



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

FY 2008 OJP and COPS Office Programmatic and Financial Monitoring

Program Assessment Report No. 09-01

September 2009

About This Report

The Office of Justice Programs, Office of Audit, Assessment, and Management (OAAM), Program Assessment Division prepared this report. For questions about this report, please contact Ms. Maureen Henneberg, Director of OAAM, at (202) 514-9178.

Acronyms

CMS	COPS Management System
GAT	Grant Assessment Tool
GMM	Grant Manager's Manual
GMS	Grant Management System
GMT	Grant Monitoring Tool
OAAM	Office of Audit, Assessment, and Management
COPS Office	Office of Community Oriented Policing Services
OCFO	Office of the Chief Financial Officer
OJP	Office of Justice Programs



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Office of Audit, Assessment, and Management

The Office of Audit, Assessment, and Management (OAAM) was established by Public Law 109-162 in January 2006. OAAM's primary responsibilities are to:

- ensure financial grant compliance and auditing of Office of Justice Programs (OJP) internal controls to prevent fraud, waste, and abuse;
- conduct program assessments of OJP and Office of Community Oriented Policing Services grant programs;
- oversee monitoring activities; and
- serve as a central source for grant management policy.

Program Assessment

OAAM's Program Assessment Division researched and wrote this report. OAAM 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

FY 2008 OJP and COPS Office Programmatic and Financial Monitoring

The Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS Office) in the U.S. Department of Justice administer grants to states and local communities to increase public safety, improve the fair administration of justice across America, and advance the practice of community policing. As a critical component of grant administration, grant monitoring is intended to ensure the fiscal and programmatic integrity and accountability of grantees.¹ To this end, OJP and the COPS Office are responsible for conducting annual desk reviews of grant awards, interacting with grantees to provide technical assistance as needed, and conducting periodic on-site monitoring visits.

Since FY 2007, OAAM has provided oversight of OJP and COPS Office monitoring activities. OAAM tracks progress throughout the fiscal year to ensure that offices programmatically monitor at least 10 percent of their open and active award funds as required by Public Law 109-162, "Violence Against Women and Department of Justice Reauthorization Act of 2005." Additionally, OAAM reviews policies and procedures to ensure a consistent level and quality of monitoring across OJP and the COPS Office, and identifies and implements improvements, as necessary.

In FY 2008, our first annual monitoring report, Assessment Report 2008-01, "FY 2007 Programmatic Monitoring Report," summarized the monitoring activities of OJP and the COPS Office. That report also described improvements to monitoring policies and procedures, and contained recommendations for further improvements for OAAM to achieve in FY 2008.

This year's annual report, "FY 2008 OJP and COPS Office Programmatic and Financial Monitoring," describes our progress with implementing the recommendations from the FY 2007

¹ Grant Manager's Manual (April 2008).

report. It provides an analysis of OJP and COPS Office monitoring trends from FY 2008 and outlines plans to further improve OJP and COPS Office monitoring policies and procedures in FY 2009.

Improved Monitoring Policies and Procedures

The “FY 2007 Programmatic Monitoring Report” provided a series of recommendations to improve grant monitoring tools, policies, and procedures. The following table summarizes the FY 2007 recommendations and the policy, process, or tool implemented in FY 2008 in response to each recommendation.

FY 2007 Recommendations and FY 2008 Improvements

#	FY 2007 Recommendation	FY 2008 Improvement
1	Continue to meet or exceed established monitoring targets.	Continued OAAM quarterly tracking and reporting
2	Develop site visit report standards and offer training to grant managers.	Developed the Grant Monitoring Tool
3	Develop standardized monitoring procedures to be used across all OJP offices.	Developed the Grant Monitoring Tool
4	Develop a standardized site visit report planning process and provide training.	Developed the Grant Assessment Tool
5	Modify the Grant Management System (GMS) to support date stamp on site visit report uploads.	Completed a functional requirements document for adaptive maintenance to GMS monitoring module
6	Encourage follow-up on site visit findings through execution of corrective action plans.	Completed a functional requirements document for adaptive maintenance to GMS monitoring module

In response to Recommendation 1, in FY 2008, we continued to track the number of grants monitored and to provide information on monitoring progress to OJP and COPS Office leadership. Each quarter we provided OJP and the COPS Office with a scorecard highlighting monitoring progress against the 10-percent target and goals for each office, as well as information on the quality of site visit documentation and Grant Monitoring Tool (GMT) usage. These efforts will continue in FY 2009.

In response to Recommendations 2 and 3, we developed the GMT to ensure uniform site visit monitoring procedures and to ensure consistent quality in the content of reports for FY 2008 at OJP.² The GMT contains templates and a checklist that outline programmatic, administrative, and financial elements that should be reviewed on every site visit to ensure a comprehensive and thorough review of grantee performance and compliance.

In response to Recommendation 4, we developed the Grant Assessment Tool (GAT) to ensure a uniform site visit planning process. The Microsoft Excel-based GAT provided criteria grant managers used to assess their grants and determine which grants would benefit most from on-site monitoring. Based on user feedback about the FY 2008 GAT, we will implement further improvements to the GAT for FY 2009 to streamline the process, provide more meaningful results, and assist in priority-based monitoring planning.

In response to Recommendations 5 and 6, and to improve on the GMT requirements, we completed a functional requirements document to support the adaptive maintenance to OJP's GMS monitoring module. The module will provide monitoring workflow, date stamp activities performed in the system, improve compliance with monitoring documentation requirements and deadlines, enhance the grant manager's ability to track findings, and encourage follow-up with grantees through the execution of corrective action plans. The functional requirements document was approved in September 2008, and we will work with the Office of the Chief Information Officer to roll out the updated GMS monitoring module in FY 2009.

FY 2008 OJP and COPS Office Monitoring Statistics

In FY 2008, we tracked the number of grants and amount of grant funds monitored by OJP and the COPS Office, assessed OJP compliance with using required elements in the GMT, tracked the use of nonrequired GMT elements, reviewed a sample of completed site visit reports, and looked at OJP use of the GMT for the sample to determine whether it affected the site visit documentation.

Target, Planned, and Completed Monitoring

Public Law 109-162, "Violence Against Women and Department of Justice Reauthorization Act of 2005," requires OJP and the COPS Office to monitor at

² In FY 2007, we reviewed the COPS Management System (CMS) and determined that the system incorporated GMT requirements. Therefore, the COPS Office is not required to use the GMT and instead posts their site visit reports in CMS.

least 10 percent of their total open and active award funding each year. We refer to this 10-percent requirement as the **target monitoring**. The total open and active award funding amount for FY 2008 for OJP and the COPS Office was \$8,745,947,388.³ Therefore, the total programmatic target monitoring for FY 2008 was \$874,594,739.

To ensure they meet or exceed the target monitoring, the program offices create an annual programmatic monitoring plan at the beginning of the fiscal year. We refer to the amount in the plan as **planned monitoring**. In FY 2008, the original monitoring plan submitted by the program offices stated that the program offices planned to monitor 1,501 grants totaling \$3.13 billion in award funding. That is, they planned to monitor about \$2.25 billion more than the law requires them to monitor.

