



U.S. Department of Justice  
Office of Justice Programs  
Office of Community Oriented Policing Services  
Office on Violence Against Women

# **DOJ Study to Determine the Extent of Unnecessary Duplication Among its Grant Awards - Phase II**

March 2016

***Final Report***



# DOJ Study to Determine the Extent of Unnecessary Duplication Among its Grant Awards

## About OAAM

The Office of Audit, Assessment, and Management (OAAM) was established by Public Law 109-162 to: ensure financial grant compliance and auditing of OJP's internal controls; conduct programmatic assessments of DOJ grant programs; and act as a central source for OJP grant management policy.

## Program Assessments

OAAM's Program Assessment Division researched and wrote this report. This Division conducts assessments of grants, grant programs, and grant oversight processes to determine grantee compliance, gauge grantee performance, and make recommendations to improve grant monitoring and oversight practices.

OAAM assessments provide targeted, timely, and practical feedback to the Department of Justice's grant-making components. The assessments provide information on program performance to identify successes, weaknesses, and opportunities for improvement. OAAM makes recommendations and works with offices to resolve identified issues.

## Executive Summary

### What OAAM Did

This Phase II study was conducted by OAAM as a follow up to DOJ's December 2013 study to determine the extent of overlap among its grant programs, in which DOJ found the degree of overlap in its grant programs to be relatively low.<sup>1</sup> This study specifically examined the extent, if any, of unnecessary duplication occurring at the grant award level among FY 2012 awards for the Office of Justice Programs, the Office on Violence against Women, and the Office of Community Oriented Policing Services. For the purposes of this study, unnecessary duplication is defined as a single grantee receiving federal funds from more than one federal source and using those funds for one or more identical cost items. The objectives of this study were to:

- 1) Determine if DOJ funded potentially duplicative activities for grantees receiving multiple prime awards and/or subawards in FY 2012. If potential unnecessary duplication was found in the award application, determine if actual unnecessary duplication occurred among the grantee's prime awards and sub awards.
- 2) Validate the results of Phase I by determining whether unnecessary duplication occurred at the

<sup>1</sup>Program overlap occurs when multiple granting agencies or grant programs have similar goals, engage in similar activities or strategies to achieve these goals, or target the same or similar beneficiaries.



award level within programs where the extent of overlap fell in the medium to high range.

The FY 2012 awards were grouped into three populations from which samples were selected for review:

- Prime Awards Population: Grantees who received more than one prime award from the program offices.
- Prime and Subawards Population: Grantees who received at least one prime award and one subaward from the program offices.
- Phase I High/Medium Solicitations Population: Grantees who had awards across a solicitation combination in the high or medium range from the Phase I analysis.

Among each sample population, grantees with multiple FY 2012 prime awards or a grantee with an FY 2012 prime award and subaward were selected to examine their grant applications, grant project narratives, and grant adjustment notices for potential unnecessary duplication. The total sample included 219 grantees and 826 prime awards and subawards that were reviewed.

### **What OAAM Found**

Based on the awards that were reviewed, no unnecessary duplication occurred among the sample of grant applications from the FY 2012 prime awards and subawards. However, although none of the awards were ultimately determined to have unnecessary duplication, OAAM initially found 44 grantees that had items in their applications that were potentially duplicative in the areas of personnel, travel, and project activities. The grant managers for these grantees were contacted to provide additional detail, and after further analysis, no actual unnecessary duplication was found.



## Introduction

The Department of Justice (DOJ) has three grant-making components: the Office of Justice Programs (OJP), comprised of six bureaus and program offices; the Office on Violence against Women (OVW); and the Office of Community Oriented Policing Services (COPS Office). These agencies are responsible for awarding federal financial assistance to support law enforcement and public safety activities in state, local, and tribal jurisdictions; assist victims of crime; provide training and technical assistance; conduct research; and implement programs that improve the criminal, and juvenile justice systems.

The Office of Justice Programs and its six program offices provide innovative leadership to federal, state, local, and tribal justice systems, by disseminating state-of-the-art knowledge and practices across America, and providing grants for the implementation of these crime-fighting strategies. OJP awards grants to improve the nation's capacity to prevent and control crime, improve the criminal and juvenile justice systems, increase knowledge about crime and related issues, and assist crime victims. OJP's bureaus and program offices consist of the Bureau of Justice Assistance (BJA); the Bureau of Justice Statistics (BJS); the National Institute of Justice (NIJ); the Office of Juvenile Justice and Delinquency Prevention (OJJDP); the Office for Victims of Crime (OVC); and the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART Office).

The Office on Violence against Women provides federal leadership in developing the nation's capacity to reduce violence against women and administer justice for and strengthens services to victims of domestic violence, dating violence, sexual assault, and stalking. OVW administers financial and technical assistance to communities around the country to facilitate the creation of programs, policies, and practices aimed at providing victims of domestic violence, sexual assault, dating violence, and stalking with the protection and services they need to pursue safe and healthy lives and enable communities to hold offenders accountable for their violence.

The Office of Community Oriented Policing Services advances the practice of community policing in the nation's state, local, territory, and tribal law enforcement agencies. The COPS Office awards grants to assist law enforcement agencies in hiring community policing officers, to acquire new technologies and equipment, to hire civilians for administrative tasks, and to promote innovative approaches to solving crime.

Collectively, OJP's bureaus and program offices, OVW, and the COPS Office are referred to as *program offices* in this report. While the core missions of the program offices differ, their programs may involve similar subject matters, engage in similar strategies or activities to achieve program goals, or target the same beneficiaries. This potential overlap in grant programs is expected as public-safety grant programs are inherently linked by the nature of our



justice system. Grantees are encouraged to leverage resources among grant programs to maximize their program's effectiveness.<sup>2</sup> However, programmatic overlap creates the potential for duplication among grant awards – intended or unintended, appropriate or unnecessary. The Government Accountability Office (GAO) first raised concerns about the potential for overlap and duplication within DOJ programs during a review in 2012. In conducting its review, GAO examined all 253 of DOJ's Fiscal Year (FY) 2010 solicitations and stated in the report it found that the solicitations overlapped across the 10 key justice areas.<sup>3,4</sup> In addition, GAO concluded that, based on its review, DOJ was not well positioned to identify and describe areas that could potentially lead to unnecessary duplication across its grant programs because DOJ had not conducted a formal study of its grant programs. The results of that review were released in its July 2012 report, *Justice Grant Programs: DOJ Should Do More to Reduce the Risk of Unnecessary Duplication and Enhance Program Assessment* (GAO-12-517). The report recommended that DOJ conduct a study to examine the extent of overlap and duplication among its grant programs.

