

Department of Justice
Office of Justice Programs
Office of Audit, Assessment, and Management

Supporting Statement
Community Partnership Grant Management System

A. Justification

1. Necessity of Information Collection

The U.S. Department of Justice (DOJ), Office of Justice Programs (OJP) provides 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 is composed of five bureaus and one program office, to include the Bureau of Justice Assistance (BJA), Bureau of Justice Statistics (BJS), National Institute of Justice (NIJ), Office of Juvenile Justice and Delinquency Prevention (OJJDP), Office for Victims of Crime (OVC), and the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART). The collection of information represented in this Paperwork Reduction Act submission is necessary for OJP, to implement the statutory requirements of the Community Partnership Grant Management System (GMS). In addition to use by OJP, GMS is used by the Office on Violence Against Women (OVW) for its grant programs, as well as limited use by the Office of Community Oriented Policing (COPS Office) for programs carried out collaboratively with OJP and OVW., Functionality of GMS include online application submission; peer review; and grant award and award management which includes: Grant Adjustment Notices (GAN); draw down of funds (via the Grant Payment Request System (GPRS)); post-award programmatic progress reports, performance measures, and subaward 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 searching and applying for OJP and OVW grants. Additionally, OJP, OVW, and COPS grant recipients can request payments online using the GPRS system.

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. OJP,OVW, and COPS use Grants.gov to post competitive discretionary solicitations announcing to the public that grant money is available. Through its interface with Grants.gov, GMS receives applications for processing from OJP and OVW, and in limited cases for COPS, for programs carried out collaboratively with OJP and OVW.

GMS provides automated support throughout the grant lifecycle. For non-competitive grants (e.g., formula or block 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 adjustments; grant monitoring; financial, programmatic, and subaward progress reporting; collection of performance measures; and closeout and record maintenance of grant information files. However, grant monitoring and financial reporting are not included in this submission. There is no burden to the public within the GMS grant monitoring module or the financial reporting data collected on SF 425 which is currently approved under OMB Control Number 0348-0061. In 2011, GMS was sanctioned as the OJP official file of record by the National Archive and Records Administration.

In June of 2010, OJP released the Grant Payment Request System (GPRS) that replaced the OJP Phone Activated Paperless Request System (PAPRS). GPRS provides OJP, OVW, and COPS grantees the ability to perform draw down payment requests utilizing a secure OJP website. GPRS has many features that enhance the grantee's ability to manage awards. Some features of GPRS include:

- The ability to view and print a transaction history for an award.
- A Summary of award information such as Award Amount, Hold Amounts, Last FFR (SF-425) Submission and Available Balance.
- The ability to cancel pending payment requests.

- Secure individual log in.

GPRS internal allows OJP, OVW, and COPS staff to review financial award information and manage/view financial holds related to delinquent progress reports, special conditions, and manual holds. GMS 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 allows respondents to fill-out and transmit grant-related forms completely electronically. By utilizing information technology, GMS has dramatically improved the efficiency of the grant process by reducing cost, saving time, and eliminating excessive paperwork.

The electronic collection of information covers a wide range of necessary activities for grant application, award processing, adjustments, reporting, and closeout. Many of the grant application data collections already have OMB approval via the Grants.gov system¹. This submission does not duplicate burden hours for any collections which are at present covered in the Grants.gov system and other OMB approved forms (e.g. SF-424, SF-425, etc.) Electronic collections of information for this submission include:

- a. *Online Application*²: Applicants complete the SF-424 form online through a 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 relevant OJP program office, submit a form, and provides all necessary guidance and help to use the technology. The SF-424 has OMB clearance and is not duplicated in this collection request, however; there are other screens in GMS which collect standard information from applicants and peer reviewers during the peer review process. The Online Application includes, in addition to application submission mentioned above:
 - (1) *Application Information*: Point of contact and organizational information, beyond what is collected in the SF-424, is collected from each applicant to create or maintain a profile in GMS. (Screenshots AP-1 to AP-2)
 - (2) *Peer Review*: Applications 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.

¹ Several grant-related forms have OMB approval via Grants.gov or other OMB clearances. These forms are not duplicated in this collection request and include: Application for Federal Assistance (SF-424), Assurances for Non-Construction Programs (SF-424B), Assurances for Construction Programs (SF-424D), Disclosure of Lobbying Activities (SF-LLL), Federal Financial Report (SF-425), and the Accounting System and Financial Capability Questionnaire (OMB 1121-0021).

² OJP maintains a second collection of information under the OJP Solicitation Template (OMB 1121-0329), which requires grant applicants to collect and attach information into GMS during the application submission stage. Information in 1121-0329 includes such items as the program narrative, budget detail worksheet, project abstract. Since the information in 1121-0329 is collected outside GMS, prior to submitting an application, it is more appropriate for OJP to keep two separate information collections.

