

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 (the SMART Office). 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 (the COPS Office) for programs carried out collaboratively with OJP and OVW. Functionality of GMS includes online application submission; peer review; and grant award and award management which includes: award notification and acceptance, grant adjustment notices (GAN); draw down of funds (via the Grant Payment Request System (GPRS)); post-award programmatic progress reports, special reports financial reports, performance measures, and subaward reports; closeouts and compliance.

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, and provides automated support throughout the grant lifecycle. GMS is integrated with Grants.gov to provide one stop searching and applying for OJP and OVW grants. OJP, OVW, and the COPS Office grant recipients can request payments online using the GPRS system. Additionally, this collection includes various tools used by some offices to support streamlined and efficient progress, special, and subaward reporting and collection of performance measures.

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 the COPS Office use Grants.gov to post competitive discretionary solicitations announcing to the public that grant funding is available. Through its interface with Grants.gov, GMS receives applications for processing from OJP and OVW.

GMS receives and processes grant applications for noncompetitive grants (e.g., formula or block grants). OJP, OVW, and in limited cases for the COPS Office, for programs carried out collaboratively with OJP, use GMS to post noncompetitive solicitations announcing that grant funding is available. GMS generates award documents for all successful competitive and noncompetitive applications. Post grant award activities include award notification and acceptance, grant adjustments; grant drawdown of funds; grant monitoring; financial, programmatic, special, and subaward reporting; collection of performance measures; closeout; and record maintenance of grant information files. In 2011, GMS was sanctioned as the OJP official file of record by the National Archive and Records Administration.

It is important to note that award acceptance, grant monitoring, and financial reporting are not included in this submission. There is no burden to the public within the GMS award acceptance¹ module or the grant monitoring module². Financial reporting data collected on SF 425 is currently approved under OMB Control Number 0348-0061.

¹ In order to accept an award, the recipient must download the award package, manually sign, and submit back to OJP and OVW. No actions are actually taken in the system.

² 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.

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 the COPS Office 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 the COPS Office 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 award. Many of the award application data collections already have OMB approval via the Grants.gov system³. This submission does not duplicate burden hours for any collections which are presently covered in the Grants.gov system and other OMB approved forms (e.g. SF-424, SF-425, etc.) This submission does however, fold in several other OJP forms under other OMB Collections (referenced below). These forms have been streamlined and automated in GMS, and burden hours were double counted in the past. Streamlining, automating, and including these forms into this larger OMB Collection helps reduce the overall burden hours for those prior OMB Collections. Electronic collections of information for this submission include:

- a. *Online Application*⁴: Applicants complete the SF-424 form online through a collection means that emulate and repeat the same features and questions that

³ 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), and Federal Financial Report (SF-425).

⁴ 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 a program narrative, budget detail worksheet, Financial Management and System of Internal Controls Questionnaire, and project abstract, etc. 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.

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; we are accounting for the noncompetitive applicants who apply through GMS directly. Additionally, there are screens in GMS which collect standard information from all 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. (Online Application.pdf)
 - (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. (Peer Review.pdf)
- b. *Grant Adjustment Notice (GAN)*: All necessary changes to awards are made through the online system which automatically updates their information in the financial system as well. 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. (GANs.pdf).
 - c. *GPRS*: Provides recipients the ability to drawdown funds electronically. Therefore, the requesting and logging of funds are processed electronically between the Treasury Department and OJP's database (Attachment: Page 11-13 of the gprsuserguide.pdf, and page14-16 gprsidentityaccess.pdf).
 - d. *GMS 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, and performance measures, through GMS. Some OJJDP programs statutorily require additional subaward reporting and requests information from grantees beyond what is collected in the Federal Subaward Reporting System (FSRS)⁵. 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

⁵ The subaward data GMS collects for some OJJDP programs includes information which is statutorily required for OJJDP 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.

maintaining programmatic progress and subaward reports years after an award. This includes:

- (1) *Programmatic Progress and Special Reports, and Performance Measures (GMS)*: Collects and manages programmatic progress reports within GMS. GMS also has the ability to collect additional reports or deliverable documentation as required by the grant program. Those that fall outside the required progress reporting period are considered special reports. Although most programmatic progress and special 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 reports in GMS. See (2) *Performance Measures* below, for more details on Performance Measures. (Progress Reports.pdf)

An example of a special report collected via upload to GMS is the NIJ Grant-Sponsored Research Web Submittal Form. This is a web-based tool that NIJ grantees can use to submit documents pertaining to their NIJ-funded research (conference papers, presentations, reports, journal article citations, etc.) after their grant period of performance has expired. (NIJ Research Web Form.pdf)

Additionally, GMS collects OVC information for their Crime Victim Compensation State Certification Form⁶. This is used to detail states victim compensation allocations, payment information, and certification. (OVC VCC Form.pdf)

- (2) *Performance Measures (non-GMS)*: 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 “The 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 be differ by program.