In response to GAO's review, DOJ undertook a study to examine the extent of overlap across and among its grant programs. OJP's Office of Audit, Assessment, and Management (OAAM) was selected by the Department's Office of the Associate Attorney General to facilitate the effort. The goal of DOJ's study was to determine both the extent to which DOJ grant programs overlap and any potential unnecessary duplication resulting from existing overlap. Overlap occurs when two or more program offices announce program funding solicitations for programs with similar program goals, objectives, activities, eligible applicants, and/or beneficiaries of the program. To accomplish this goal, the study was divided into two phases. **Phase I** of the study was designed to identify the extent of overlap among DOJ FY 2012 programs through a review of solicitations released by OJP, OVW, and the COPS Office (hereafter referred to as "the program offices"). The results of Phase I were reported in OAAM's report, *DOJ Study to Determine the Extent of Overlap among its Grant Programs* (December 2013). This report presents information and findings from **Phase II** of the study, which was designed to identify the extent, if any, of unnecessary or impermissible duplication occurring at the award or subaward level within DOJ's FY 2012 grant awards.

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<sup>2</sup> See Appendix A for examples of leveraging resources.

<sup>3</sup> The 10 key justice areas identified by GAO were: victim assistance; technology and forensics; juvenile justice; enhancing policing; justice information sharing; courts; community crime prevention strategies; mental illness, substance abuse, and crime; corrections, recidivism, and reentry; and multi-purpose. Multipurpose solicitations were solicitations for grants that addressed more than one justice area within a single solicitation.

<sup>4</sup> While DOJ shares the goal of eliminating unnecessary duplication, it did not agree with the way in which the GAO made its determination about potential overlap and duplication. In particular, DOJ was concerned that the 10 key justice areas that GAO developed were too broad and generic to accurately detect potential overlap. DOJ also asserted that it was misleading to conclude that solicitations listed within the same broad categories had programs that potentially overlapped, contributing to duplicative grant awards.



## Background

In November 2012, DOJ began its study on potential duplication and overlap across OJP, OVW, and COPS Office programs. The study, which was facilitated by OAAM, was divided into two phases. As mentioned, the purpose of the Phase I study was to examine the extent of overlap within and across the program offices' grant programs to better understand the areas in which the components may be awarding funds for similar purposes or targeting the same beneficiaries. The study was designed to obtain information to be used by the grant components for such purposes as determining whether any particular area of existing overlap was undesirable, enhancing coordination among complementary programs, and identifying priority funding areas. The overall intent of the study was to enable the Department to implement approaches to mitigate the risks associated with unnecessary duplication resulting from existing overlap.

### Summary of Phase I Study

In December 2012, DOJ convened a working group comprised of representatives from the program offices. The working group helped define the approach for the study and determined that reviewing the 170 solicitations issued in FY 2012 was the best way to identify potential overlap.

The objectives of the Phase I study were to 1) develop a methodology that allowed for comparison of DOJ grant programs based on unique descriptions of each solicitation; 2) use the results of these comparisons to identify the extent to which DOJ's grant programs overlap; and 3) design the study in a manner which would allow for the creation of a replicable process for identifying overlap in future grant programs.

To meet these objectives, common key elements were identified to describe the substance and purpose of the solicitations: subject matter, activity, focus group/target population, and eligible applicants.<sup>5</sup> Working group members from each program office were responsible for examining their 2012 solicitations and assigning descriptors to each key element that best described the content and purpose of the program funding solicitation. The study used a method that compared the unique key element descriptors of each program office solicitation against all other program office solicitations. This resulted in 17,936 unique comparisons between two solicitations. Each comparison was said to have a "high degree of overlap" if three or more of

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<sup>5</sup> As defined in Phase I, *Subject Matter* identifies the topic or issue areas that will be funded by the solicitation. *Activities* identifies the types of tasks to be undertaken as part of the program. *Focus Group/Target Population* identifies who the solicitation is designed to support. *Eligible Applicants* identifies who is eligible to apply for a grant and receive funding under the solicitation.



the key elements shared 50 percent or more of the same descriptors.<sup>6</sup> The study found that less than one-half percent of all comparisons (39 out of 17,936) met this definition. Additionally, there were no solicitation comparisons that matched at a high degree of overall overlap across all four key elements, nor were there any two solicitations with identical matches across all four key elements. These results indicated that, among the hundreds of grant programs DOJ administers each year, the extent of actual overlap within the solicitations for those programs is low.

The table below includes definitions for key concepts from the Phase I study, some of which were used in Phase II.

**TABLE 1**

**Definitions of key concepts: overlap, duplication, and unnecessary duplication**

	Definition	Example
Overlap	Multiple granting agencies or grant programs have similar goals, engage in similar activities or strategies to achieve these goals, or target the same or similar beneficiaries.	Agency A provides funding to law enforcement agencies to proactively investigate human trafficking for purposes of identifying and rescuing victims. Agency B provides funding to victim service organizations to provide services to victims of sex trafficking and labor trafficking. Agency C provides funding for research and evaluation studies on trafficking in persons that can help inform criminal justice agencies addressing human trafficking in their jurisdictions.
Appropriate/ Intended Duplication	A single grantee receiving funding to support the same or similar services/activities from two or more granting agencies or grant programs, which engage in the same or similar activities. Most typically in the form of leveraged resources.	Grantee X is a state agency operating a program to address internet crimes against children. It receives grants funds from Agency A to support its state-wide task force, including training and technical assistance and also receives grant funds from Agency B to support multi-jurisdictional operations to target and identify sex offenders victimizing children. This is an example of leveraging resources, whereby Grantee X uses resources from multiple funding streams in a complementary manner to implement a comprehensive program.
Unnecessary/ Impermissible Duplication	A single grantee received an award of federal funds from more than one federal source and uses those funds for one or more identical cost item.	Grantee X receives two separate awards under Grant Program A and Grant Program B to support enforcement activities. Grantee X charges both grants for the full purchase cost of the exact same police vehicle.

The distinction between overlap and duplication is an important concept and fundamental to how the phases of the study are organized. Overlap occurs when two or more program offices announce program funding solicitations for programs with similar program goals, objectives,

<sup>6</sup> See Appendix B for additional detail on overlap definitions and classifications.



activities, eligible applicants, and/or beneficiaries of the program. As mentioned earlier, overlap is expected in DOJ grant programs and other agency grant programs, given the nature and linkage of the justice system. Additionally, in many instances, grant programs overlap because of the statutes that created them, Congressional appropriations that fund them, or similar mandates that are outside the control of the funding agency. It is important to recognize that overlap itself may not be problematic and, in many cases, is desirable, allowing agencies to design grant programs to be complementary or to leverage multiple funding streams to serve a single justice priority or purpose.

Overlap at the program level creates the potential for duplication at the grant-award level. Duplication may occur when a single grantee receives funds to support similar or same activities from two or more funding streams or agencies. This may be an intended outcome designed to leverage resources when no single funding stream is sufficient to fund a comprehensive program or meet the public safety needs of a jurisdiction. Another form of duplication is referred to as unnecessary or impermissible duplication, which exists when funds are awarded from two or more funding streams or agencies to a single grantee to cover the exact same cost item(s). If this occurs, it represents a misuse of funds, and if it occurs knowingly, may be considered fraud on the grantee's part.

