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

Supporting Statement
JustGrants System

A.   Justification

1.   <u>Necessity of Information Collection</u>

The U.S. Department of Justice (DOJ), Office of Justice Programs (OJP) provides federal leadership, grants, training, technical assistance and other resources to improve the nation's capacity to prevent and reduce crime, assist victims and enhance the rule of law by strengthening the criminal and juvenile justice systems. OJP is composed six program offices that support state and local crime-fighting efforts, fund thousands of victim service programs, help communities manage sex offenders, address the needs of youth in the system and children in danger, and provide vital research and data. The six program offices are 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).

DOJ has implemented the guidance of [2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards*](), which sets out various cross-cutting grant administration requirements, in 2 C.F.R. part 2800. Additionally, OJP, through the Office of Audit, Assessment, and Management (OAAM) is required to implement the statutory requirements to establish and maintain, in consultation with the Office of the Chief Information Officer (OCIO), a modern, automated system for management all information relating to grants, as outlined in 34 U.S.C. § 10109(g). Covered programs include those of DOJ's grant making components, OJP, the Office on Violence Against Women (OVW), and the Office of Community Oriented Policing (the COPS Office). The collection of information represented in this Paperwork Reduction Act submission is necessary for DOJ manage and oversee grants according to applicable laws and regulations.

On October 15, 2020, DOJ's grant making components launched new grants management and payment management systems. To modernize and improve the functionality of the grants management system, the Justice Grants System (JustGrants) replaced OJP and OVW's Grants Management System, as well as the NexGen system used by the COPS Office. At the same time as the launch of JustGrants, DOJ's grant making components all transitioned from using the Grants Payment Request System (GPRS) to using the Department of the Treasury's Automated Standard Application for Payments (ASAP). Functionality of JustGrants includes funding opportunity announcement, online application submission; peer review; and grant award and award management which includes: award notification and acceptance, grant award

modifications (GAM); post-award programmatic progress reports, special reports financial reports, performance measures, and subaward reports; closeouts; and monitoring, audit, and compliance.

2.   Needs and Uses

JustGrants is an end-to-end grants management system that provides applicants and grantees a single location to apply for, and manage funded awards, across all three of DOJ's grant making components. JustGrants facilitates the entirety of the grants management lifecycle for both external applicants and grantees and internal DOJ staff.

It is important to note that this collection does not account for the burden hours already collected under other OMB-approved collections[1], which include Grants.gov, SAM.gov, and ASAP. However, OJP manages the Performance Management Tool (PMT) that collects performance measure data from grantees, which has not yet been built into the JustGrants system. While building PMT functionality is future work already scheduled for JustGrants development, this collection also includes the burden hours and approval for the OJP PMT.

3.   Use of Information Technology

JustGrants allows respondents to fill-out and transmit grant applications and related forms completely electronically. By utilizing information technology, JustGrants utilizes data throughout the entirety of the grants lifecycle to improve 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 awards. Many of the award application data collections already have OMB approval via the JustGrants system. Ingesting data from previously approve OMB collections helps to streamline and automate services to applicants and grantees, which helps reduce the overall burden hours for the public. Electronic collections of information for this submission include:

> a. *Entity Management*: Allows entities to manage their JustGrants profile online, verify their entity information, manage users, assign roles, and add documents to their library. Then entity profile is largely read-only with entity data that was ingested into JustGrants from SAM.gov. Entities are required to keep their entity information maintained in SAM.gov per applicable laws and regulation; however, some fields in the entity profile are editable. To manage users, entities can invite users into JustGrants to be associated with their organization. This includes entering user first name, last name, email and choosing the applicable roles the user will need from a dropdown. Other options are available to allow entities to select users and associate awards to those users, or remove users from their entities, which are largely selectable

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[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), and Federal Financial Report (SF-425). Any burden hours calculated in Item 12 below, is for the submission step when using JustGrants and not duplicative of the already approved burden hours of these collections.