While a screenshot of the GMS Performance Measures reporting screen is in the Progress Reports screenshots mentioned above, OJP also collects performance measures through other tools outside of GMS. For example, BJA, OVC, and OJJDP manage separate performance measurement data collection tools, the BJA Performance Measurement Tool (BJA PMT), the OVC Performance Management Tool (OVC PMT), and the Data Collection and Technical Assistance Tool (DCTAT), respectively. These tools provide the means for

⁶ The OVC Crime Victim Compensation State Certification Form was previously under the OMB Collection 1121-0170. By inclusion of this information in this OMB Collection, the burden hours are reduced and eliminates the need for the prior collection.

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. (Attachments: PMT Data Entry Drug Court Example.ppt, OVC Victim Compensation Report.pdf, OVC Victim Assistance Report.pdf, OVC Subgrant Award Report.pdf⁷, and DCTAT Data Entry Mentoring Example.ppt)

- (3) *Subaward Reports*: Collects and manages programmatic subaward progress reports. Some OJJDP 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. (OJJDP Subaward Reports.ppt)
- 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, and Financial 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. 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. (Closeouts.pdf).

The submission being submitted 07/2018 also adds Compliance Monitoring Tool (CMT). CMT is a GMS module that is used by States to submit data to OJJDP on an annual basis. The areas of information collected are a direct reflection of the OJJDP Act and the obligations agreed to in the solicitation regarding their compliance.

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/>.

⁷ The OVC PMT consolidated three reports into one system. The Victim Compensation Grant Program State Performance Report was previously OMB Collection 1121-0114, The Victim Assistance Grant Program State Performance Reports was previously OMB Collection 1121-0115. And, the Subgrant Award Report was previously the OMB Collection 1121-0142. By inclusion of these three collections into the OVC PMT, this eliminates the need for the prior three collections.

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

“OJP has, and continues to, assess the burden of the requirements on small businesses and makes every effort to minimize additional burdens. The information requested is the minimum amount required to meet program requirements. It cannot be reduced any further for small businesses or entities without compromising the program requirements. Although some grantees may be considered a small business, they are required to deliver the same program benefits and perform the same functions as any other grantee, in order to meet the program requirements. Thus, they are required to maintain the same kinds of information on file.

The impact of the GMS system to small business and other small sized entities is the benefit of, and simple 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 some 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 2015 Number of Respondents</u>	<u>Hourly Burden</u>
Application Information	OJP, OVW and COPS ⁸	1	12,176	12,176
Peer Review	OJP and OVW ⁹	4	3,947	15,788
Reports				
<i>Progress and Special Reports, and Performance Measures (GMS)</i>	OJP and OVW	3	16,286	48,858
<i>Subaward Reports</i>	OJJDP	1	356	356
<i>BJA Performance Measurement Tool</i>	BJA	5	15,361	76,805

⁸ To date, the only COPS Office 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 Office system, NextGen. Once the COPS Office makes its CTAS awards in NextGen, 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.

⁹ 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. The COPS Office only uses the GMS Peer Review module for the CTAS program.

<i>(PMT)</i>				
<i>OJJDP Data Collection and Training and Technical Assistance Tool (DCTAT)</i>	OJJDP	9	791	7,119
<i>OVC Performance Measurement Tool*</i>	OVC	4	289	1,156
<i>NIJ Research Web Form*</i>	NIJ	.17	200	33
<i>OVC Victim Compensation State Certification Form*</i>	OVC	1	53	53
Grant Adjustments (GANS)	OJP and OVW	.5	16,059	8,030
GPRS	OJP, OVW, and COPS	.15	62,835	9,425
Closeout	OJP and OVW	.5	4,547	2,274
CMT	OJJDP	1	56	56
Total		30.32	132,956	182,128

* New Modules since last submission

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 8,812 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, BJA PMT, OVC PMT and DCTAT combined (does not include grants management work done outside of these systems). There are approximately 9,143 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).

8,812 active awards	X	22 hours	=	193,864	annual hours
9,143 new applications	X	7 hours	=	<u>64,001</u>	annual hours
				257,865	total annual hours spent

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

257,865 hours	X	\$42.66 =	\$11,000,521
Personnel and Benefits			\$11,000,521
Operations & Maintenance ¹⁰			<u>\$ 5,281,970</u>
Total Cost to the Federal Government			\$16,282,491

15. Reason for Change in Burden

With this submission the burden increased by a small amount as a result of adding an additional module for Compliance Monitoring Tool (CMT). CMT is the instrument used by the states to submit data to OJJDP on an annual basis. The areas of information collected are a direct reflection of OJJDP Act and the obligations agreed to in the solicitation regarding their compliance.

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 are prepared to display all expiration dates.

18. Certification for Paperwork Reduction Act Submission

OJP has no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

OJP does not collect information employing statistical methods.

¹⁰ 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.