With information on where, and the extent to which, overlap is occurring, agencies are in a better position to minimize overlap and associated risk of duplication in areas not intended, desirable, or permissible; identify and optimize opportunities for coordination; channel resources to target particular justice areas; or, gain efficiencies through the consolidation of programs.

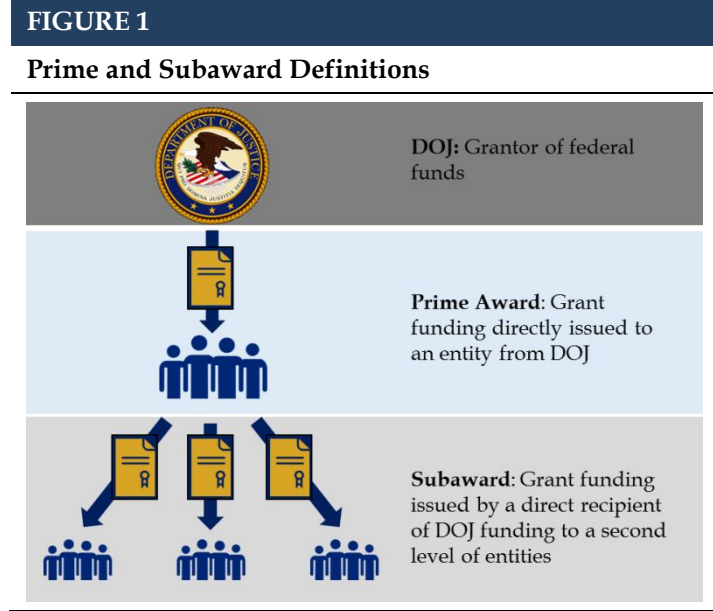




## Phase II of the Study

In September 2013, DOJ began **Phase II** of its study. The two primary objectives of the Phase II study were to:

- Determine if DOJ funded potentially duplicative activities for grantees receiving multiple prime awards and/or subawards in FY 2012. If potential unnecessary duplication was found in the award application, determine if actual unnecessary duplication occurred among the grantee's prime awards and subawards. Figure 1 defines prime awards and subawards.



- Validate the results of Phase I by determining whether unnecessary duplication occurred at the award level within programs where the extent of overlap fell in the medium to high range.

## Approach

To determine if actual unnecessary duplication existed in grantees' FY 2012 awards that were selected as part of the Phase II sample, the following process was applied:

1. Review samples from three populations of FY 2012 award applications to identify potential unnecessary duplication.
2. Follow up with grant managers for instances of potential unnecessary duplication to determine if unnecessary duplication actually occurred.

## Methodology

To conduct this study, OAAM grouped DOJ's FY 2012 awards into three populations and selected a sample of grantees that had multiple FY 2012 prime awards or an FY 2012 prime



award and subaward. The populations and sample sizes are described in Table 2. A detailed description of the sampling approach is available in Appendix C.

<b>TABLE 2</b>		
<b>Sample totals of grantees and awards included in the Phase II study</b>		
	Number of Grantees Sampled	Number of Awards Sampled
FY 2012 Prime Awards: Received more than one prime award in FY 2012	83	374 prime awards
FY 2012 Prime Awards and Subawards: Received at least one prime award and one subaward in FY 2012	81	321 awards (145 prime awards, 176 subawards)
Phase I High/Medium Solicitations sample: <sup>7</sup> Received one award under both solicitations in a given high or medium overlap solicitation combination in FY 2012	55	131 prime awards

To identify potential unnecessary duplication in the FY 2012 award applications, OAAM conducted a file review of award application documents. The documents reviewed included project narratives, budget narratives, detailed budget worksheets (where provided), and Grant Adjustment Notifications (GANs). The information captured from each document and the approach to assessing the awards for duplication is described in Appendix C.

## Results

The findings are presented in three sections that correspond to the three populations that were sampled and reviewed.

### FY 2012 Prime Awards Population

It was determined that no unnecessary duplication occurred in the sample of FY 2012 prime awards that was reviewed.<sup>8</sup> However, although none of the awards were ultimately determined to have unnecessary duplication, seven grantees in this population had award applications that appeared to be duplicative because they listed similar budget items under

<sup>7</sup> This population was chosen to test the validity of the results from Phase I by determining whether unnecessary duplication occurred at the award level within programs where the extent of solicitation overlap fell in the medium to high range. A list of solicitation combinations included in this sample is available in Appendix D.

<sup>8</sup> Within the FY 2012 Prime Awards population, applications for 371 of the 374 awards were determined to be “assessable,” which means that documentation was available to make a determination about whether the awards were duplicative. The three unassessable awards corresponded to only one grantee, so 82 of the 83 grantees were fully assessable.



personnel, travel, or program activities for two or more awards. The sections below discuss the issues found in each of these categories.

*Potential Duplication in Personnel Cost Items*

Three grantees funded the same types of personnel under multiple awards. The award applications for each grantee provided the names of staff members funded under their awards. Therefore, the personnel responsible for carrying out grant activities across awards were easily identified. In each of these situations, the total proposed staff time across all awards for one staff member was over 100 percent in concurrent time periods, which indicated potential duplication. Table 3 provides an example from a grantee that received four awards and listed two of the same staff.



**TABLE 3**  
**Example of Potential Duplication in Personnel Cost Items\***

	Position Title	Start Date	End Date	Percentage Time Proposed
<b>John Smith</b>				
Grant 1	Research Manager	08/22/2012	03/31/2015	45%
Grant 2	Senior Research Associate	08/22/2012	09/30/2013	20%
Grant 3	Research Associate	08/21/2012	09/30/2014	60%
<b>John Smith Total</b>				<b>125%</b>
<b>Mary Jones</b>				
Grant 1	Program Associate	08/22/2012	03/31/2015	90%
Grant 2	Program Assistant	08/21/2012	09/30/2014	25%
<b>Mary Jones Total</b>				<b>115%</b>

\*Note: OJP ensured that none of the grantees we reached out to charged more than 100 percent of staff time for the same staff person.

OAAM contacted grant managers for assistance with obtaining additional information from the grantees regarding the personnel funded. Once notified, grantees were able to provide electronic copies of timesheets with a breakdown of time spent on various projects. After reviewing this documentation, it was determined that the time periods for work under the grants allowed personnel to fulfill all obligations under each individual grant without charging more than 100 percent of their time in any particular day. As a result, no actual unnecessary duplication occurred.

*Potential Duplication in Travel Cost Items*

One grantee listed several of the same positions on each of their three awards. Each award included varying levels of funding for an Executive Director, Associate Director, Finance Director, Attorney, and Program Specialist. In addition, all of the awards included five trips for training. The location of the training was unknown. The question was raised as to whether the positions were held by the same people and who among the staff traveled to the training under each award. During follow-up, the grantee provided a chart of the three grant programs that delineated the training attended by date and staff name. It was determined that no duplicative travel occurred across the three awards, and so no actual unnecessary duplication occurred.

