

**Department of Justice
Office of Justice Programs
Office of the Chief Information Officer**

**Supporting Statement
Grant Management System**

A. Justification

1. Necessity of Information Collection

The collection of information represented in this Paperwork Reduction Act Submission is necessary for the Office of Justice Programs (OJP), U.S. Department of Justice (DOJ), to implement the statutory requirements of the Grant Management System (GMS), including the online Application; grant award; peer review, the Grant Adjustment Notice (GAN); draw down of funds; Post-Award progress and financial reports; and closeouts.

The Department of Justice Reauthorization Act of 2005, 42 U.S.C.A. 3712h(e) provides expressly that:

"(e) GRANT MANAGEMENT SYSTEM -- The Director [of OJP's Office of Audit, Assessment, and Management] shall establish and maintain, in consultation with the chief information officer of the Office [of Justice Programs], a modern, automated system for managing all information relating to the grants made under the programs covered by subsection (b)."

Subsection (b), in turn, includes "[a]ny grant program carried out by the Office of Justice Programs."

The Federal Financial Assistance Management Improvement Act of 1999 (PL106-107) and the E-Grants Initiative both authorize OJP's GMS to collect the information. GMS was developed in part to satisfy requirements of the Federal Financial Assistance Management Improvement Act of 1999. Additional functionality was added in an effort to address the intent of the E-Grants Initiative, which has its origins in the Act, to:

- Improve the effectiveness and performance of federal financial assistance programs.
- Simplify federal assistance application and reporting requirements.
- Improve the delivery of services to the public.
- Facilitate greater coordination among those responsible for delivering the services.

2. Needs and Uses

Originally implemented in 1999, GMS has evolved over the past years into a streamlined, Web-based tool that makes processing grants easier and faster. GMS is integrated with Grants.gov to provide one stop shopping for DOJ grants.

The Grants.gov website serves as a central storehouse for information on federal grant programs. By registering once on this site, an individual or organization can apply for grants from the 26 federal grant-making agencies. DOJ uses Grants.gov to post solicitations announcing to the public that grant money is available. Through its interface with Grants.gov, GMS receives applications for processing from OJP, the Office on Violence Against Women (OVW) and the Department of Homeland Security, Grants and Training.

GMS provides automated support throughout the grant lifecycle. For non-competitive grants, GMS receives and processes grant applications. GMS generates award documents for all successful competitive and non-competitive applications. Post grant award activities include grant monitoring, financial and programmatic progress reporting, and maintenance of grant information files.

The system facilitates reporting to Congress and other interested agencies. The system provides essential information required to comply with the Federal Funding Accountability and Transparency Act of 2006 (FFATA).

3. Use of Information Technology

GMS has dramatically improved the efficiency of the grant process by reducing cost, saving time, and eliminating excessive paperwork. Since 2004, GMS has demonstrated a decrease in time for grant processing. For example, the grant adjustment notice and approval process has been streamlined from 26 days as a paper process to an average of 17 days in GMS in FY 2007.

The collection of information covers a wide range of necessary activities for grant application, processing, adjustments, reporting, and closeout. These include:

- a. **Online Application:** Applicants for funding complete the SF-424 form online through collection means that emulate and repeat the same features and questions that previously used hard copy forms. The online form allows the applicant/respondent to complete the form, correspond with the Program Office, submit a form, and provides all necessary guidance and help to use the technology. The Online Application includes—
 - (1) **Peer Review:** Applications that have been collected from respondents are supplied to a Program Office group of selected reviewers chosen from field experts. These individuals are given access to a select group of applications for on-line review.

- (2) Award Notification: GMS notifies applications of their award with an electronic award package. GMS also notifies Congress and additional stakeholders of the award.
- b. Grant Adjustment Notice: OJP and OVW grantees started using the GAN module in Fiscal Year 2006 to make any and all necessary changes to their awards through the online system that automatically updates their information in the financial system as well. Previously, grantees had to submit paper copies for all grant adjustments; now with the online tool, processing time has been greatly reduced.
- c. Drawdown: Grantees that are awarded certain types of funding drawdown their funds electronically. Furthermore, the processing and logging of draw down funds are processed electronically between the Treasury Department and OJP's database.
- d. Progress/Financial Reports: OJP and OVW applicants are required to report their post-award activities in a variety of progress and financial reports through the online system. Applicants generally have to report their activities through the online system on a quarterly or semi-annual basis. The use of the online tool to accomplish this centralizes all the progress and financial reports in one system for online review thus reducing the burden of maintaining financial and programmatic reports years after an award. This includes—
 - (1) Progress Reports collects and manages programmatic progress reports (form based)
 - (2) Financial Status Report (FSR) collects SF-269 financial progress reports and will be integrated into GMS during the first quarter of FY 2008
 - (3) Grant Monitoring Office of Comptroller (GMOC). GMOC provides the capability to track financial site visits and audits.
 - (4) Monitoring Module: Internal Users submit programmatic site visits in GMS. The monitoring module also allows the grant manager to track deliverables and corrective actions.
- e. Closeouts: With the development and implementation of the web-based closeout module, OJP and OVW grantees are now required to closeout out their awards using the electronic internet interface. Paper submissions are no longer accepted. The electronic interface has been built to interact with the other online grant management modules (e.g. GAN, Progress Reports) seamlessly.