(Screenshot PR1)

- b. *Grant Adjustment Notice (GAN)*: 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. GMS has several standard GANs in which the applicant logs into GMS, completes a set of fields and submits the information to OJP for approval. Examples of GANs include, but are not limited to: Change in Point of Contact Information, Change in Project Period End Date, and Removal of Special Conditions. (Screenshots GAN 1 – GAN 10).
- c. *GPRS*: Recipients have the ability to drawdown their funds electronically. Therefore, the requesting and logging of funds are processed electronically between the Treasury Department and OJP's database (Attachment: gprsuserguide.pdf, page 11-13 of guide/14-16 of PDF).
- d. *Programmatic Progress (to include the collection of performance measures) and Subaward Reports*: OJP and OVW applicants are required to report their post-award activities in a variety of programmatic progress and subaward reports through GMS. Some OJJDP and OVC programs statutorily require additional subaward reporting and requests information from grantees beyond what is collected in the Federal Subaward Reporting System (FSRS)³. 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 subaward reports in one system for online review thus reducing the burden of maintaining programmatic progress and subaward reports years after an award. This includes:
 - (1) *Programmatic Progress Reports*: Collects and manages programmatic progress reports within GMS. Although most programmatic progress reports are free-form reports written in paragraph form (typically in Microsoft Word) and attached to GMS, most OJP programs have a standard set of performance measures that each grantee must respond to, in form-based format in GMS as part of their programmatic progress reporting requirements. Additionally there are profile update pages, attachments, and a certification screen recipients must complete in order to submit their progress report in GMS. See (2) *Performance Measures* below, for more details on Performance Measures. (Screenshots PPSR 1 – PPSR 6)

³ The subaward data GMS collects for some OJJDP and OVC programs includes information which is statutorily required for OJJDP and OVC to collect from recipients. Some basic award information GMS collects for these subawards may duplicate information collected in the FFATA Subawardee Reporting System (FSRS). This is because the GMS subaward reporting function was established several years before the development of FSRS. OJP is reviewing the GMS function for potential duplication to determine what changes to GMS may be necessary and the cost associated with such changes.

- (2) *Performance Measures*: OJP collects program data from grant recipients in the form of performance measures, for all grant programs. Examples of performance measures include the number of youth a particular program served within that reporting period and a percentage of reduction in the number of backlogged forensic cases. Each program has the same set of performance measures in which each recipient is required to submit, however; performance measures will differ by program.

While a screenshot of the GMS Performance Measures reporting screen is on PPSR 3 mentioned above, OJP collects performance measures in different ways within GMS and through other tools outside of GMS. For example, OVC uses GMS to collect performance reporting on its Victims of Crime Act (VOCA) Victims Assistance Formula Program. (Screenshots PM OVC Performance Reporting 1 - PM OVC Performance Reporting 5). BJA and OJJDP manage separate performance measurement data collection tools, the Performance Measurement Tool (PMT) and the Data Collection and Technical Assistance Tool (DCTAT), respectively. (Attachments DCTAT Data Entry Mentoring Example.ppt and PMT Data Entry Drug Court Example.ppt). These tools provide the means for staff to collect data in a consistent manner across all types of OJP federally-funded programs. In some cases, it allows for quick and efficient data analysis on established program goals or objectives. Performance measurement data are used by management to inform program decisions that may affect funding, by internal staff to respond to various Congressional inquiries and Freedom of Information Act requests, and by recipients to enhance and monitor program operations.

- (3) *Subaward Reports*: Collects and manages programmatic subaward progress reports. Some OJJDP and OVC programs are statutorily required to provide subaward information beyond what is collected in FSRS. GMS collects responses to program-specific questions regarding subaward recipients in a form-based format. (Screenshots PPSR OVC Sub 1-7, OJJDP PPSR JABG Sub 1 – 5, OJJDP PPSR Title II Sub 1 – 4, OJJDP PPSR TITLE V Sub 1 – 4, OJJDP PPSR EUDL Sub 1 – 4)
- e. *Closeouts*: With the development and implementation of the web-based closeout module, OJP and OVW grantees are now required to close 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. GANs, Progress Reports) seamlessly. There is a minimal amount of set closeout fields all grantees must complete in order to submit a closeout in GMS. These include: Financial Reconciliation, Programmatic Requirements, and a Certification screen. (Screenshots CO 1- CO 3). GMS pulls completed grant requirements onto one screen for the grantee to view the remaining incomplete requirements, which must be addressed prior to successfully closing out a grant.

The use of information technology and a web-based system greatly assists all grantees 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

Information requested from applicants and grantees is specific to OJP and OVW grant programs and would not otherwise be collected by other entities. GMS allows grantees and OJP grant managers the ability to verify and certify the information and avoid reentry of data.

5. Methods to Minimize 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, OVW, and in come cases, COPS from carrying out its mission to solicit applications and award grants for criminal and juvenile justice and victim assistance programs as well as to conduct proper oversight and statutorily required post monitoring of awards.