*Potential Duplication in Activities*

One grantee received two awards under the same solicitation. The awards had the same budget categories and proposed similar activities, including online training. No specific information was provided that detailed what was funded under the budget categories. When contacted by the grant manager, the grantee provided detailed project descriptions and budgets for each award. The documents provided by the grantee revealed that one award provided training on ethical decision making for law enforcement and the other provided community policing



training for new officers. While the two training programs shared staff, none of the trainers were budgeted for over 100 percent, and the cost to administer the training was specific to each type of training.

Two other grantees each received two awards that described potentially duplicative activities in the award application, but that did not provide detailed budgets. One grantee had two awards that both mentioned providing funding to subgrantees who provide direct services to victims and/or support for prosecution. This grantee provided additional documentation that indicated that no subgrantees received subawards under both prime awards for the same activities. The other grantee had two awards providing funding to subgrantees who provide direct services to victims. The grantee provided documentation that indicated that one award funded criminal justice initiatives and the other award funded direct victim services. Additionally, only one subgrantee was funded under both awards, but for different projects and services. As a result, it was determined that no unnecessary duplication occurred within the award applications.

### **FY 2012 Prime Awards and Subawards Population**

It was determined that no unnecessary duplication occurred in the sample of FY 2012 prime awards and subawards that was reviewed.<sup>9</sup> However, while none of the awards were ultimately determined to have unnecessary duplication, OAAM contacted the grant managers for 37 grantees during the analysis to provide additional information regarding the following instances of potential unnecessary duplication:

- One grantee had both potentially duplicative personnel cost items and potentially duplicative travel cost items.
- One grantee had potentially duplicative personnel cost items.
- One grantee had potentially duplicative personnel titles included in a prime award budget and a subaward project description.

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<sup>9</sup> As stated on page 7, 81 grantees with 145 prime awards and 176 subawards (321 awards total) were initially included in the sample for this population. During the course of file review and follow-up, some awards were identified to be duplicate records or data entry errors (e.g. a subaward was also reported as a prime award; a subaward was entered twice in FSRS; a subaward had been entered into FSRS but never finalized by the prime grantee; etc.). As a result, the final sample reviewed for this population included 76 grantees with 141 prime awards and 149 subawards (290 total awards). 250 of the 290 awards were determined to be assessable. The 40 unassessable awards were all subawards for which the information in FSRS was insufficiently detailed and the grant manager did not respond during the timeframe of the study, thereby preventing a determination regarding potential duplication. These subawards corresponded to 25 grantees. All awards for the remaining 51 grantees were fully assessable. See Appendix E for a list of the data limitations associated with grantees with unassessable subawards and Appendix F for a list of grantees with at least one unassessable subaward.



- One grantee had potentially duplicative personnel titles included in a prime award budget and a subaward project description, and also had two subawards whose project descriptions mentioned potentially duplicative activities but did not provide detailed budget information.
- Thirty-three grantees had subawards whose project descriptions mentioned potentially duplicative activities but did not provide detailed budget information.

The sections below discuss the issues found among the cost items and activities, as well as the results of follow-up with the grant managers.

#### *Potential Duplication in Personnel Cost Items*

Two grantees included specific staff, identified by name and position title, who were budgeted for over 100 percent of salary costs across multiple awards. Two other grantees included the same position title in the project description of a subaward and the budget of the prime award. For one of these grantees, the prime award appeared to indicate that it would be funding the position 100 percent, and the subaward did not specify the level of support it would fund. For the other grantee, their prime and subawards appeared to indicate that each would be funding 100 percent of the same position. All four of the grantees provided justification that no actual unnecessary duplication occurred.<sup>10</sup>

#### *Potential Duplication in Travel Cost Items*

One of the grantees included what appeared to be identical cost items for travel to the same event in two separate awards. These awards also included many of the same personnel. The grantee was contacted to determine if the same personnel charged expenses for travel to the same event under both of the awards, in excess of 100 percent of the total travel expenses for the event. The grantee provided justification that no actual unnecessary duplication had occurred.

#### *Potential Duplication in Project Description and/or Activities*

Thirty-four grantees reported subawards in FSRS for which the project descriptions and activities were potentially duplicative with one or more of the grantee's other awards, and for which no detailed budget information was provided. These 34 grantees corresponded to 67 subawards. After following up with the grant managers for these grantees, it was determined that 9 of the 34 grantees (27 subawards) did not fund duplicative project activities. The remaining grantees did not respond during the time frame of the study. The 40 assessable

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<sup>10</sup> OJP's Office of the Chief Financial Officer (OCFO) conducted a financial monitoring site visit for one of these grantees during the time the study was being conducted. OCFO reviewed documents related to staff time and travel and provided documentation that no duplication had occurred.



subawards for these grantees represent 12.5 percent of all 321 awards in this population. Given that the majority of subawards (nearly 88%) were reviewed with no duplication, and all prime awards for the grantees in this population were assessable and no duplication was found, OAAM determined that there is a low likelihood of finding duplication in these subawards. (See Appendix E: Data Limitations Associated with Assessable Subawards.)

### **Phase I High/Medium Solicitations Population**

The intent of reviewing Phase I high and medium solicitation combinations was to determine if higher degrees of overall overlap would lead to unnecessary duplication across awards.<sup>11</sup> No evidence of unnecessary duplication was found in grantees' application files; therefore, it was not necessary to contact grantees in this population for additional information.<sup>12</sup> This indicates that, among DOJ's solicitations with higher degrees of overlap, there is a low degree of risk that unnecessary duplication will occur across awards at the application level.

### **Conclusion**

Based on the awards reviewed, no unnecessary duplication occurred among the sample of grant applications from DOJ's FY 2012 prime awards and subawards. However, although none of the awards we reviewed were ultimately determined to have unnecessary duplication, OAAM initially found that 44 grantees had items in their applications that appeared to be potentially duplicative in the areas of personnel, travel, and project activities. OAAM contacted the grant managers for these grantees to provide additional detail, and after further analysis, no actual unnecessary duplication was found.

Both phases of DOJ's Study provide the OJP, OVW, and the COPS Office with the ability to better understand the current extent of programmatic overlap and to determine where the potential exists for unnecessary duplication to occur among grant awards. The results of this study indicate that DOJ's current solicitation creation, award-making, and coordination processes are working in a manner that minimizes the potential for unnecessary duplication. As a result of both phases of this study, OJP is developing a formal process to continuously monitor and assess the degree of overlap among its programs. This process will be used in

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<sup>11</sup> A solicitation combination occurs when one solicitation is paired with another for purposes of comparing content.

<sup>12</sup> While 55 grantees were sampled initially, one grantee was removed from the sample because it was determined that it did not have a solicitation combination with a high or medium degree of overlap, and two grantees were combined after their names were reconciled. Additionally, one grantee was present in both the high and medium samples. As a result, 52 unique grantees were analyzed for potential duplication, corresponding to 128 total awards. All 128 awards were assessable.



future years as an additional mechanism to reduce potential grant fraud and to assist DOJ with planning grant programs and coordinating activities.