choices and dropdown menus. A video of the Entity Management functionality in JustGrants can be viewed at https://youtu.be/1h5QBNZNb1o.

b. *Online Application:* Applicants complete and submit the SF-424 form online through Grants.gov (See Footnote 1), which is then ingested into JustGrants for applicants to continue the completion and submission of their applications. The JustGrants online application includes:

- *Project Information:* Includes selectable options, dropdown menus, and fillable fields to identify project information (e.g., project title, start and end dates, requested funding amount).
- *Project Abstract:* Includes a text field to either manually enter, or copy and paste a summary of the proposed project.
- *Proposal Narrative:* Includes the ability to upload a narrative document, and the ability to identify (e.g., selectable options, dropdown menus, and fillable fields) specific goals and objectives for the project.
- *Budget Detail Worksheet*: This includes various selectable options, dropdown menus, and fillable fields to detail out the application budget items (e.g., travel, equipment, supplies) and applicable justification narratives.
- *Attachments*: Attachments can be added to many of the individual application sections or for the application package as a whole. Attachments can be uploaded or by use of the drag and drop feature.
- *Certify and Submit*: This includes selectable options and dropdown menus to confirm the Authorized Signature, review and complete required assurances and certifications, and submit the completed application package.

A video on the Application Submission process, and completing the Budget Detail, can be viewed at https://youtu.be/_56sxZBdEW8 and https://youtu.be/9I4iTR_ROpc, respectively.

All application-related videos can be viewed at: https://justicegrants.usdoj.gov/training/training-application-submission#bqhfjk.

c. *Award Acceptance*: All awards are accepted (or declined) by the grantee electronically. However, entities must register in ASAP (if not already register), before accepting an award in JustGrants. Award acceptance in JustGrants requires that a Financial Manager and a Grant Award Administrator be assigned to the award. This step includes selectable options and dropdown menus to review the award document, applicable award conditions, and other related information. If declining an award, an uploaded justification is required to be attached. A video on the Award Acceptance process can be viewed at https://youtu.be/aYPwUtoyLII.

d. *Peer Review:* Discretionary applications that are required to go through the Merit Review process, will proceed through the JustGrants Peer Review module for evaluation. Peer Reviewers are provided login and registration information to access

JustGrants where they will be assigned to panels and a set of applications to review. Registration requires peer reviewers to complete a user profile screen with dropdown menus and fillable fields. The steps in JustGrants required for Peer Reviewers to complete include selectable options, dropdown menus, and fillable fields required to assess applications, select scores, and provide comments on the application's strengths and weaknesses. Videos on Peer Review experience can be viewed at https://www.ojp.gov/training-and-technical-assistance/peer-review-training.

e. *Grant Award Modifications (GAM):* All necessary changes and updates to awards details are made online, which automatically updates award information in both JustGrants and the DOJ financial system, depending on the type of modification. JustGrants has 3 type of GAMs where the grantee logs into JustGrants, completes a set selectable options, dropdown menus, and fillable fields, and submits the information for approval. Examples of GANs include, Project Period Extensions, Programmatic, and Financial GAMs. Videos on the JustGrants GAM functionality can be viewed at https://justicegrants.usdoj.gov/training/training-grant-award-modifications.

f. *Financial Reporting:* JustGrants utilizes the OMB-approved SF-425 Federal Financial Report to collect award expenditures on a quarterly basis. Pre-populated data is pulled from the award details and entity profile. Grantees are required to complete the remaining expenditure related fields which includes a set selectable options, dropdown menus, and fillable fields, and submits the FFR. A video on how to complete and submit and FFR in JustGrants can be viewed at https://youtu.be/Gp8r4NArw10.

g. *Performance Reporting (including award deliverables, subaward, technical assistance, and compliance monitoring reporting):* All required performance reporting is submitted online for all awards. Performance Reporting includes progress reporting, collecting performance measure data, subaward reporting, compliance monitoring reporting, and review and approval of any additional reporting requirements set out in an award's individual conditions (e.g., award deliverables).