In FY 2008, OJP and the COPS Office monitored 1,311 grants representing \$2.65 billion in open awards. We refer to this amount as **completed monitoring**. Although completed monitoring represents only 84 percent of originally planned monitoring, program offices exceeded the required target monitoring by \$1.77 billion, or 203 percent. In addition to programmatic monitoring, the Office of the Chief Financial Officer conducted financial monitoring for grants with an award value totaling \$791.3 million.

OJP Use of the Grant Monitoring Tool

In addition to tracking the award funding amount of grants monitored at OJP and the COPS Office, we assessed OJP program office compliance with GMT usage. Since October 2007, OJP program offices have been required to use two elements of the GMT for on-site monitoring visits: the site visit checklist and site visit report. OJP conducted programmatic monitoring for 1,236 grants in FY 2008. Overall, 919 (74.35 percent) of reports uploaded into GMS were completed using both required GMT elements. Use of nonrequired elements varied across program offices. Use ranged from 31 to 100 percent for the GMT desk review checklist, and from 28 to 92 percent for GMT letters/templates.

Site Visit Documentation Review

For a sample of 151 OJP and COPS Office site visit reports, we determined whether the reports contained evidence of the grant manager's review of grantee

³ This value is the total value of open active awards for all of OJP and the COPS Office with the exception of the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART Office). In FY 2008, the SMART Office was in the process of making its first awards. These awards will be scheduled for monitoring in FY 2009; thus, the SMART Office is not covered in this report.

compliance and an analysis of grantee performance. Of the sampled reports, 68 percent contained strong evidence of a compliance review. More than half (58 percent) of the OJP and COPS Office reports in the sample had strong evidence that the grant manager conducted meaningful analysis. For the 141 OPJ reports in the sample, we also evaluated whether use of the GMT affected the site visit documentation. The data suggest a slight correlation between using the GMT and having better site visit documentation. However, because only 6 out of 141 OJP reports in the sample were completed *without* use of the GMT, and because elements of the documentation review were qualitative rather than quantitative, we cannot definitely conclude that use of the GMT led to more thorough reviews of grantee compliance.

FY 2009 Planned Activities

Throughout FY 2008, we found opportunities to further improve monitoring activities. In FY 2009, we plan to accomplish the following activities to further improve monitoring activities and assist OJP and the COPS Office in fulfilling their responsibility to ensure the fiscal and programmatic integrity and accountability of their grantees.

1. Release the updated, Microsoft Access-based version of the GAT with weighted criteria and improved response options. Incorporate quarterly monitoring update capabilities into the GAT.
2. Propose modifications to the desk review policy for OJP offices.
3. Review FY 2009 GAT usage. Evaluate and report on trends to determine whether the GAT results in priority-based monitoring plans as intended.
4. Support the development of the GMS monitoring module. Release the module and develop a training curriculum that incorporates monitoring policy and process changes resulting from the new module.
5. Conduct an assessment of OJP and COPS Office post-site visit activities to determine grant manager compliance with post-site visit follow-up activities.
6. Conduct a review of financial monitoring activities performed by the Office of the Chief Financial Officer to determine whether adequate financial controls are in place to safeguard OJP funds, ensure compliance with federal laws and regulations, and assist grantees in administering their grants.

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7. Improve oversight methods for site visit monitoring. For example, develop methods to validate the accuracy of grant monitoring documentation and objectively review the quality of site visit reports.

OJP and COPS Office Response

We provided a draft of this report to OJP and the COPS Office. No written response was required and none was received. Therefore, we are publishing this report in final form.



Introduction

The Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS Office) in the U.S. Department of Justice administer grants to states and local communities to increase public safety, improve the fair administration of justice across America, and advance the practice of community policing. As a critical component of grant administration, grant monitoring is intended to ensure the fiscal and programmatic integrity and accountability of grantees.¹ To this end, OJP and the COPS Office are responsible for conducting annual desk reviews of grant awards, interacting with grantees to provide technical assistance as needed, and conducting periodic on-site monitoring visits.²

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 policy and oversight. Since FY 2007, OAAM has provided oversight of OJP and COPS Office monitoring activities. OAAM tracks progress throughout the fiscal year to ensure that program offices monitor at least 10 percent of their open award funds as required by Public Law 109-162, “Violence Against Women and Department of Justice Reauthorization Act of 2005.” Additionally, OAAM reviews policies and procedures to ensure a consistent level and quality of monitoring across OJP and the COPS Office, and identifies and implements improvements, as necessary.³

In FY 2008, we issued our first annual monitoring report, Assessment Report 2008-01, “FY 2007 Programmatic Monitoring Report,” which summarized the monitoring activities of OJP and the COPS Office. That report also described improvements to monitoring policies and procedures, and contained recommendations for further improvements for OAAM to achieve in FY 2008.

This year’s annual report, “FY 2008 OJP and COPS Office Programmatic and Financial Monitoring,” describes our progress with implementing the

¹ Grant Manager’s Manual (April 2008).

² For a detailed outline of monitoring process in OJP and the COPS Office, please see Appendix A.

³ For more detail on OAAM’s monitoring oversight methodology, please see Appendix B.



recommendations from the FY 2007 report. It provides an analysis of OJP and COPS Office monitoring trends from FY 2008 and outlines plans to further improve monitoring policies and procedures for FY 2009.



Improved Monitoring Policies and Procedures

The “FY 2007 Programmatic Monitoring Report” provided a series of recommendations to improve grant monitoring tools, policies, and procedures. Table 1 summarizes the FY 2007 recommendations and the policy, process, or tool implemented in FY 2008 in response to each recommendation. More details about the recommendations and improvements are in the sections following the table.

Table 1. FY 2007 Recommendations and FY 2008 Improvements

#	FY 2007 Recommendation	FY 2008 Improvement
1	Continue to meet or exceed established monitoring targets.	Continued OAAM quarterly tracking and reporting
2	Develop site visit report standards and offer training to grant managers.	Developed the Grant Monitoring Tool
3	Develop standardized monitoring procedures to be used across all OJP offices.	Developed the Grant Monitoring Tool
4	Develop a standardized site visit report planning process and provide training.	Developed the Grant Assessment Tool
5	Modify the Grant Management System (GMS) to support date stamp on site visit report uploads.	Completed a functional requirements document for adaptive maintenance to GMS monitoring module
6	Encourage follow-up on site visit findings through execution of corrective action plans.	Completed a functional requirements document for adaptive maintenance to GMS monitoring module

OAAM Quarterly Monitoring

The FY 2007 report recommended that OJP and the COPS Office continue to meet or exceed established on-site monitoring targets (Recommendation 1). In FY 2008, we continued to track OJP and COPS Office monitoring progress against established monitoring targets. Although monitoring has many components, including desk reviews, site visits, and substantive grantee interaction, we focused on site visits because site visits provide the most intensive review of grantee performance. To



track monitoring progress, each quarter we required program offices to review their monitoring plans and provide information on site visits that were completed, newly planned, moved to a new quarter, or removed from the plan.