## Appendix A: Examples of Leveraging Resources

There were several grantees in the sample populations that effectively leveraged available federal resources in order to meet their program needs. More specifically, these grantees had awards with similar subject areas and activities, but each award had budget costs items that enhanced or complemented one other. The following examples describe how award recipients leveraged DOJ grant resources to achieve their goals:

- **Alachua County, FL** received JAG awards as a prime grantee and as a subaward through the state. Both awards were used to combat gangs, and each partially funded a gang investigator to assist with suppressing gang activity and to provide training to other gang investigators.
- **The City of Atlanta** received awards under the COPS hiring and JAG Programs to support their law enforcement efforts. The JAG award funded overtime for officers, and 15 new officers were to be hired with the COPS hiring funds.
- **The Louisiana Foundation against Sexual Assault** received two awards under the following OVW solicitations: Grants to State Sexual Assault and Domestic Violence Coalitions Program, and Engaging Men in Preventing Sexual Assault, Domestic Violence, Dating Violence, and Stalking Grant Program. The first award supported state coalition efforts to coordinate victim services and to facilitate collaboration among other agencies when responding to domestic situations. The second award engaged men and boys to help prevent sexual assaults and other crimes related to violence against women.
- **The Menominee Indian Tribe of Wisconsin** received five awards under the Consolidated Tribal Assistance Solicitation. Three of the five awards primarily sought to fund programs that addressed violence against women and focused on topics such as sexual assault, domestic violence, and training for victim service providers. The other two awards were for officer training in community policing and offender substance abuse. None of the costs incurred were duplicative.
- **The Native American Rights Fund, Inc.** received two awards under the same solicitation entitled Tribal Civil and Criminal Legal Assistance Grants, Training, and Technical Assistance. These awards partially funded the same grant staff. None of the staff were funded over 100 percent on any of the awards. However, one award focused on criminal legal assistance to victims and the other on civil matters.



## Appendix B: Overlap Designation Definitions

In the DOJ Study to Determine the Extent of Overlap among its Grant Programs, an automated process was created to carry out the comparisons of the four key elements for all FY 2012 solicitations across each program office. The pairing of solicitations for the purposes of comparing content was referred to as a *solicitation combination*. The number of matches in each key element for each solicitation combination was calculated and converted into a percentage. To facilitate an understanding of the comparison results, *total match percentages* were generated to show the degree of potential overlap for a key element. For the purpose of the study, the higher the total match percentage for a key element, the higher the degree of potential overlap.

To make determinations on which solicitation combinations may require further examination, a conservative threshold, or baseline, was developed using the key element total match percentages. The degree of overall overlap between a solicitation combinations was determined by the number of key elements with a total match percentage of 50 percent or more. The higher the number of key elements with total match percentages of 50 percent or more, the greater the degree of overlap. For the purpose of this study, the following threshold levels were used: high, medium, and low. Table B-1 provides a description for each threshold.

**TABLE B-1**

**Thresholds established to determine the degree overall overlap**

High	A solicitation combination that has a total match percentage of 50 percent or more across three or more key elements was considered the highest degree of overlap.
Medium	A solicitation combination that has a total match percentage of 50 percent or more across two or more key elements was considered a medium degree of overlap.
Low	A solicitation combination that has a total match percentage of 50 percent or more within only one key element was considered a low degree of overlap.
Limited Overlap to No Overlap	A solicitation combination that did not meet any of the above thresholds and has a total match percentage of less than 50 percent within all key elements was considered limited degree of overlap to no overlap.

Table B-2 shows examples of how the degree of overall overlap was determined by the number of key elements that had a total match percentage of 50 percent or more. The check marks in the example illustrate the key elements that had a total match percentage of 50 percent or more. The extent of overlap increases with the number of key elements that meet the 50 percent match threshold.



**TABLE B-2**

**Example of solicitation comparisons with the degree of overall overlap based on total match percentages of 50 percent or higher across multiple key elements**

		Subject Matter	Activities	Focus Group/ Target Population	Eligible Applicants	Degree of Overall Overlap
Solicitation 1	Solicitation 2	✓	✓	✓	✓	High
Solicitation 2	Solicitation 3	✓	✓	✓		High
Solicitation 3	Solicitation 4	✓	✓			Medium
Solicitation 4	Solicitation 5	✓				Low
Solicitation 5	Solicitation 6					Limited Overlap to No Overlap



## Appendix C: Methodology

The scope of Phase II included all grantees who received more than one prime award or at least one prime award and one subaward in FY 2012. Because grantees often receive multiple awards to achieve a common goal, this population is the place where unnecessary duplication would likely occur among DOJ awards. These grantees were grouped into three populations from which samples were selected for review:

- FY 2012 Prime Awards Population: Grantees who received more than one prime award from the program offices.
- FY 2012 Prime and Subawards Population: Grantees who received at least one prime award and one subaward from the program offices.
- Phase I High/Medium Solicitations Population: Grantees who had awards across a solicitation combination in the high or medium range from the Phase I analysis.<sup>13</sup> This population was chosen to test the validity of the results from Phase I by determining whether unnecessary duplication occurred at the award level within programs where the extent of overlap fell in the medium to high range.

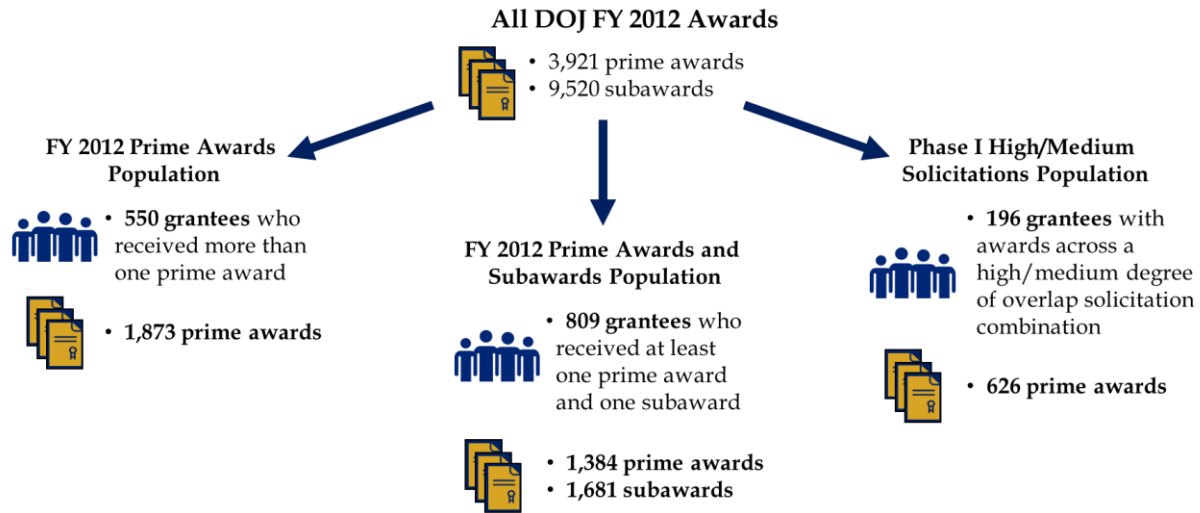
Figure C-1 summarizes the number of grantees and awards that were included in each population, relative to the total number of awards made in FY 2012.