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 GAN requests. Certain requests may often include materials such as Memorandums of Understanding or singularly unique items such as Letters of Support, which are unique to the 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

OJP published notices in the Federal Register requesting comments for a period of 60 days on June, 18, 2012, (77 FR 36294) and 30 days on August 22, 2012 (77 FR 50719). No public comments were 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 below



11. Justification for Sensitive Questions

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

12. Estimate of Hourly Burden on Respondents.

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

<u>Module</u>	<u>DOJ Components</u>	<u>Avg. Yearly Hours Spent Per Respondent</u>	<u>FY 2011 Number of Respondents</u>	<u>Hourly Burden</u>
Online Application:				
Application Information Not Collected on SF 424	OJP, OVW and COPS ⁴	.15	15,604	2,341
Peer Review	OJP and OVW ⁵	1	1,414	1,414
Active Awards:				
Reports(/progress/subaward/performance measures - GMS)				
<i>Progress Reports</i>	OJP and	1	36,341	36,341

⁴ To date, the only COPS applications which are solicited through GMS are for the Consolidated Tribal Assistance Solicitation (CTAS), which is a DOJ-wide solicitation. Once the applications are received in GMS, OJP transfers them to the COPS Management System (CMS). Once the COPS Office makes its CTAS awards in CMS, they provide final decisions to OJP via spreadsheet, and OJP updates GMS with award information on the COPS Office applications. Since this represents a minimal number of applications received, which are not processed in GMS, we did not include COPS Office in this part of the collection.

⁵ OJP uses the GMS peer review module for competitive discretionary programs. OVW uses the Peer Review module for a limited number, but not all of their competitive discretionary programs. [COPS only uses the GMS Peer Review module for the CTAS program.](#)

	OVW			
<i>Subaward Reports</i>	OJJDP and OVC	1	7,616	7,616
<i>Performance Measures (GMS)</i>	OJP and OVW	12	3,158	37,896
<i>BJA Performance Measurement Tool (PMT)</i>	BJA	12	7,696	92,352
<i>OJJDP Data Collection and Training and Technical Assistance Tool (DCTAT)</i>	OJJDP	12	1,472	17,664
OVC Victim Compensation Performance Measures	OVC	16	53	848
OVC Victim assistance Performance Measures	OVC	252	56	14112
Grant Adjustments (GANS)	OJP and OVW	.5	18,274	9,137
GPRS	OJP, OVW, and COPS	.15	13,652	2,048
Closeout	OJP and OVW	.25	4,760	1,190
Total			109,987	207,999

13. Estimate of Cost Burden for Respondents

OJP estimates that using GMS imposes minimal costs on respondents. GMS is web-based and requires internet access. Respondents' time to prepare and submit information is represented in burden hours captured in item 12. For those respondents that do not have internet access, public internet access can be used (e.g., public libraries, facilities offering free internet access). The GMS incurs no special fees from respondents. The use of an automated system also yields cost savings to respondents as the effort and cost 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 12,326 active grant awards within GMS, and federal government employees spend an average of 22 hours annually doing work on each active award within GMS, GPRS, PMT and DCTAT combined (does not include grants management work done outside of these systems). There are approximately 15,604 new applications each year and federal

government employees spend an average of 7 hours a year processing each application within GMS (does not include work done outside of GMS).

12,326 active awards	X	22 hours	=	271,172	annual hours
15,604 new applications	X	7 hours	=	<u>109,228</u>	annual hours
				380,400	total annual hours spent

The estimated hourly rate for an OJP employee including benefits is \$42.66.

380,400 hours	X	\$42.66	=	\$16,227,864
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Personnel and Benefits	\$16,227,864
Operations & Maintenance ⁶	<u>\$ 4,537,111</u>
Total Cost to the Federal Government	\$20,764,975

15. Reason for Change in Burden

The decrease in burden hours, since the previous OMB submission, is a result of removing burden hours associated with already OMB-approved data collection submissions. For example, OJP included in the previous OMB submission hours for completed the SF 424, 425 and SF-LLL. These forms have OMB approval for the appropriate burden hours, and therefore OJP was inadvertently double counting burden hours. Additionally, DOJ reporting policies, especially around conference cost reporting, have changed, and are no longer being collected through GMS. Burden hours originally counted for this type of reporting have been removed from this OMB submission. Finally, OJP removed burden hours erroneously included in previous submissions, which were not covered by the Paperwork Reduction Act (PRA), but were incorrectly accounted for. For example, burden hours were removed for monitoring activities, for which there is no burden on applicants as work takes place primarily on the internal side of GMS⁷.

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. Certification for Paperwork Reduction Act Submission

OJP has no exceptions to the certification statement.

⁶ Operations and Maintenance includes costs associated with repairing bugs, security maintenance patches, and performing routine actions to keep GMS, GPRS, DCTAT and PMT in working order, or to prevent issues from occurring.

⁷ After a site visit or desk review, if OJP identifies issues for resolution for a grantee, there is minimal interaction the grantee takes in GMS and is different for each grantee depending on the issues identified. Therefore; the actions they do take are not covered under the PRA.

B. Collection of Information Employing Statistical Methods

OJP does not collect information employing statistical methods.