We validated site visit activity by confirming that site visit reports were uploaded into GMS for OJP offices.⁴ For the COPS Office, we reviewed hard copies of site visit reports uploaded into the COPS Management System (CMS).⁵ Because GMS does not date stamp reports upon upload to the system, we were unable to confirm whether site visit reports were uploaded 45 days after the site visit end date, as required by the Grant Manager's Manual (GMM). Therefore, the validation process began 45 days after the end of each quarter, since that would be the maximum time limit for submitting site visit reports for that quarter.

Through the quarterly monitoring process, we generated scorecards for OJP and COPS Office leadership to provide summary data on completed monitoring progress and planned site visits. Scorecards contained office-specific information on the actual amount of monitoring completed compared with target and planned amounts, Grant Monitoring Tool (GMT) usage statistics, and the results of our site visit documentation reviews.

Grant Monitoring Tool

Recommendations 2 and 3 both addressed the need for OJP site visit report standards and to ensure that OJP grant managers collect and analyze essential data on grantee progress during site visits. In response to those recommendations, we updated the GMM to include the requirement that offices use two elements of the GMT in FY 2008: the site visit checklist and the site visit report template. The checklist and template include programmatic, administrative, and financial components that grant managers should review on every site visit. More than 200 grant managers received training on the tool during the first quarter of 2008, and additional training was provided throughout the year.

The GMT also included letter templates and a desk review checklist for OJP offices to use as replacements for a variety of office-specific letter templates and desk reviews. Although we did not require the use of those elements,

⁴ Although the GMT was required for use in FY 2008, we credited offices for on-site monitoring of individual grants if there was a substantive upload for that grant in GMS. Uploads included complete and incomplete GMTs, office site visit reports, office-specific checklists, or detailed post-site visit letters with findings.

⁵ In FY 2007, we reviewed CMS and determined that the system incorporated GMT requirements. Therefore, the COPS Office is not required to use the GMT and instead posts their site visit reports in CMS. We do not have access to CMS, so the COPS Office provided hard copies of uploaded site visit reports for us to validate.



we encouraged program offices to use them and we tracked usage across offices. Grant managers used multiple versions of desk review checklists, did not always upload these reviews to GMS, and did not conduct desk reviews prior to a site visit, as required by the GMM. Because desk reviews are a critical element of grant monitoring, we plan to develop desk review guidelines in FY 2009.

Grant Assessment Tool

In response to the FY 2007 recommendation to develop a uniform, rigorous site visit report planning process and provide training (Recommendation 4), we developed the Grant Assessment Tool (GAT). The GAT allowed OJP and COPS Office grant managers to assess their grants against standard criteria to determine which grants were most in need of on-site monitoring. This Microsoft Excel-based tool required grant managers to provide “yes/no” responses to the 15 standard assessment criteria for each grant award. The GAT calculated a monitoring priority score based on nonweighted values assigned to criteria responses. This score indicated whether the grant monitoring priority was high, medium, or low.

Using the grant’s monitoring priority score, coupled with knowledge about the grant award, grant managers determined whether they would conduct a site visit for that grant during the fiscal year. Based on these decisions, OJP and the COPS Office developed a programmatic site visit monitoring plan. We compiled this programmatic monitoring plan information and merged it with the Office of the Chief Financial Officer (OCFO) financial monitoring plan to create an overall programmatic and financial monitoring plan for FY 2008.

In March 2008, at the end of the assessment period, we solicited feedback from GAT users on ways to improve the tool. They suggested the following:

- updating criteria response options to better correspond with each criterion; that is, allowing for “high/medium/low” or “yes/no” responses where appropriate;
- adding weighted values to responses and revising monitoring priority scoring to produce more meaningful ranges for each OJP office;
- transitioning the GAT to a Microsoft Access-based tool to remove the limitations present in the Microsoft Excel-based tool, such as a cumbersome data management process, data integrity issues, and version control issues;



- updating the GAT so that it can be used to complete desk reviews, and so that monitoring decisions based on completed desk reviews can be incorporated into the annual monitoring plan; and
- adding the capability for program offices to use the GAT to provide quarterly monitoring updates against their monitoring plans.

Throughout FY 2008, we addressed these suggested improvements to the OJP GAT by updating assessment criteria and values. We also transitioned the tool to Microsoft Access for OJP use in FY 2009. The COPS Office implemented similar improvements, and based on office-specific assessment requirements, modified the GAT to address its specific programs and processes. The COPS Office modifications to the GAT and assessment criteria are similar to those of OJP, which ensures a uniform process across program offices.

To prepare for the roll out of the Access-based tool in October 2008, we created a new GAT User Guide, trained more than 100 OJP grant managers, and established a monitoring Help Desk. We also updated the GMM to reflect changes in the grant assessment and on-site monitoring planning processes. In FY 2009, we will continue to improve the GAT based on user feedback. We will also analyze the GAT data to evaluate and report on trends to determine whether the GAT results in priority-based monitoring plans as intended.

Functional Requirements Document

In response to FY 2007 Recommendations 5 and 6, and to improve on the GMT requirements, in FY 2008 we completed a functional requirements document for adaptive maintenance to OJP's monitoring module. To develop the functional requirements document and to encourage stakeholder collaboration, we conducted 11 meetings with the Monitoring Working Group, consisting of members from OJP program offices, the COPS Office, and the OCFO. The module will provide documentation workflow, date stamp activities performed in the system, improve compliance with monitoring documentation requirements and deadlines, enhance the grant manager's ability to track findings, and encourage grant managers to follow up with grantees through execution of corrective action plans, when appropriate. The Office of the Chief Information Officer approved the functional requirements documents in September 2008; we will work with that office to roll out the new GMS monitoring module in FY 2009.



FY 2008 OJP and COPS Office Monitoring Statistics

In FY 2008, we completed the following activities:

- tracked the number of grants and amount of grant funds monitored by OJP and the COPS Office to measure their progress in meeting target and planned monitoring goals,
- assessed OJP compliance with using required elements in the GMT and tracked use of nonrequired elements,
- reviewed documentation for a sample of completed site visit reports and rated reports in two categories: evidence that the grant manager completed a thorough review of grantee compliance and evidence that the grant manager conducted a sufficient level of analysis, and
- reviewed the sample to determine whether GMT use in OJP affected the quality of site visit documentation.

Monitoring Levels

Public Law 109-162, “Violence Against Women and Department of Justice Reauthorization Act of 2005,” requires OJP to monitor at least 10 percent of its total open and active⁶ award funding each year. We refer to this 10-percent requirement as **target monitoring**. To ensure they meet or exceed the monitoring target, the program offices create an annual programmatic monitoring plan. We refer to the amount in the plan as **planned monitoring**.