The frequency and types of reporting can be different between programs. Performance reporting requirements are detailed in every funding opportunity announcement and the terms and conditions of an award. Some programs statutorily require additional subaward reporting data from grantees beyond what is collected in the Federal Subaward Reporting System (FSRS)[2]. Similarly, some programs require specific technical assistance and compliance monitoring reporting. These additional types of reporting data are not currently collected in JustGrants (addressed below), but will be phased in during future development of the system.

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[2] Additional statutorily-required subaward data is currently collected in tools not currently available in JustGrants. This is primarily done using the OJP Performance Management Tool (PMT). Additionally, other performance-related data is collected in the BJA Training and Technical Assistance Reporting (TTARP) Tool and the OJJDP Compliance Monitoring Tool (CMT). Until these features can be built into JustGrants, grantees are required to submit the required data in the applicable reporting tool, and upload an auto-generated summary report into the JustGrants Performance Reporting module, in order to satisfy their award reporting requirements.

Regardless of the tool used to collect performance-related data, grantees are required to report their performance reports in JustGrants, which includes an attachment of the reports from any other reporting tool. Pre-populated data is pulled from the award details and entity profile. Performance Reporting in JustGrants includes program-specific questionnaires with selectable options, dropdown menus, and fillable fields. Attachments can be uploaded or by use of the drag and drop feature. A video on how to complete and submit a Performance Report can be viewed at https://youtu.be/1U0VSFddP28.

(1) *Performance Management Tools:* OJP collects additional program data from grant recipients in the form of performance measures, training and technical assistance provided, and compliance monitoring data. The various tools OJP uses to collect this data are the OJP Performance Management Tool (PMT), BJA Technical Assistance Reporting (TTARP) tool, and OJJDP Compliance Monitoring Tool (CMT). Additional reporting in these tools include program-specific questionnaires with selectable options, dropdown menus, and fillable fields. Attachments can be uploaded or by use of the drag and drop feature.

Training materials for these performance reporting-related tools are provided as attachments to this Supporting Statement.

h. *Monitoring*: JustGrants allows grantees to view open desk reviews, audits, and in-depth monitoring cases for their entity. Grantees can also access information on their monitoring visits and any outstanding issues for resolution from previous visits performed before the launch of JustGrants. Currently, there are not actions for grantees to take in the JustGrants monitoring screens, and therefore no burden hours to calculate.

i. *Closeouts:* Closeout of all awards are to be submitted in JustGrants. Paper submissions are no longer accepted. In order to complete a closeout, grantees must submit the final financial, performance, and other reports required under the grant within 120 days after the grant award expires or is terminated. The closeout interface has been built to interact with the other JustGrants modules (e.g. GAMs, 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 JustGrants. Grantees will review to ensure they have submitted a final FFR and final Performance Report, ensured the Financial Reconciliation is complete, addressed any outstanding award conditions, and submitted any additional deliverables required under the award conditions. JustGrants pre-populates completed grant requirements onto one screen for the grantee to view and address any remaining incomplete requirements, which must be addressed prior to successfully closing out a grant. Submitting a closeout includes selectable options, dropdown menus, and fillable fields, and submits the information for approval. Attachments can be uploaded or by use of the drag and drop feature. A video of the JustGrants Closeout features can be viewed at https://youtu.be/BCs0l8fV7R4.

For further description of JustGrants and information and resources to assist DOJ award applicants, grantees, and other stakeholders most effectively register in and use these systems, please visit https://justicegrants.usdoj.gov/.

4.   Efforts to Identify Duplication

One of the core principles in designing JustGrants was to leverage as many shared services as possible, and eliminate duplication. To leverage the source of truth information that gets ingested into JustGrants, the system either pulls data or is integrated with SAM.gov, Grants.gov, and ASAP. DOJ will continue to work with the Grants Quality Service Management Office at the U.S. General Services Administration on any future shared services integrations as JustGrants continues to get developed.

