Welcome

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Special Conditions

- Special conditions are terms & conditions of the award. By accepting the award, you agree to comply with them.
- All awards will include **standard special conditions.** Important Special Conditions to note:
  - POC and FPOCs - Completion of "OJP financial management and grant administration training" required
  - Subawards - all subawards require federal authorization
- **Special conditions with frequent questions:**
  - Submission of BJA published materials
  - FFATA Reporting Subawards and Executive Compensation
- **Program Specific Special Conditions**
  - SAKI – Withholding of Funds for Completed Inventory
  - NEPA Environmental Assessment
- **Withholding special conditions**
  - Withholding of funds for BJA budget narrative
  - Conditional clearance – available travel funds

Reporting Requirements

- **SF-425 Financial reports**: Completed and submitted in Grant Management System (GMS) quarterly

- **Programmatic reports**: Completed in Performance Management Tool System (PMT) and submitted in GMS. The PMT includes quantitative performance measures (completed and submitted quarterly in PMT) and narrative questions (submitted in GMS semi-annually)

Important Note: Progress Report and Financial Status Report due dates are fixed and cannot be adjusted. Late reports submitted (after the grace period) into GMS will automatically result in a Withhold of Funds placed on the award which will be removed once the Progress Report or Financial Status Report are submitted.

GMS Financial Status Reports SF-425 – Quarterly

Reporting Period	Due Date
January 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30
October 1 – December 31	January 30

Submitted in GMS: https://grants.ojp.usdoj.gov

Progress Reporting Requirements

Quarterly Performance Metric Tool (PMT) Programmatic reports PMT Website https://bjapmt.ojp.gov/	Reporting Period	Due Date	Submitted in:
	January 1 – March 31	April 30	Performance Management Tool (PMT)
	April 1 – June 30	July 30	
	July 1 – September 30	October 30	
	October 1 – December 31	January 30	

Semi-Annual Grants Management System (GMS) Programmatic reports GMS Website https://grants.ojp.usdoj.gov	Submit	Due Date	Submitted in:
	Upload PDF versions of your PMT to the report in GMS	January 30	Grants Management System (GMS)
		July 30	

- Submitted in GMS: https://grants.ojp.usdoj.gov
- For technical assistance, please contact the GMS Helpdesk at 1-888-549-9901 or GMS.helpdesk@usdoj.gov
- Should include an attached PMT report for the appropriate reporting periods

Importance of Performance Reporting

To identify areas of success and potential areas of improvement.
- System improvements, including internal training and technical assistance (TTA) and external messaging

To track activity and progress.
- Informs BJA reviews and decision-making

To understand how funds are being distributed.
- Informs budget, strategic plan, and future funding
- Enables BJA to respond to external requests (e.g., congressional inquiries, media requests)

To comply with the law.
- Government Performance and Results Modernization Act of 2010

Financial Information

- To be allowable under Federal awards; costs must be **reasonable, allocable,** and **necessary** to the project. In addition, they must comply with funding statute requirements.
- DOJ Grants Financial Guide – Please bookmark http://ojp.gov/financialguide/DOJ/index.htm, or download the PDF version http://ojp.gov/financialguide/DOJ/pdfs/2015_DOJ_FinancialGuide.pdf
- DOJ Financial Guide includes references to the rules and policies that are issued by the Office of Management and Budget (OMB).These policies are detailed in uniform (grants) administrative requirements, cost principles, and audit requirements set forth in 2 C.F.R. § 200 and identified as Government-wide common rules applicable to grants and cooperative agreements. More information and links can be found here: http://ojp.gov/financialguide/DOJ/GeneralInformation/index.htm

Financial Management Training and Technical Assistance

- Beginning in fiscal year 2016, OJP implemented requirements for Grants Financial Management Training for all award recipients either in person on online.

- New POCs and FPOCs have 120 calendar days to demonstrate completion of training. If training is not completed within 120 days, the grant manager must submit a GAN to (freeze) hold funds.

- A list of OJP trainings that OJP will consider "OJP financial management and grant administration training" for purposes of this condition is available at http://www.ojp.gov/training/fmts.htm

Grant Adjustment Notice (GAN):

- A GAN is used to request project changes and/or corrections.
- GANs are submitted and approved through GMS. GAN types include:
  - Budget Modifications
  - Change of Scope
  - Project Period
  - Point of Contact Information
  - Removal of Special Conditions
  - Sole Source
  - Costs Requiring Prior Approval
- GANs will not be approved if the grantee is delinquent on financial or programmatic reporting.
- Each GAN goes through numerous levels of approval and should include necessary support documents. <u>It can take up to a month to get approval</u>.
- Once OJP makes a decision regarding the proposed change, the grantee is notified by GMS via e-mail.