To create the monitoring plan for FY 2008, OJP and the COPS Office used the GAT to assess open, active awards, and used those assessments and their knowledge of the grant awards to create a priority-based plan. Each quarter, we verified that the offices completed their planned site visits, as demonstrated by the posting of a report in GMS for OJP, and a posting of required documentation in CMS for the COPS Office.

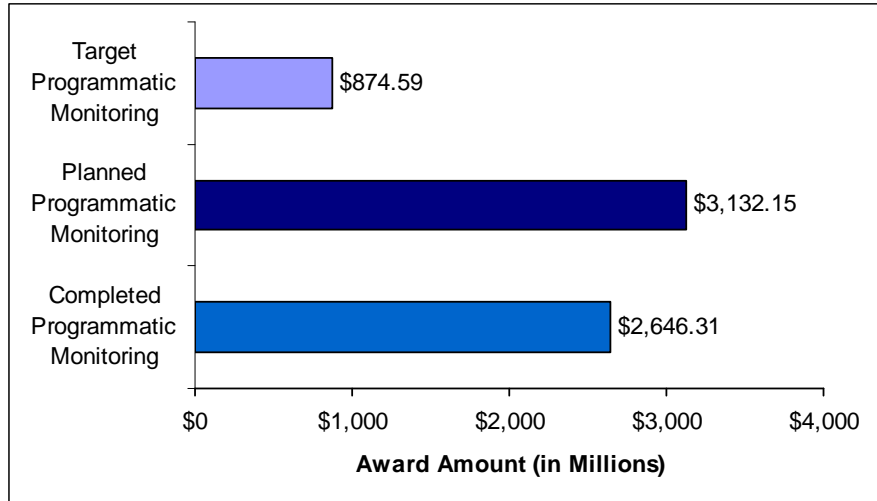
As shown in Figure 1, in FY 2008, OJP and the COPS Office greatly exceeded the target of monitoring 10 percent of funds, but they did not

⁶ Grants are considered open and active when the grantee has accepted the grant award, the project period has started and not expired, and the grant has not been put in a special “hold” status for audit or other serious performance issues.



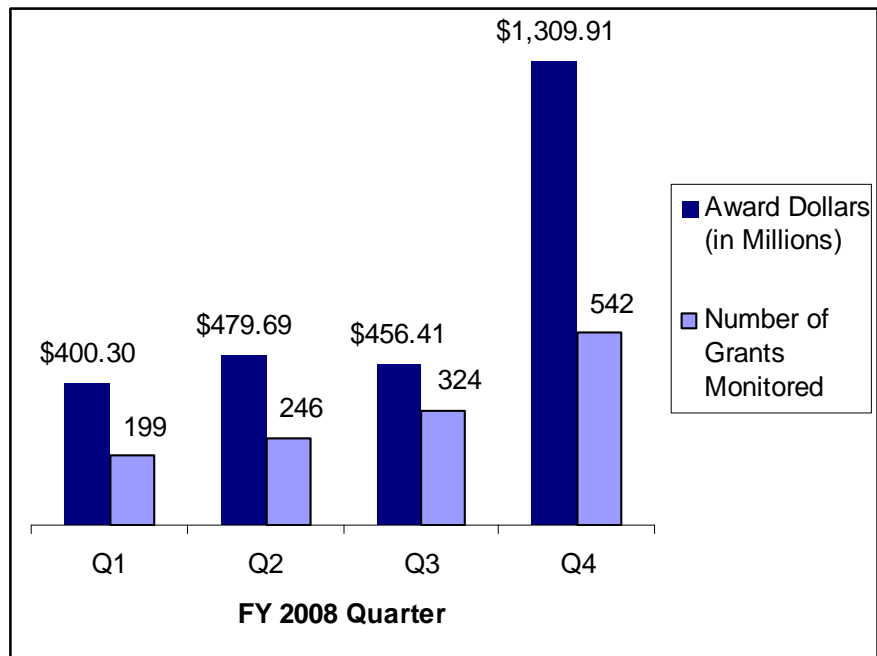
monitor all of the grants included in their original FY 2008 monitoring plan. The target, planned, and completed levels of monitoring are discussed in greater detail in the following sections.

Figure 1. Target, Planned, and Completed Programmatic Monitoring for OJP and the COPS Office



By midyear, OJP and the COPS Office had collectively exceeded the 10-percent target (\$874.59 million) for programmatic monitoring. Specifically, by the end of the second quarter, OJP and the COPS Office had conducted programmatic monitoring of 445 grants, totaling \$879.99 million, as shown in Figure 2.

Figure 2. Completed Programmatic Monitoring for OJP and the COPS Office in FY 2008, by Quarter

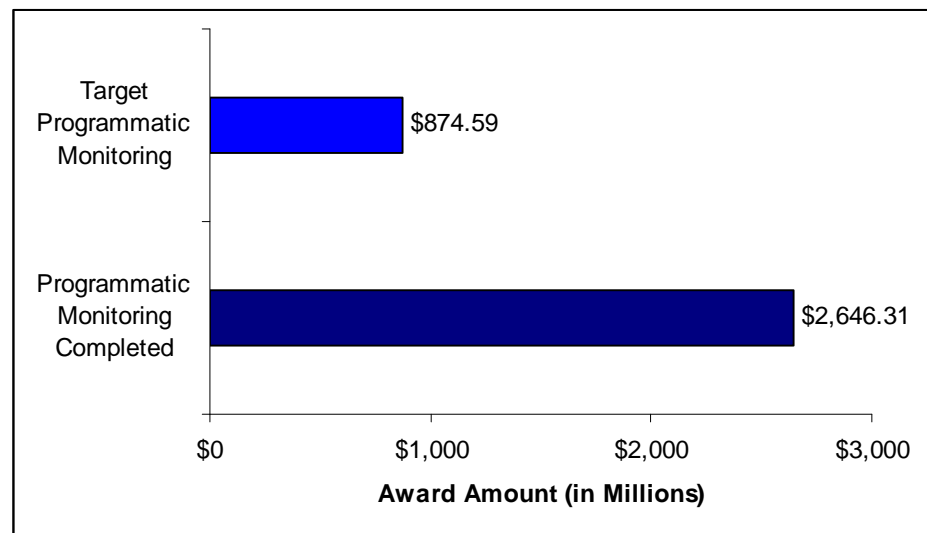




Target Monitoring

The total open, active award funding amount at the start of FY 2008 for OJP and the COPS Office was \$8,745,947,388.⁷ Therefore, the total programmatic target monitoring (10 percent) for FY 2008 was \$874,594,739. Throughout the fiscal year, OJP and the COPS Office monitored 1,311 grants representing \$2.65 billion in open, active award funding.⁸ Figure 3 shows target and completed programmatic monitoring amounts.

Figure 3. Target and Completed Programmatic Monitoring for OJP and the COPS Office in



Each program office within OJP and the COPS Office individually exceeded the 10-percent monitoring target as well. Overall, the total OJP and COPS Office programmatic monitoring level exceeded the target level for FY 2008 by more than \$1.77 billion. Table 2 presents OJP and COPS Office target monitoring levels, completed monitoring, and the difference between the two amounts.