The use of information technology and a web-based system greatly assists any respondent in supplying the necessary data.

For further description of the pages, and the information they collect, see the job aids at <http://www.ojp.gov/gmscbt/>

4. Efforts to Identify Duplication

All information being requested from applicants and grantees is specific to OJP and OVW grants and would not be collected by any other organizations. GMS allows grantees and OJP grant managers the ability to verify and certify the information and avoid reentry of data.

5. Burden on Small Businesses

The impact of the GMS system to small business and other small sized entities is the record-keeping abilities to locate and manage all of the information about their OJP and OVW grants in one centralized location.

6. Consequences of Not Conducting or Less Frequent Collection

The non-collection of data would prohibit OJP and OVW from carrying out its mission to solicit applications and award grants for criminal justice and victim assistance programs as well as to conduct statutorily required post monitoring of the award.

7. Special Circumstances

The programmatic needs of specific solicitations for funding, in rare occasions, will request materials that are not within the normal reporting cycle, such as unexpected Grant Adjustment requests. Certain requests may often include voluminous materials such as Memorandums of Understanding or singularly unique items such as Letters of Support, which are unique to the author and applicant and are frequently only available in hard copies.

To satisfy the needs of supplying these items to the Program Office that requests them, software is used to scan and maintain as electronic files the images of these documents, which are then attached to the application and award materials previously collected or generated online.

8. Public Comments

A notice has been posted in the Federal Register for 60 and 30 days and no public comment was received.

9. Payments and/or Gifts to Respondents

There is neither payment nor gifts given to respondents outside of merited funding.

10. Assurances of Confidentiality

All information on the collection tool is collected in accordance with the Privacy Act. Any release of information will conform to the stipulations of the Privacy Act Authorization for Release Information. Only those individuals with a valid identification and password are authorized to access the personal information. A Privacy Notice is displayed on the GMS sign-in

page. The GMS Privacy Impact Assessment is available to the Public at http://www.ojp.usdoj.gov/GMS_PIA_01292007.pdf

11. Justification for Sensitive Questions

There are no questions of a private nature as defined by the guidance provided for this questionnaire in the Grant Management System.

12. Estimate of Hourly Burden on Respondents.

Estimations of time are based on average annual activity broken down by module.

<u>Module</u>	<u>Avg. Yearly Hours Spent</u>	<u>FY 2007 Number of Respondents</u>
Total Hours for New Applications	2	
Active Awards:		
Reports (financial/progress) & Monitoring	4	
Grant Adjustments (GANS)	1	
Closeout	1	
Total Hours for Active Awards	6	
Estimated number of respondents for New Applications:		16,836
Estimated number of respondents for Active Awards:		17,261
Hourly Burden for New Applications (Yearly)	33,672	
Hourly Burden for Active Awards (Yearly)	103,566	
Total Hourly Burden (Yearly):	137,238	

13. Estimate of Cost Burden for Respondents

The estimate of the total annual cost to respondents is minimal. The cost of internet access can be nullified by use of public internet service providers such as public libraries or similar facilities. The GMS incurs no special fee from a respondent, and requires no purchases or costs to complete the collection tool. The effort spent on paper-based reporting would be significantly higher to respondents due to the costs of production of a paper form, postal service, and other necessities of a paper-based system.

14. Annualized Cost to the Federal Government

There are approximately 17,261 active grant awards (covering FY 2000 to the present) within GMS, and federal government employees spend an average of 7.8 hours annually doing work on

each active award. There are approximately 16,836 new applications each year and federal government employees spend an average of 12 hours a year processing each application.

17,261 active awards	X	7.8 hours	=	134,635.8	annual hours
16,836 new applications	X	12 hours	=	<u>202,032.0</u>	annual hours
				336,667.8	total annual hours spent

The estimated hourly rate for an OJP employee including benefits is \$48.08.

336,667.8 hours	X	\$48.08	=	\$16,186,988
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Personnel and Benefits	\$16,186,988
Operations & Maintenance	<u>\$ 3,408,158</u>
Total Cost to the Federal Government	\$19,595,146

15. Reason for Change in Burden

The burden hours increase from 2004's filing period was a direct result of the increase in the number of GMS applicants and GMS awards. The burden hours increase also represents the addition of eight functionality enhancements to GMS that eliminate paper reporting collection in favor of electronic collection.

16. Anticipated Publication Plan and Schedule

Publications are not planned at this point in the program; all information collected is required for program implementation.

17. Display of Expiration Date

The OJP and OVW Program Offices are prepared to display all expiration dates.

18. Collection of Information Employing Statistical Methods

Not applicable.