grants (7%)
6. FFR not submitted in a timely manner for 24 grants (7%)
7. Progress reports not submitted in a timely manner for 23 grants (6%)
8. Budget category expenditures not properly tracked for 21 grants (6%)

¹⁴ These totals include OJP, COPS Office, and OVW grants.



9. Audit report package not received at the Federal Audit Clearinghouse for 15 grants (4%)
10. Excess cash-on-hand identified for 15 grants (4%)

In total, OCFO identified 1,021 weaknesses and \$24.5 million in questioned costs in the 846 grants reviewed. Out of the \$24.5 million in questioned costs, \$14.6 million (approximately 60%) remained open as of September 30, 2013. For the identified weaknesses, OCFO provided on-site technical assistance to the grantee, identifying the reason(s) for the weaknesses when feasible, and recommending solutions to correct the weaknesses. In addition, the reviewer provided support in applying the OJP Financial Guide and other financial policies. This advice assisted grantees in developing procedures needed to correct the noted weaknesses.

7. FY 2014 Focus Areas

In an effort to build on the FY 2013 accomplishments, continuously improve monitoring standards and procedures, and respond to issues identified throughout the year, OAAM has identified several areas for improvement of monitoring activities in FY 2014.

- ◆ OAAM and OCFO developed a comprehensive risk action plan to further identify and mitigate risk, with specific emphasis on identifying potential risk associated with non-profit and for-profit organizations. This plan identified the following goals, and associated implementation activities and milestones:
 - Acquire audit findings in a timelier manner and utilize finds to identify potential grantee financial risk.
 - Enhance grantee capabilities to implement sound financial management and proper internal control practices through proper training and technical assistance.
 - Strengthen OJP's ability to identify risk by improving its risk based approach at the grant, grantee, program, and enterprise level.
 - Augment existing monitoring and audit resolutions activities to aid in proactively mitigating grantee financial management issues.
- ◆ OAAM piloted its In-Depth Monitoring Quality Review Process, which was used to assess the adequacy and quality of OJP and the COPS Office's in-depth monitoring activities. The quality review process involves a thorough assessment of the entire monitoring package, including the completeness of required elements, the adequacy of the analysis presented in the report, and the evaluation of supporting documents.
- ◆ To improve the grant monitoring process and increase compliance with OJP and the COPS Office monitoring policies, OAAM will use the results of the Quality Review Pilot to develop training, including, how to use the OJP in-depth monitoring checklists to document findings; what constitutes sufficient and appropriate documentation; improving how monitoring reports are written; roles and responsibilities of first line supervisors; and the grant managers role in subrecipient monitoring activities.



- ◆ OAAM will continue to focus on coordination within and among the bureaus and program offices relating to the scheduling of multiple reviews for the same grantees. While OJP has improved its coordination among program offices and OCFO, OAAM continues to identify lack of coordination among program offices, and many times within program offices.
- ◆ OAAM will continue to find ways to provide information to program office leadership around delinquent in-depth monitoring packages submitted in GMS. Four-year trend analysis as well as findings from OJP's A-123 internal control reviews indicate a continuous level of delinquency. This is a concern due to the fact that the grantee does not receive communication regarding the review until the package is approved in GMS.
- ◆ OAAM will continue to provide OJP program offices and the COPS Office with quarterly monitoring performance metrics and hold periodic Monitoring Working Group meetings to continually solicit feedback from each of OJP's program offices and the COPS Office.
- ◆ OAAM will finalize its review of the COPS Office monitoring policies and procedures which was conducted to ensure a thorough understanding of their adequacy in addressing basic monitoring requirements.



Appendix

Appendix A. FY 2013 Risk Criteria Breakdown

The table below details the breakdown of risk scores applied to the landscape of OJP grants during the initial risk assessment at the beginning of FY 2013.