⁷ This value is the total value of open active awards for all of OJP and the COPS Office with the exception of the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART Office). In FY 2008, the SMART Office was in the process of making its first awards; thus, the SMART Office is not covered in this report.

⁸ Numbers that appear in this report are rounded to the nearest one hundredth decimal place. However, all dollar value and percentage calculations have been computed using full numbers.



Table 2. FY 2008 Target and Completed Programmatic Monitoring by Office*

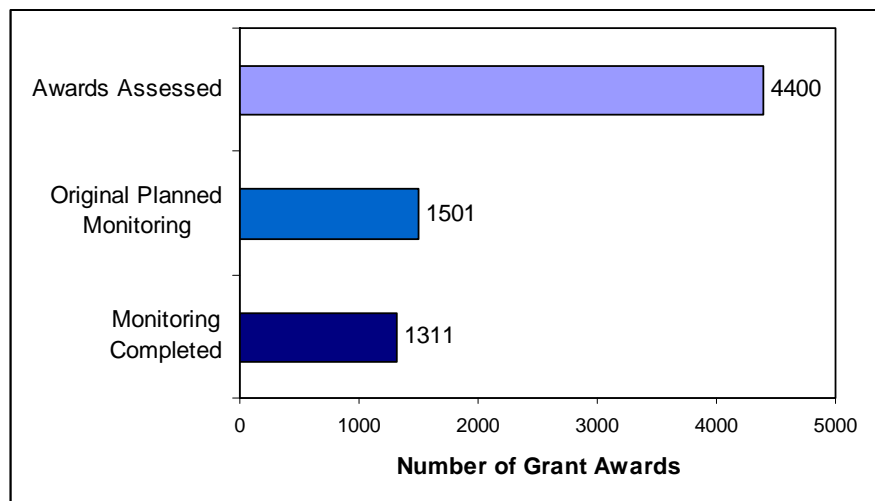
Office	Monitoring Target (10%)	Monitoring Completed	Exceeded Target By
	(in Millions)		
Bureau of Justice Assistance	\$369.20	\$1,681.34	\$1,312.14
Bureau of Justice Statistics	\$13.57	\$25.41	\$11.84
Community Capacity Development Office	\$7.13	\$13.43	\$6.30
National Institute of Justice	\$68.12	\$75.55	\$7.43
Office of Community Oriented Policing Services	\$148.46	\$184.96	\$36.50
Office of Juvenile Justice and Delinquency Prevention	\$112.55	\$314.03	\$201.48
Office for Victims of Crime	\$155.56	\$351.60	\$196.04
Total	\$874.59	\$2,646.31	\$1,771.72

* Due to rounding, the figures in this table may not sum properly.

Planned Monitoring

Based on GAT assessments of 4,400 grants, OJP and the COPS Office developed priority-based programmatic site visit monitoring plans that included 1,501 grants to be site visited in FY 2008. As shown in Figure 4, by the end of FY 2008, OJP and the COPS Office monitored 1,311 grants, or 190 fewer grants than planned.

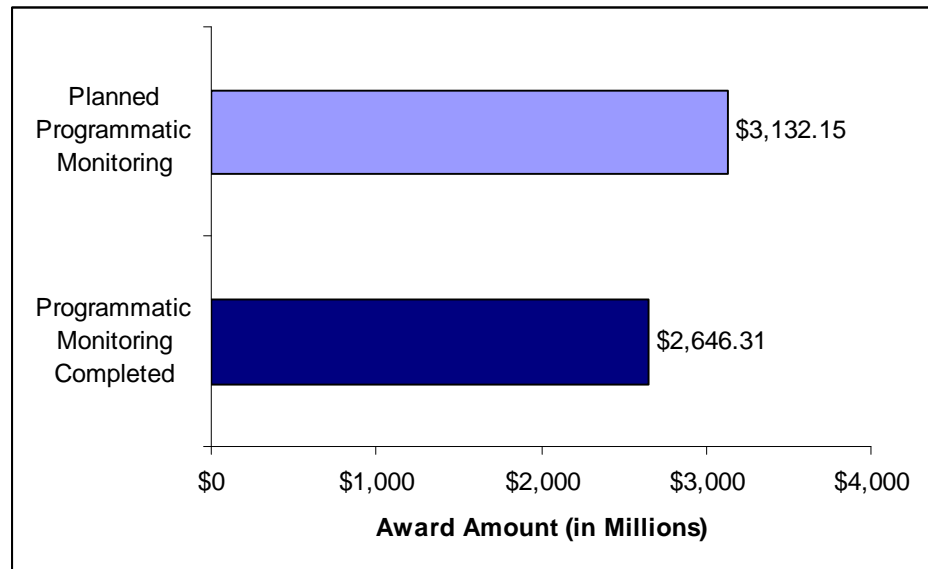
Figure 4. Awards Assessed, and Planned and Completed Monitoring for OJP and the COPS Office in FY 2008



The 1,501 grants in the original monitoring plan totaled \$3.13 billion. By the end of the year, OJP and the COPS Office had conducted programmatic monitoring for \$2.65 billion, or \$485.83 million (16 percent) less than their programmatic monitoring plan, as shown in Figure 5.

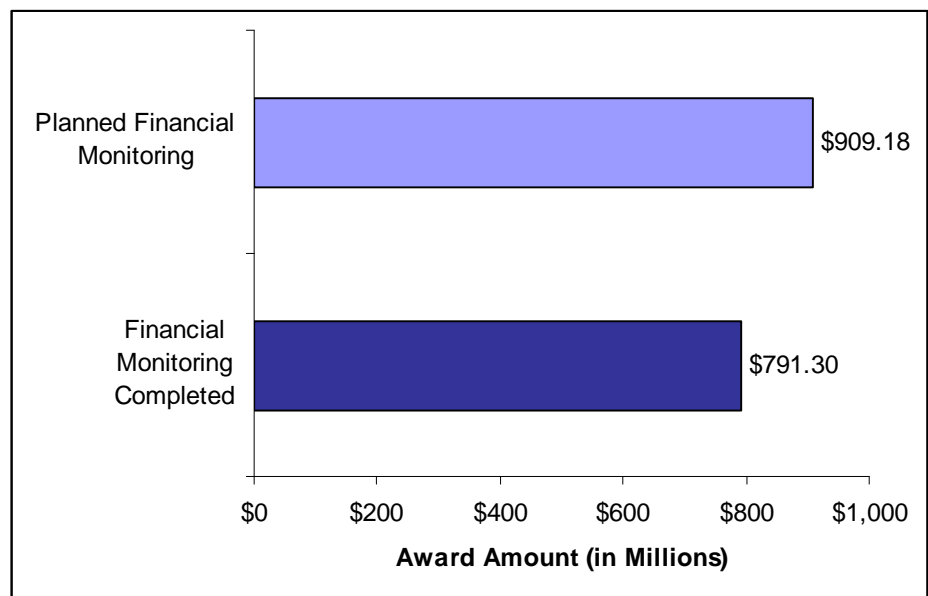


Figure 5. Programmatic Monitoring Planned and Completed in FY 2008



In addition to tracking programmatic monitoring, we tracked financial monitoring in FY 2008. At the beginning of the fiscal year, OCFO planned to conduct financial monitoring of \$909.18 million in open and active award funds. By the end of the year, OCFO had conducted financial monitoring for \$791.30 million, or \$117.88 million (13 percent) less than the original plan, as shown in Figure 6. Note that because OJP and the COPS Office coordinate with OCFO to arrange monitoring visits, some grants will receive both programmatic and financial monitoring in the same fiscal year, which results in some grant awards being counted twice in actual monitoring numbers. In FY 2009, we plan to conduct a detailed review of financial monitoring activities.