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<sup>13</sup> In Phase I, each solicitation was compared against all other solicitations from other program offices. For example, the data inputted for BJA solicitation #1 was compared against the data in the 170 solicitations from other program offices. As a result, BJA solicitation #1 was part of 170 *solicitation combinations*.



**FIGURE C-1**  
**Population Summary**



To conduct the analysis, samples were taken from the FY 2012 Prime Awards population and the FY 2012 Prime Awards and Subawards population. For the Phase I High/Medium Solicitations population, OAAM decided to review the entire population of awards made under solicitations with a high degree of overlap, and to take a sample of the awards made under solicitations with a medium degree of overlap. The sampling approaches for each population are described below.

### FY 2012 Prime Awards Population Sample Selection

The FY 2012 Prime Awards population was defined by generating a list from the Grants Management System (GMS) of all FY 2012 OJP and OVW prime awards, and a list of all FY 2012 COPS prime awards from the COPS Management System (CMS). The grantees were then reviewed to determine which had received more than one prime award in FY 2012. The list of grantees with more than one FY 2012 prime award was then divided into eight sub-populations by solicitation, which included the following:

- Community Oriented Policing Services (COPS) Hiring
- Regional Information Sharing Systems (RISS)
- BJA Solicited
- Juvenile Accountability Block Grants (JABG)
- Title II Formula Grants Program
- Justice Assistance Grants (JAG) - Local



- Justice Assistance Grants (JAG) - State
- All other solicitations

The first seven solicitations above were selected because of their broad nature, which could have potentially resulted in an inaccurate determination of overlap in the Phase I study analysis, or were specifically chosen by the program office representatives for closer examination.

Grantees were placed into one of the eight sub-populations under which they received at least one award. Once a grantee was assigned to a sub-population, all of the grantee’s awards were reviewed if the grantee was selected as part of the sample for file review. For example, if Grantee X had five awards and one was under a COPS Hiring solicitation, the grantee was included in the COPS Hiring sub-population but excluded from the other seven solicitation sub-populations.

For the above sub-populations, the following sampling convention was used:

- If a sub-population contained fewer than 10 grantees, all grantees were reviewed.
- If a sub-population contained 10 or more grantees but fewer than 100 grantees, 10 grantees were reviewed.
- If a sub-population contained 100 or more grantees, 10 percent of the grantees were reviewed.

For example, 28 grantees in the FY 2012 Prime Awards population had at least one award under the COPS Hiring solicitation, and so were included in the COPS Hiring sub-population.

Following the sampling convention above, 10 of these grantees were randomly sampled for review. These grantees had a total of prime 31 awards. The results of this sampling approach are summarized in Table C-1.

**TABLE C-1**  
**FY 2012 Prime Awards Sub-Population**  
**Sample Sizes**

	Number of Grantees	Number of Prime Awards
COPS Hiring	10	31
RISS	3	21
BJA Solicited	10	88
JABG	10	52
Title II	1	3
JAG - Local	10	29
JAG - State	10	62
All Other	29	88
<b>Total</b>	<b>83</b>	<b>374</b>



## FY 2012 Prime Awards and Subawards Sample Selection

The FY 2012 Prime Awards and Subawards population was defined by pulling all FY 2012 subawards that were made to entities that received a prime award from a DOJ program office. The data was pulled from USAspending.gov, which reports subawardee data submitted by prime awardees in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS).<sup>14</sup> The entities who received subawards were compared to the grantees who received prime awards to determine which grantees received at least one prime award and one subaward in FY 2012 from the program offices. Once the population of grantees was defined, a random sample of 10 percent of the 809 grantees in the FY 2012 Prime awards and Subawards population was taken. The results of the sampling approach are summarized in Table C-2.

**TABLE C-2**

<b>FY 2012 Prime and Subawards Population Sample - 81 Grantees</b>	
Prime Awards	145
Subawards	176
<b>Total Awards</b>	<b>321</b>

## Phase I High/Medium Solicitations Sample Selection

The Phase I High/Medium Solicitations population was defined by reviewing the high and medium degree of overall overlap solicitation combinations as defined in Phase I, and then determining which grantees had received an award under both solicitations in a given solicitation combination.<sup>15</sup> For example, if a solicitation combination was made up of a BJS solicitation and SMART solicitation, Grantee X must have received one award under each solicitation to be included in the population for the sample selection.

Among the 39 solicitation combinations with a high degree of overall overlap, there were 6 solicitation combinations that had grantees with awards for each solicitation, for a total of 39 grantees. All 39 grantees and the corresponding awards from solicitation combinations with a high degree of overall overlap were included in this sample. Among the 484 solicitation combinations with a medium degree of overall overlap, there were 116 solicitation combinations that had grantees with awards for each solicitation, for a total of 157 grantees. A 10 percent random sample of grantees was taken from the solicitations determined to have a medium degree of overlap, which resulted in a sample of 16 grantees. As shown in Table C-3, a total of 55 grantees and 131 awards were selected for the Phase I High/Medium Solicitations

<sup>14</sup> FSRS is the reporting tool Federal prime awardees (i.e. prime contract and prime grants recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet the FFATA reporting requirements. Prime contract awardees report against sub contracts awarded and prime grant awardees report against sub grants awarded.

<sup>15</sup> See Appendix D for a list of the high and medium degree of overall overlap solicitation combinations, as defined in Phase I.



sample. See Appendix D to view the solicitation combinations that were included in this sample.

**TABLE C-3**

**Number of solicitation combinations, grantees, and awards selected for the Phase I High/Medium Solicitations sample by the Phase I study's degree of overall overlap**

	Solicitation Combinations	Grantees*	Awards
High Degree of Overlap	6	39	86
Medium Degree of Overlap	19	16	45
<b>Total</b>	<b>25</b>	<b>55</b>	<b>131</b>

\*These are the number of unique grantees due to six grantees appearing in more than one solicitation combination.

### Final Sample Profile

The final sample of grantees reviewed for each population is listed in Table C-4.

**TABLE C-4**

**Sample totals of grantees and awards included in the Phase II study**

	Number of Grantees	Number of Awards
FY 2012 Prime Awards: Received more than one prime award in FY 2012	83	374 prime awards
FY 2012 Prime Awards and Subawards: Received at least one prime award and one subaward in FY 2012	81	321 awards (145 prime awards, 176 subawards)
Phase I High/Medium Solicitations sample: <sup>16</sup> Received one award under both solicitations in a given high- or medium-overlap solicitation combination in FY 2012	55	131 prime awards

### Review of the FY 2012 Award Applications

To identify potential unnecessary duplication in the FY 2012 award applications, a file review of award application documents was conducted. The documents reviewed included project narratives, budget narratives, detailed budget worksheets (where provided), and GANs. The information captured from each data source is described in Figure C-2.