	Score	Number of Awards	Percent of Awards
Award Type			
Formula	0	7,084	62.8%
Discretionary	2	2,355	20.8%
Cooperative Agreement	4	1,360	12.0%
Earmark	4	488	4.3%
Grantee Type			
State	0	2,538	22.5%
Higher Education	2	452	4.0%
Municipality	2	6,743	59.7%
Non-Profit	2	924	8.2%
Tribal	4	524	4.6%
For-Profit	4	85	0.8%
Other	4	21	0.2%
Award Amount*			
<\$250,000	0	6,091	64.4%
≥\$250,000 - <\$1M	2	2,683	28.4%
≥\$1M	4	683	7.2%
State Administering Agency			
No	0	9,457	83.8%
Yes	2	1,830	16.2%
New Grantee			
No	0	10,674	94.6%
Yes	6	613	5.4%
New Program			
No	0	11,256	99.7%
Yes	4	31	0.3%
High-Risk Grantee			
No	0	11,080	98.2%
Yes	6	207	1.8%
Recovery Act Award			
No	0	9,032	80.0%
Yes	4	2,255	20.0%
JAG Disparate Jurisdiction			
No	4	11,004	97.5%
Yes	0	283	2.5%
Confidential Funds			



	Score	Number of Awards	Percent of Awards
No	0	11,122	98.5%
Yes	6	165	1.5%
Matching Funds			
No	0	10,678	94.6%
Yes	3	609	5.4%
Fiscal Integrity Review Referral			
No	0	11,287	100.0%
Yes	4	0	0.0%
Award Open > 4 Years			
No	0	10,976	97.2%
Yes	4	311	2.8%
Award has Unobligated Balance 2 Years After Start Date			
No	0	9,914	87.8%
Yes	4	1,373	12.2%
Grant Has No Financial Clearances**			
No	0	11,287	100.0%
Yes	6	0	0.0%
Number of No-cost Extensions Approved			
0	0	8,885	78.7%
1-2	2	2,132	18.9%
3+	4	270	2.4%
Number of Delinquent FFRs			
0	0	7,553	66.9%
1	3	1,339	11.9%
2+	6	2,395	21.2%
Number of Delinquent Progress Reports			
0	0	9,000	79.7%
1	3	1,981	17.6%
2+	6	306	2.7%
Active Withholding of Funds			
No	0	9,708	86.0%
Yes	4	1,579	14.0%
Program Income***			
No	0	4,952	97.3%
Yes	6	136	2.7%
Excess Cash***			
No	0	4,809	94.5%
Yes	6	279	5.5%
1512 Non-Filer (most recent reporting period)			



	Score	Number of Awards	Percent of Awards
No	0	11,261	99.8%
One Time Non-Reporter	3	20	0.2%
Two Time Non-Reporter	6	6	0.1%
Recent Programmatic Site Visit (Past 2 FYs)			
No	0	10,239	90.7%
Yes	-2	1,048	9.3%
Programmatic Issue for Resolution More than 1 Year Old			
No	0	11,268	99.8%
Yes	6	19	0.2%
Recent OCFO Site Visit (Past 2 FYs)			
No	0	10,896	96.5%
Yes	-2	391	3.5%
Financial Issue for Resolution More than 1 Year Old			
No	0	11,257	99.7%
Yes	6	30	0.3%
OIG Audit (Past 2 FYs)			
No	0	11,259	99.8%
Yes	-1	28	0.2%