Figure 6. Financial Monitoring Planned and Completed in FY 2008





GMT Usage Across OJP

In addition to tracking the award funding amount of grants monitored at OJP and the COPS Office, we assessed OJP compliance with GMT usage. Since October 2007, OJP has been required to use two elements of the GMT for on-site monitoring visits: the site visit checklist and site visit report. These elements were developed and required to ensure program office site visit documentation would be consistent in the type and depth of information presented. OJP conducted programmatic monitoring for 1,236 grants in FY 2008. Overall, 919 (74.35 percent) of reports uploaded into GMS were completed using both required GMT elements.⁹ Table 3 shows the percentage of reports completed using both, one, or neither of the required GMT elements, by OJP program office.

Table 3. FY 2008 Usage of Required GMT Elements Across OJP Program Offices

Office	Percentage of Reports Completed Using Both Required GMT Elements	Percentage of Reports Completed Using One Required GMT Element	Percentage of Reports Completed Using Neither Required GMT Element
Bureau of Justice Assistance	71.41%	15.38%	13.21%
Bureau of Justice Statistics	100.00%	-	-
Community Capacity Development Office	65.67%	31.34%	2.99%
National Institute of Justice	44.44%	55.56%	-
Office of Juvenile Justice and Delinquency Prevention	77.53%	17.72%	4.75%
Office for Victims of Crime	85.45%	14.55%	-
All OJP Offices	74.35%	16.91%	8.74%

We reported GMT usage figures to each of the program offices on a quarterly basis and worked to improve usage throughout the fiscal year. As a result, for all OJP offices combined, GMT usage improved in each successive quarter.

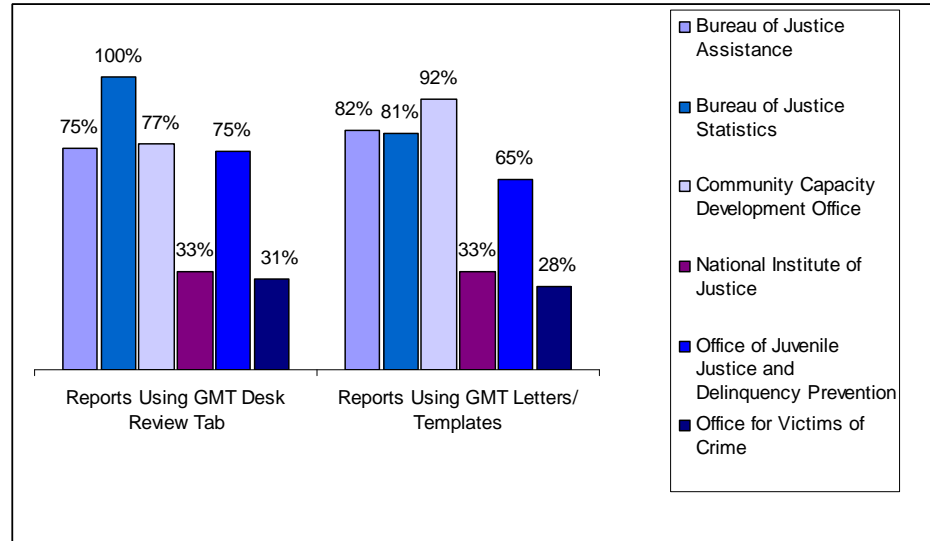
The GMT includes additional elements that the program offices are not required to use, such as desk review checklists and templates for letters and corrective action plans. To gauge the extent to which offices used these

⁹ In some instances, multiple awards can be included in one site visit report. Because we reviewed site visit reports for each award, the figures in the GMT Usage section may include data from the same report multiple times.



nonrequired elements, we recorded whether GMT files contained completed desk reviews and whether grant managers uploaded site visit letters (in either the GMT template format or an office-specific format) to the GMT. As shown in Figure 7, use of nonrequired elements varied across program offices. Use ranged from 31 to 100 percent for the GMT desk review checklist, and from 28 to 92 percent for GMT letters/templates.

**Figure 7. FY 2008
Usage of Nonrequired
GMT Elements Across
OJP Offices**



Site Visit Documentation Review

Site visit reports are one of the primary sources of information on grantee performance for OJP and the COPS Office; therefore, the quality of the monitoring documentation, which includes a checklist and a report, is critical. To gauge the quality of OJP and COPS Office site visit documentation, we examined a sample of site visit reports to determine whether the reports and checklists contained evidence of the grant manager's review of grantee compliance and an analysis of grantee performance.

For FY 2008, we reviewed 151 OJP and COPS Office reports, which was a proportionate sample of 10 percent or a minimum of 10 completed reports for each program office. The review examined whether there was a relationship between report quality and GMT usage for the 141 OJP reports in the sample.

It is important to note because we reviewed documentation and not actual site visits conducted by grant managers, we could not validate the information reported by the grant manager, nor determine whether the grant manager reviewed all of the compliance elements on the GMT site



visit checklist. For FY 2009, we plan to develop a more rigorous and objective method for overseeing site visit monitoring. For additional information on our quality rating methodology, please see Appendix B.

Review of Grantee Compliance

We assessed whether the report contained evidence of the grant manager's review of grantee compliance. For example, we looked at whether the grant manager reported on grantee compliance with basic financial, program, and administrative requirements, as well as Department of Justice and other federal requirements. Of the sampled reports, 68 percent contained strong evidence of a compliance review. This result indicates that the majority of site visit reports and GMT checklists contained a review of programmatic, administrative, and financial compliance aspects of grantee performance.

Level of Analysis

We also determined whether reports contained evidence of meaningful conclusions about the program based on data the grant manager collected on site. For example, we looked at whether reports included an analysis of grantee progress toward meeting stated goals and objectives, how well implementation was progressing, and specific corrective actions to address any identified challenges. More than half (58 percent) of the OJP and COPS Office reports in the sample had strong evidence that the grant manager conducted meaningful analysis.