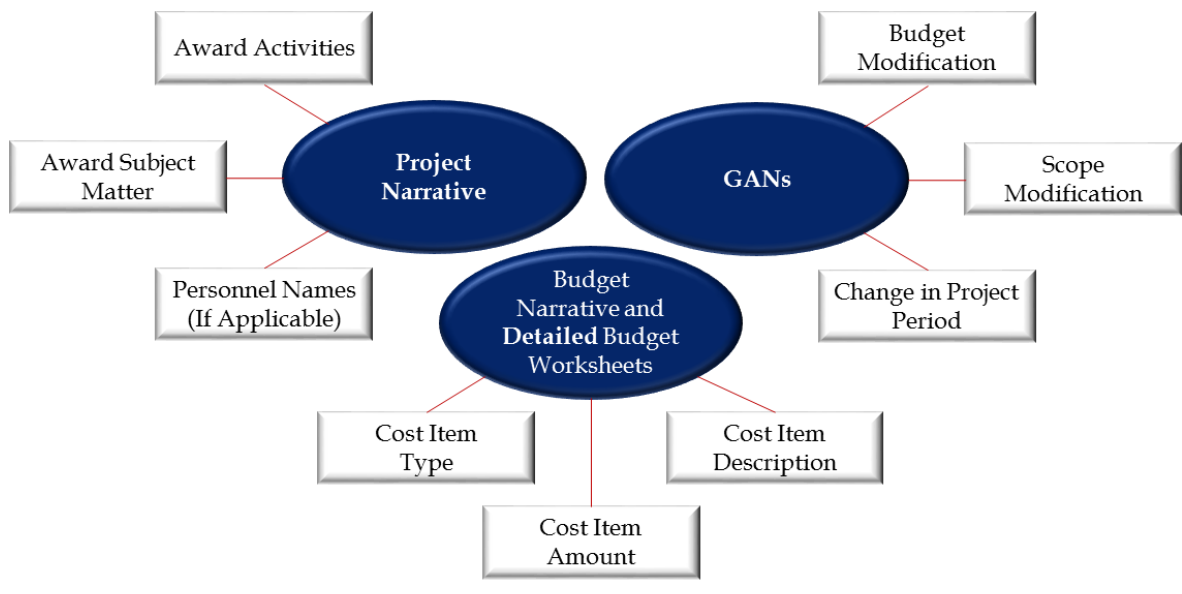
<sup>16</sup> This population was chosen to test the validity of the results from Phase I by determining whether unnecessary duplication occurred at the award level within programs where the extent of overlap fell in the medium to high range. A list of solicitation combinations included in this population is available in Appendix D.





**FIGURE C-2**

**Information collected during the grant application file review by data source**



When capturing the data, varying levels of detail in the application documents across awards were encountered. The approaches to assessing the three levels of detail found in the application documents are described below.

For award applications that provided detailed cost item-level budget information, all cost items were compared across all of a grantee’s awards to determine if they were potentially duplicative. Cost items were compared across awards by reviewing key data elements for each cost item. These data elements included the cost type, detailed cost description, and other cost type-specific information (e.g., name, title, and percent of time for personnel costs; event name for travel costs).<sup>17</sup>

For award applications that did not include detailed cost item-level budgets in their applications, but instead provided descriptions of cost categories (travel, personnel, etc.) or specific activities (victim advocacy, law enforcement training, etc.), the grantee’s awards were compared to determine if the specific cost categories or activities were duplicative. For example, if one of a grantee’s awards was specifically for the Equipment cost category and the

<sup>17</sup> Cost types were determined based on the section of the award application budget a cost item was listed under. The budget sections were Consultants/Contractors, Contracts, Equipment, Grantee-Added, Other, Personnel, Supplies, and Travel.



other was only for Personnel, it was determined that DOJ did not fund potentially duplicative activities under those awards even though detailed cost item-level budgets were not provided.

For award applications that did not provide information regarding specific cost categories or activities, the solicitation under which the award was made was reviewed to determine if awards made under the different solicitations would be allowed to fund similar activities and/or serve the same target beneficiaries/populations. For example, the FY 12 VOCA Victim Assistance Formula solicitation (VOCA Assistance) funded programs that provided direct assistance to victims of crime, while the FY 12 Paul Coverdell Forensic Science Improvement Grants Program (Coverdell) awarded funds to “help improve the quality and timeliness of forensic science and medical examiner services.” The VOCA Assistance solicitation language states that:

Services generally include those efforts that (1) respond to the emotional and physical needs of crime victims; (2) help primary and secondary victims of crime to stabilize their lives after a victimization; (3) help victims to understand and participate in the criminal justice system; and (4) provide victims of crime with a measure of safety and security, such as boarding up broken windows and replacing and repairing locks.<sup>18</sup>

The Coverdell solicitation language states that:

A State or unit of local government that receives a Coverdell grant must use the grant for one or more of these three purposes:

1. To carry out all or a substantial part of a program intended to improve the quality and timeliness of forensic science or medical examiner services in the State, including those services provided by laboratories operated by the State and those operated by units of local government within the State.
2. To eliminate a backlog in the analysis of forensic science evidence, including, among other things, a backlog with respect to firearms examination, latent prints, toxicology, controlled substances, forensic pathology, questioned documents, and trace evidence.
3. To train, assist, and employ forensic laboratory personnel as needed to eliminate such a backlog.<sup>19</sup>

Because the activities allowable under VOCA Assistance focus on helping victims directly, and the activities funded under Coverdell focus on improving forensic and/or medical examiner

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<sup>18</sup> US Department of Justice: *OVC FY 2014 VOCA Victim Assistance Formula*, June 2014

<sup>19</sup> US Department of Justice: *Paul Coverdell Forensic Science Improvement Grants Program*, March 2012



services, awards made under these solicitations should not fund duplicative activities or serve the same target populations.

If a cost item appeared to be duplicative in two or more of a grantee's awards, or a review of the cost categories, activities, and solicitation language could not rule out potential unnecessary duplication, the respective program office grant manager was contacted for additional information. The grant managers reached out to the grantee for additional documentation. After receiving the documentation from the grantee, a final determination regarding whether unnecessary duplication had occurred across the grantee's awards was made. In cases where no response was received from the grant manager during the time frame of the study, the award was determined to be "unassessable." Appendix E summarizes the data limitations associated with grantees with assessable awards. Appendix F lists grantees with at least one assessable award.