Another core principle in designing JustGrants was to leverage data at it source and pre-populate it throughout the system and the grants lifecycle to improve data accuracy, eliminate duplication, and reduce the burden in use of the system. In many of the modules listed above, pre-populated data is pulled through the entire grantee experience increase the trust in the validity of the data and eliminate the need to re-enter data at every stage of the grants lifecycle.

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

6.   Consequences of Not Conducting or Less Frequent Collection

The non-collection of data or less frequent collection would undermine DOJ compliance with 2 CFR Part 200 (*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*) and its ability to carry out its statutorily prescribed mission to make and oversee grants for criminal and juvenile justice and victim assistance programs, and other programs.

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 GAM 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 August 23, 2021, (86 FR 47158) and 30 days on October 25, 2021 (86 FR 58959). 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 JustGrants sign-in page. The JustGrants Privacy Impact Assessment is available below

ojp_pia_20-1335_ju   JG Login Privacy
stgrants_20210223.p   Notice.pdf
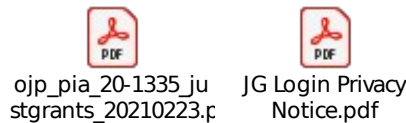
11.   Justification for Sensitive Questions

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

12.   Estimate of Hourly Burden on Respondents.

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

Module	Avg. Yearly Hours Spent Per Respondent	FY 2021 Number of Respondents	Hourly Burden
Entity Management	1	6,226	6,226

Online Applications (See Footnote 1)	4	15,070	60,280
Award Acceptance[3]	1	7,310	7,310
Peer Review[4]	4	3,983	15,932
Grant Award Modifications (GAMs)	1	27,964	27,964
Reports			
Federal Financial Report (FFR) (Submission only - See Footnote 1)	1	32,300	32,300
JustGrants Performance Reporting (including Award deliverable reporting)	2	19,379	38,758
BJA Training and Technical Assistance Reporting Tool	11	143	1,573
OJP Performance Management Tool (to include subaward reporting) for BJA, NIJ, and OVC	9	14,930	134,370
Monitoring	0	19,379	0
Closeout	1	2,025	2,025
OJJDP Compliance Monitoring Tool	4	53	212
Total	**39**	**148,762-**	**326,950**

13. <u>Estimate of Cost Burden for Respondents</u>

OJP estimates that using JustGrants imposes minimal costs on respondents. JustGrants 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 JustGrants 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. <u>Annualized Cost to the Federal Government</u>

Annualized cost is comprised of operations and maintenance costs associated with repairing bugs, security maintenance patches, and performing routine actions to keep JustGrants in working order, or to prevent issues from occurring.

Annualized Cost to the Federal Government: $5,265,932

15. <u>Reason for Change in Burden</u>

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[3] Number of award accepted is based on the number of awards made in FY 2020, since DOJ is still processing FY 2021 awards in JustGrants.

[4] Number of Peer Reviewed applications is based on the number of applications peer-reviewed in FY 2020, since DOJ is still performing FY 2021 peer review in JustGrants.

JustGrants replaced OJP and OVW's Grants Management System, as well as the NexGen system used by the COPS Office, which transitioned all DOJ internal users and all DOJ respondent on to one system. Some of the changes and adjustments to burden is from building NexGen functionality into JustGrants and acquiring those related burden hours. Also, since acquiring the number of respondents that used to respond to NexGen, the JustGrants total number of respondents has increased significantly. Finally, JustGrants was released as a base solution and is still under development. Much of the functionality that would result in the biggest efficiencies and reduction of burden hours are planned for future development. OJP anticipates a reduction in burden hours over the course of future JustGrants development when several streamlined processes and system efficiencies will be released.

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 is 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 in JustGrants employing statistical methods.