Effect of GMT Use

For the 141 OJP site visit reports in the sample, we also wanted to determine whether GMT use seemed to affect the quality of site visit documentation. We reviewed the sample to determine whether reports completed using the GMT had stronger evidence of a thorough compliance review and a sufficient level of analysis. The data suggest a slight correlation between using the GMT and having better documentation of the compliance review and analysis. However, because only 6 out of 141 reports in our sample were completed *without* use of the GMT, and because elements of the documentation review were qualitative rather than quantitative, we cannot definitely conclude that use of the GMT led to more thorough reviews of grantee compliance and performance.



FY 2009 Planned Activities

The policies and procedures we implemented in FY 2008 and described in this report were based on the recommendations from the “FY 2007 Programmatic Monitoring Report.” Throughout FY 2008, we found opportunities to further improve monitoring activities. Plans for FY 2009 are listed in Table 7 and are described in greater detail in the section that follows.

Table 7. FY 2009 Planned Activities

#	FY 2009 Planned Activity
1	Release the updated, Microsoft Access-based version of the GAT with weighted criteria and improved response options. Incorporate quarterly monitoring update capabilities into the GAT.
2	Propose modifications to the desk review policy for OJP offices.
3	Review FY 2009 GAT usage. Evaluate and report on trends to determine whether the GAT results in priority-based monitoring plans as intended.
4	Support the development of the GMS monitoring module. Release the module and develop a training curriculum that incorporates monitoring policy and process changes resulting from the new module.
5	Conduct an assessment of OJP and COPS Office post-site visit activities to determine grant manager compliance with post-site visit follow-up activities.
6	Conduct a review of financial monitoring activities performed by the OCFO to determine whether adequate financial controls are in place to safeguard OJP funds, ensure compliance with federal laws and regulations, and assist grantees in administering their grants.
7	Improve oversight methods for site visit monitoring. For example, develop methods to validate the accuracy of grant monitoring documentation and objectively review site visit report quality.

- 1. Release the updated, Microsoft Access-based version of the GAT with weighted criteria and improved response options. Incorporate quarterly monitoring update capabilities into the GAT.**

The updated, Microsoft Access-based GAT will be released in FY 2009 to make the monitoring assessment and planning process easier for program offices to manage. It was also help ensure that monitoring priority scores



were meaningful to the program offices. We will modify the GAT to allow grant managers to complete quarterly updates within the tool. This capability will preserve data integrity and combine several functionalities in one place resulting in a more efficient assessment and quarterly update process.

2. Propose modifications to the desk review policy for OJP offices.

In FY 2008, program offices were completing desk reviews using a variety of formats, such as the desk review template in the GMT and office-specific templates. Additionally, program offices did not have a uniform way to track desk reviews completed by their grant managers. In an effort to establish uniform processes and policies across OJP, in FY 2009, we will propose a new desk review policy to OJP stakeholders. The new policies will require grant managers to use the updated GAT to conduct desk reviews and to upload GAT desk reviews into GMS. This process will also allow grant managers to immediately update the monitoring plan based on information gathered during a desk review in the GAT.

3. Review FY 2009 GAT usage. Evaluate and report on trends to determine whether the GAT results in priority-based monitoring plans as intended.

Grant managers use the GAT at the beginning of each fiscal year to determine which grants are most in need of site visit monitoring. Grant managers select answers to a set of standard criteria for each grant and based on these answers, the grants are assigned a numerical priority score and a categorical priority rating (“high,” “medium,” and “low”). Grant managers were asked to use this information as a guide in planning their priority-based monitoring activities. In FY 2009, we will conduct a formal review of GAT assessments, including a comparison of assessment scores and monitoring priorities and actual monitoring results. The goal of the assessment is to evaluate whether grant managers used the GAT priority ratings to determine which grant to monitor and therefore, whether OJP and COPS grant monitoring is priority-based.

4. Support the development of the GMS monitoring module. Release the module and develop a training curriculum that incorporates monitoring policy and process changes resulting from the new module.

We will continue to require the use of the GMT until the release of the new monitoring module in GMS. The module will provide monitoring



workflow, improve compliance with monitoring documentation requirements and deadlines, enhance the grant manager's ability to track findings, and encourage follow-up with grantees through execution of corrective action plans. By supporting the development of the monitoring module training curriculum, we will be able to incorporate updated monitoring policies with process instructions for the new module.

5. Conduct an assessment of OJP and COPS Office post-site visit activities to determine grant manager compliance with post-site visit follow-up activities.

The "FY 2007 Programmatic Monitoring Report" recommended that grant managers be encouraged to follow up with grantees through the execution of corrective action plans, which outline issues identified during site visits. In FY 2008, OAAM's Audit and Review Division conducted an Office of Management and Budget Circular A-123 review of OJP's grant management internal controls, citing issues with OJP grant manager compliance with post-site visit follow-up activities. In response to the FY 2007 report recommendations and to determine the extent of the issues identified in the Audit and Review Division report, we will conduct an assessment of site visit monitoring follow-up activities.

6. Conduct a review of financial monitoring activities performed by the OCFO to determine whether adequate financial controls are in place to safeguard OJP funds, ensure compliance with federal laws and regulations, and assist grantees in administering their grants.

To expand our review of financial monitoring and in response to a request from the OJP Office of the Assistant Attorney General, we plan to conduct an assessment of the OCFO financial monitoring process. OCFO is responsible for reviewing the financial and administrative operations of OJP and COPS Office grantees. As part of this responsibility, OCFO conducts site visits to determine whether the grantee properly accounted for the receipt and expenditure of federal funds, and whether the grantee's expenditures are in compliance with federal requirements and award special conditions. The overall purpose of our assessment will be to determine whether OCFO's financial monitoring process provides effective oversight of the financial and administrative operations of grantees. We will determine the extent to which OCFO analyzes the grantee's accounting system and the internal controls related to the receipt and disbursement of federal funds.



7. Improve oversight methods for site visit monitoring. For example, develop methods to validate the accuracy of grant monitoring documentation and objectively review site visit report quality.

In FY 2007 and FY 2008, we reviewed a sample of reports for quality and content to ensure that grant managers collect the appropriate data and provide sufficient analysis of information collected during site visits. However, we did not determine the accuracy of the information grant managers provided in site visit reports. Therefore, for FY 2009, we will develop an approach to review the information contained in site visit reports to ensure that it accurately reflects the fiscal and programmatic performance of the grantee.

Implementing these planned activities in FY 2009 will further improve monitoring activities and assist OJP and the COPS Office in fulfilling their responsibility to ensure the fiscal and programmatic integrity and accountability of their grantees.

**OJP and
COPS Office
Response**

We provided a draft of this report to OJP and the COPS Office. No written response was required and none was received. Therefore, we are publishing this report in final form.