BJA Compliance Monitoring

- BJA will monitor grant recipients to ensure they are:
  - Doing what was proposed and approved;
  - Meeting programmatic, administrative, and fiscal requirements;
  - Identifying and resolving problems and/or issues; and
  - Receiving needed training and guidance.
- Aspects of grant monitoring include:
  - Progress reports – submitted semi-annually
  - Desk Review – conducted annually
  - Enhanced Programmatic Desk Review or Site Visit – may be conducted at any point in the grant project period if selected by program office or OCFO

Common areas of noncompliance

- FFATA Reporting
  - Prime recipients of awards $25,000 or more, must report on any first-tier subawards and subcontracts of $25,000 or more no later than end of the month following subaward.
  - To help navigate the submission process, user guides, FAQs, and online demos are available at www.fsrs.gov/resources.
  - For more information about FFATA, see: http://ojp.gov/funding/Apply/Resources/FFATASubawardReportingWebcast.wmv
- FPOC/POC Financial Management and Grant Administration Training – must be completed within 120 days of the award. Noncompliance will result in your funds being frozen.
- Subaward Management and Monitoring – grantee must maintain written policies and procedures for its subrecipient award process to ensure it meets the requirements as laid out in 2 C.F.R. § 200.303 and 200.331. These policies and procedures should have specific sections around pre-award and post-award responsibilities.

Subawards and Procurement Contracts under OJP Awards

- You (grantee) must determine if your passthrough funds are considered subawards or procurement contracts.

- There are significant differences between a subaward and a procurement contract, including how those entities are selected and monitored.

- OJP has developed the following guidance documents to help clarify the differences between subawards and procurement contracts under an OJP award and outline the compliance and reporting requirements for each. This information can be accessed online at https://ojp.gov/training/subawards-procurement.htm

- Subawards under OJP Awards and Procurement Contracts under Awards: A Toolkit for OJP Recipients.

- Checklist to Determine Subrecipient or Contractor Classification.

- Sole Source Justification Fact Sheet and Sole Source Review Checklist

Subawards Management and Monitoring Overview

- The grantee should maintain **written policies and procedures** for its subrecipient award process to ensure it meets the requirements as laid out in 2 C.F.R. § 200.303 and 200.331. These policies and procedures should have specific sections around pre-award and post-award responsibilities.

- At minimum the pre-award procedures should include the following: requirement to ensure that the proposed subrecipient is not suspended or debarred by the federal government; process to ensure that the subrecipient agreement includes the required data elements; and process to ensure that applicable federal special conditions pass down to the subrecipient award.

- At minimum the post-award procedures should contain a risk –based approach for selecting subrecipients to monitor, a process for on-site monitoring; a monitoring checklist that satisfies administrative, financial, and programmatic elements; process for documenting findings in a report; and procedures for follow-up on issues for resolution.

- The grantee's subrecipient policies and procedures should include a process for closing out subawards.

Procurement Overview

- All procurement transactions must be conducted in a manner to provide the maximum extent practical, open and free competition

- Grantees should follow their local/state guidelines for procurement
  - When deciding the specific processes for bids, timelines, and how the scope of those documents you should use your local/state guidelines as long as these do not contradict Federal regulations on procurement

- There are certain circumstances that may call for other than full and open competition. These circumstances may result in "sole sourcing" contracting.
  - To request advance approval from OJP to use a noncompetitive approach for a procurement contract that would exceed the simplified acquisition threshold ($250,000), the recipient must submit a justification for use of a noncompetitive approach in a form of a GAN through GMS.
  - Grantees may make the initial determination that competition is not feasible if one of the following circumstances exists:
    1. The item of service is available only from a single source.
    2. The public exigency or emergency for the requirement will not permit a delay resulting from a competitive solicitation.
    3. After solicitation of a number of sources, competition is considered inadequate.
  - Please note: any sole source contracting that does not exceed the $250,000 threshold for approval should still follow the OJP financial guide requirements

Procurement Documentation

- Documentation
  - It is crucial that you maintain all procurement related documentation for BJA review.
  - Regardless of the need for approval, all procurement decisions should be documented and evidence maintained for review.
  - What was sent out, what was received, how the decision was made.
  - Each of the procurement contracts or subawards should have their own subfolder with all of the relevant documentation – just like the main grant file of your award.
- Consultant Rates
  - $650 per day maximum rate.

Grant Closeout

- Standard Closeout:
  - Submitted within 90 calendar days after the grant end date.
  - All administrative, programmatic, and financial requirements have been met.
  - All expenses must be obligated by the last day of the project period.
  - GMS will begin notifying the grantee 60 days prior to the grant end date.
- Administrative Closeout:
  - On the 91st day after the grant end date, GMS will automatically freeze funds, initiate an administrative closeout and notify the grantee.
  - The grantee is unwilling/non-compliant or unable to complete closeout requirements

Additional Resources

- BJA SAKI Website: https://www.bja.gov/ProgramDetails.aspx?Program_ID=117

- SAKI TTA Website: https://sakitta.org/

- **OCFO** Customer Service Center: 1-800-458-0786 ask.ocfo@usdoj.gov

- Grant Payment Request System (GPRS) User Guide: http://www.ojp.gov/about/pdfs/gprsuserguide.pdf

- Grants Management System (GMS): https://grants.ojp.usdoj.gov/

- GMS Training Resources: http://ojp.gov/training/gmstraining.htm

- GMS Training Tool: http://www.ojp.gov/gmscbt/

- GMS Help Desk: 202-514-2024 (option 3)

- DOJ Grants Financial Guide: http://ojp.gov/financialguide/DOJ/index.htm

- DOJ Grants Financial Management Training Site: http://gfm.webfirst.com/

- BJA Performance Measurement Tool (PMT): https://bjapmt.ojp.gov ,

- BJA PMT help desk bjapmt@usdoj.gov or 1-888-252-6867