## Appendix D: High and Medium Solicitation Combinations

TABLE D-1		
Solicitation combinations included in the Phase I High/Medium Solicitations sample		
		Degree of Overall Overlap
BJS FY 12 National Criminal History Improvement Program	NIJ FY 12 Solving Cold Cases with DNA	High
NIJ FY 12 Evaluation of the Implementation of the Sex Offender Treatment Intervention and Progress Scale (SOTIPS)	OJJDP FY 12 Mentoring Best Practices Research	High
NIJ FY 12 Paul Coverdell Forensic Science Improvement Grants Program	OVW FY 12 Sexual Assault Services Formula Grant Program	High
OVC FY 12 VOCA Victim Compensation Formula	BJA FY 12 John R. Justice	High
OVC FY 12 CTAS Purpose Area 8: Comprehensive Tribal Victim Assistance Program	OVW FY 12 CTAS Purpose Area 5: Tribal Sexual Assault Services Program	High
COPS Hiring FY 12	NIJ FY 12 Solving Cold Cases with DNA	High
BJS FY 12 National Criminal History Improvement Program	SMART FY 12 Support for Adam Walsh Act Implementation Grant Program	Medium
NIJ FY 12 Applied Research and Development in Forensic Science for Criminal Justice Purposes	OJJDP FY 12 Community-Based Violence Prevention FIRE Program	Medium
NIJ FY 12 Applied Research and Development in Forensic Science for Criminal Justice Purposes	OJJDP FY 12 EUDL Field-Initiated Research and Evaluation Program	Medium
NIJ FY 12 Applied Research and Development in Forensic Science for Criminal Justice Purposes	OJJDP FY 12 National Forum on Youth Violence Prevention TTA Project	Medium
NIJ FY 12 Applied Research and Development in Forensic Science for Criminal Justice Purposes	OJJDP FY 12 Mentoring Best Practices Research	Medium
NIJ FY 12 Applied Research and Development in Forensic Science for Criminal Justice Purposes	OVC FY 12 Identifying Culturally Responsive Victim-Centered Restorative Justice Strategies	Medium
NIJ FY 12 Applied Research and Development in Forensic Science for Criminal Justice Purposes	BJA FY 12 Visiting Fellows Program	Medium
NIJ FY 12 Applied Research and Development in Forensic Science for Criminal Justice Purposes	BJA FY 12 National Justice Information Sharing (JIS) Initiative	Medium
NIJ FY 12 DNA Backlog Reduction Program	OVC FY 12 VOCA Victim Assistance Formula	Medium
NIJ FY 12 DNA Backlog Reduction Program	OVW FY 12 Safe Havens: Supervised Visitation and Safe Exchange Grant Program	Medium



**TABLE D-1**

**Solicitation combinations included in the Phase I High/Medium Solicitations sample**

		Degree of Overall Overlap
NIJ FY 12 DNA Backlog Reduction Program	BJA FY 12 Harold Rogers Prescription Drug Monitoring Program	Medium
OJJDP FY 12 Title II Formula Grants Program	BJA FY 12 Edward Byrne Memorial Justice Assistance Grant (JAG) Program State Solicitation	Medium
OJJDP FY 12 Juvenile Accountability Block Grant	BJA FY 12 Edward Byrne Memorial Justice Assistance Grant (JAG) Program State Solicitation	Medium
OVC FY 12 VOCA Victim Assistance Formula	BJA FY 12 Residential Substance Abuse Treatment (RSAT)for State Prisoners Program	Medium
OVC FY 12 VOCA Victim Assistance Formula	BJA FY 12 John R. Justice	Medium
OVC FY 12 VOCA Victim Assistance Formula	OVW FY 12 Sexual Assault Services Formula Grant Program	Medium
OVC FY 12 CTAS Purpose Area 7: Children's Justice Act Partnerships for Indian Communities Program	OVW FY 12 CTAS Purpose Area 6: Violence Against Women Tribal Governments Program	Medium
BJA FY 12 Edward Byrne Memorial Justice Assistance Grant (JAG) Program State Solicitation	OVW FY 12 STOP Violence Against Women Formula Grant Program	Medium
BJA FY 12 Edward Byrne Memorial Justice Assistance Grant (JAG) Program	OVW FY 12 Grants to Encourage Arrest Policies and Enforcement of Protection Orders Program	Medium



## Appendix E: Data Limitations Associated with Unassessable Subawards

During the course of the study, a review of the cost categories, activities, and solicitation language could not rule out potential unnecessary duplication for 67 subawards (corresponding to 34 grantees) in the FY 2012 Prime and Subaward population sample. The grantees were contacted by their grant managers and asked to provide documentation related to their grant activities. After following up with grantees, 40 subawards remained unassessable. The results of the follow-up are summarized in Table E-1. In cases where no response was received from the grant manager regarding the subaward during the time frame of the study, the subaward was determined to be “unassessable.”

**TABLE E-1**

	Number of Grantees	Number of Prime Awards	Number of Subawards	Total Awards
<b>Total Sample - Initial Results</b>				
Assessable Before Follow-up	42	141	82	223
Unassessable Before Follow-up	34	0	67	67
<b>Total Sample Analyzed</b>	<b>76</b>	<b>141</b>	<b>149</b>	<b>290</b>
<b>Follow-up Results</b>				
Assessable After Follow-up	9	0	27	27
Unassessable After Follow-up	25	0	40	40
<b>Total Followed-up</b>	<b>34</b>	<b>0</b>	<b>67</b>	<b>67</b>
<b>Total Sample - Final Results</b>				
Assessable	51	141	109	250
Unassessable	25	0	40	40
<b>Total</b>	<b>76</b>	<b>141</b>	<b>149</b>	<b>290</b>

As shown in Table E-1, 33 percent of the grantees in the sample had at least one unassessable subaward even after follow-up was conducted with the grant manager. However, this represents only 14 percent of the total number of awards in the sample, indicating that 86 percent of the awards in the sample were assessable. No potential unnecessary duplication was found among the assessable awards.



## Appendix F: Grantees with Unassessable Subawards

The following table lists the grantees with unassessable subawards. For comparison, the table also lists the number of assessable subawards each grantee had.

<b>TABLE F-1</b>			
<b>Grantees with Unassessable Subawards</b>			
<b>Grantee Name</b>	<b>Unassessable Subawards</b>	<b>Assessable Subawards</b>	<b>Total</b>
Alachua County	2	2	4
Augusta City/Richmond County	2	0	2
Bexar County	1	1	2
Caring Unlimited Corporation	1	0	1
City of DeLand	2	0	2
City of North Charleston	3	1	4
Florida Department of Health	2	0	2
Iowa Coalition Against Sexual Assault	2	0	2
Levy County	2	0	2
Louisiana Foundation Against Sexual Assault	1	0	1
Maine Coalition Against Sexual Assault	2	0	2
Miami-Dade County	1	0	1
Mississippi State Coalition Against Domestic Violence	1	0	1
National Children’s Advocacy Center, Inc.	1	0	1
Osceola County	1	7	8
Oswego County Opportunities, Incorporated	2	0	2
Pennsylvania State University	1	2	3
Prairie State Legal Services, Incorporated	1	0	1
Prince William County	2	0	2
Sarpy County	2	0	2
State Appellate Defender Office	1	0	1
University of New Mexico Contracts and Grants Accounting	1	3	4
Walton County	2	1	3
Wisconsin Coalition Against Sexual Assault	3	0	3
YWCA Central Alabama	1	0	1
<b>Total</b>	<b>40</b>	<b>17</b>	<b>57</b>