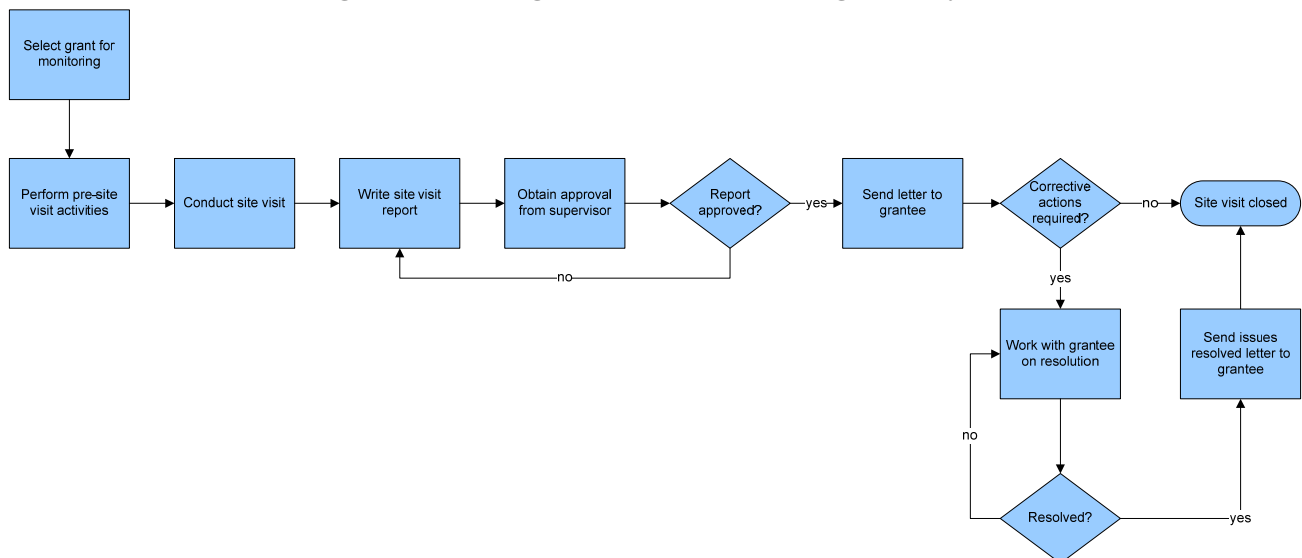


Appendix A. OJP and COPS Office Monitoring Process

OJP ensures the fiscal and programmatic integrity and accountability of its grantees through proactive monitoring.* Programmatic monitoring addresses the content and substance of programs by employing desk reviews, site visits, and substantive grantee interaction. Each year, OJP and the COPS Office assess risk and performance of their grants, determine which grants are most in need of on-site monitoring, and plan site visit activities accordingly. Throughout the fiscal year, grant managers conduct on-site monitoring visits, collecting pertinent administrative, financial, and programmatic information to assess grantee performance and compliance with programmatic and federal grant administration requirements. After conducting a site visit, grant managers are required to complete a site visit report to document site visit activities and conclusions, as well as a post-site visit letter outlining findings and recommendations, if applicable.

As shown in Figure A-1, the on-site monitoring life cycle begins with selecting a grant for monitoring and ends with resolving findings. If grant managers have no findings and determine the grantee does not need training and technical assistance, the monitoring cycle ends with a letter to the grantee confirming that no further action is required.

Figure A-1. Programmatic Monitoring Life Cycle



* Grant Manager's Manual (April 2008).



Appendix B. Monitoring Oversight Methodology

OAAM Quarterly Update Process

The FY 2008 monitoring plan outlined the programmatic and financial monitoring site visits planned, with OJP and the COPS Office establishing a programmatic monitoring target of at least 10 percent of its total open, active award amount. Recognizing that monitoring plans are not static, we updated the monitoring plan at the end of each quarter to reflect information provided by offices about site visits completed, newly planned, moved to future quarters, or removed from the plan.

Each quarter, working in conjunction with OJP and the COPS Office, we conducted quarterly programmatic monitoring reviews to verify actual grants monitored and validate completion of site visits, as evidenced by documents uploaded in GMS or CMS, respectively. For FY 2008, OJP grant managers were required to use the GMT to complete a checklist and a report to document site visit activities. For a site visit to be considered complete, we required that the uploaded documents contain detailed information related to the site visit, including complete and incomplete GMTs, office site-visit reports, office-specific checklists, or substantive post-site visit letters.

COPS Office site visit reports must be uploaded to CMS within 17 calendar days of the site visit. OJP site visit reports must be uploaded to GMS within 45 calendar days of the site visit. CMS date stamps site visit reports at the time the reports are uploaded, but GMS does not have this capability. As a result, we were unable to verify that OJP site visit reports were uploaded to GMS within 45 calendar days of the site visit. Instead, we verified that OJP site visit reports were uploaded within 45 days after the end of the quarter, since grant managers have until the last day of the quarter to conduct site visits. We required grant managers to upload site visit reports to GMS or CMS by November 14, 2008, for the report to be counted toward the FY 2008 monitoring requirement.

OAAM Methodology for Review of Site Visit Documentation

In conjunction with the quarterly review of monitoring, we reviewed a sample of completed site visit reports, as detailed in the “Site Visit Documentation Review” section of this report.

The following describes our methodology for reviewing the site visit reports. The reviews of site visit reports are qualitative rather than



quantitative, and thus are somewhat subjective, much like the site visits themselves. Further, report types and formats vary greatly across OJP and the COPS Office, which is largely explained by the varied report requirements and program- or office-specific styles. To account for these differences, our quality assessment framework contained universal requirements. Working within this framework, we rated each report. In FY 2009, we will refine the methodology by developing methods to validate the accuracy of information included in the reports and to more rigorously and systematically review the quality of the reports.

We randomly selected 10 percent of completed site visit reports for review, or a minimum of 10 completed OJP or COPS Office site visit reports (whichever number was larger). Table 1 shows the total number of site visit reports each office completed, as well as the total number of reports we reviewed.

Table B-1. Number of Site Visit Reports Completed and Number Sampled for Review

Office	# Reports Completed	# Reports Reviewed by OAAM
Bureau of Justice Assistance	689	69
Bureau of Justice Statistics	36	10
Community Capacity Development Office	67	10
National Institute of Justice	18	10
Office of Community Oriented Policing Services	75	10
Office of Juvenile Justice and Delinquency Prevention	316	31
Office for Victims of Crime	110	11
Total	1,311	151

The assessment process consisted of primary and secondary reviews, followed by a final calibration of report ratings. The primary reviewer assessed the site visit report against the established criteria in the Report Quality Review form. The secondary reviewer conducted their own assessment of the report and validated the ratings assigned by the primary reviewer. The reviewers then discussed any discrepancies in ratings and noted any changes in the justification section on the Report Quality Review form. This final calibration was completed in an effort to provide review consistency across OJP and the COPS Office.



To conduct the report quality reviews, we used the Report Quality Review form,* which contained standard criteria for rating the report's review of grantee compliance, level of analysis, and report organization and clarity. We also used the form to track GMT usage for the OJP offices in the sample to determine whether it seemed to affect the other quality ratings.

* The Report Quality Review form identifies the presence or absence of key items in site visit reports. We did not use it to validate the information or data contained within the reports.



Appendix C. FY 2008 Site Visit Monitoring Scorecards

The following pages include the final scorecards for each office and bureau within OJP and the COPS Office.