*SAAs exempted from this criteria; do not appear in totals

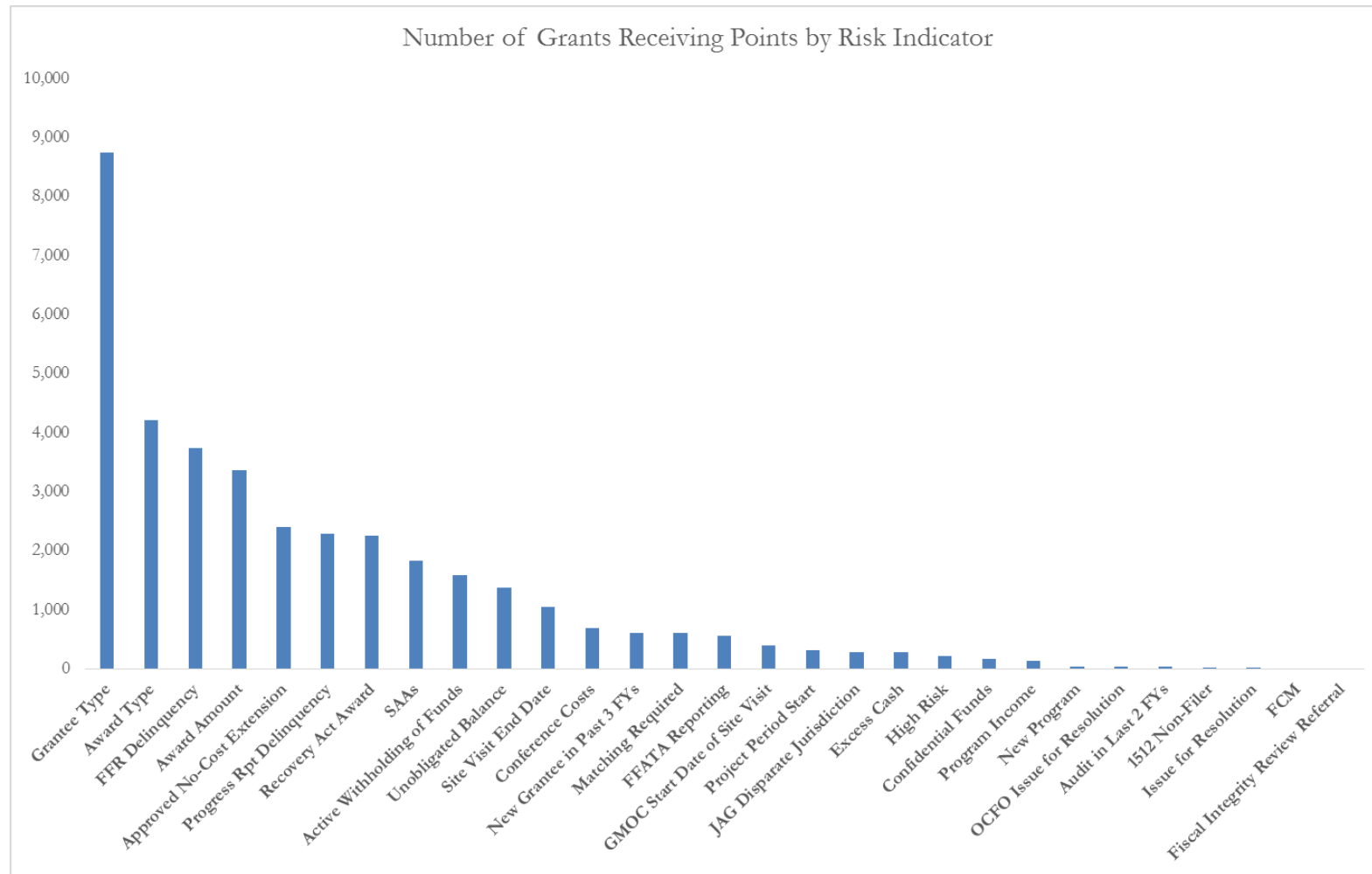
**Criteria does not apply in Q1

***JAG/JABG awards exempted from this criteria; do not appear in totals



Appendix B. Number of Grants Receiving Points by Risk Indicator

The chart below displays the number of grants that received points for each risk criteria. All risk criteria are used to assess grants and calculate a total score.





Appendix C. Magnitude of Risk Criteria by Total Points

The chart below displays the distribution of total points by risk criteria. Criteria are weighted and some, including recent monitoring, may subtract points from a total score.

