



**STREAMLINING OF ADMINISTRATIVE
ACTIVITIES AND FEDERAL FINANCIAL
ASSISTANCE FUNCTIONS IN THE OFFICE OF
JUSTICE PROGRAMS AND THE OFFICE OF
COMMUNITY ORIENTED POLICING SERVICES**

U.S. Department of Justice
Office of the Inspector General
Audit Division

Audit Report 03-27
August 2003

STREAMLINING OF ADMINISTRATIVE ACTIVITIES AND FEDERAL FINANCIAL ASSISTANCE FUNCTIONS IN THE OFFICE OF JUSTICE PROGRAMS AND THE OFFICE OF COMMUNITY ORIENTED POLICING SERVICES

EXECUTIVE SUMMARY

Within the Department of Justice (Department), the responsibility for managing Federal financial assistance programs is split primarily between the Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS).¹ The number and dollar value of Federal financial assistance programs managed by the Department have grown substantially over the last several years. The two offices awarded grants for about 96 programs and \$5 billion for fiscal year (FY) 2002. The objective of our audit was to identify activities and functions that could be streamlined to increase operational efficiency within OJP and the COPS Office.

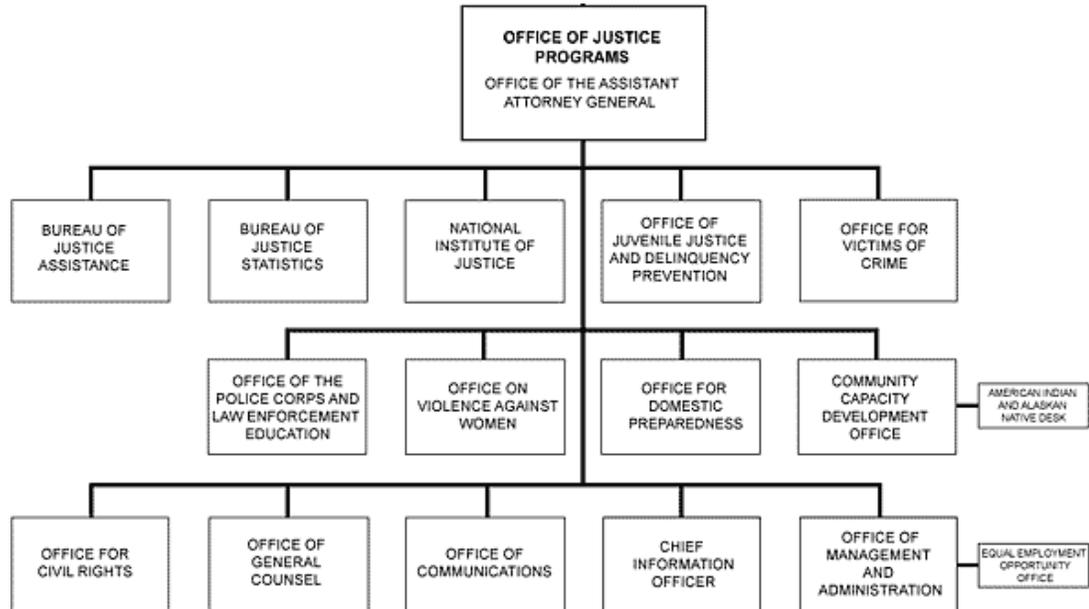
The Office of Justice Programs

Since its establishment in 1984, OJP has been tasked with providing grants to improve the nation's capacity to prevent and control crime, improve the criminal and juvenile justice systems, increase knowledge about crime and related issues, and assist crime victims. For FY 2003, OJP was authorized 729 full-time equivalent (FTE) positions and had a budget of about \$4.2 billion.² OJP is headed by an Assistant Attorney General and has recently undergone a reorganization of its structure and operations. According to OJP, the purpose of the reorganization is to become more effective, reduce duplication, and improve the delivery of services to grantees. OJP's current organization structure is shown in the following chart.

¹ Federal financial assistance is provided through various means such as grants, cooperative agreements, and reimbursable agreements. The terms are used interchangeably throughout this report.

² At the time of our audit, OJP was under a hiring freeze and as of February 28, 2003, had 747 staff on board. This number included 47 staff for OJP's Office of Domestic Preparedness that was transferred to the Department of Homeland Security effective March 1, 2003.

OJP's Organization Structure³



Source: OJP

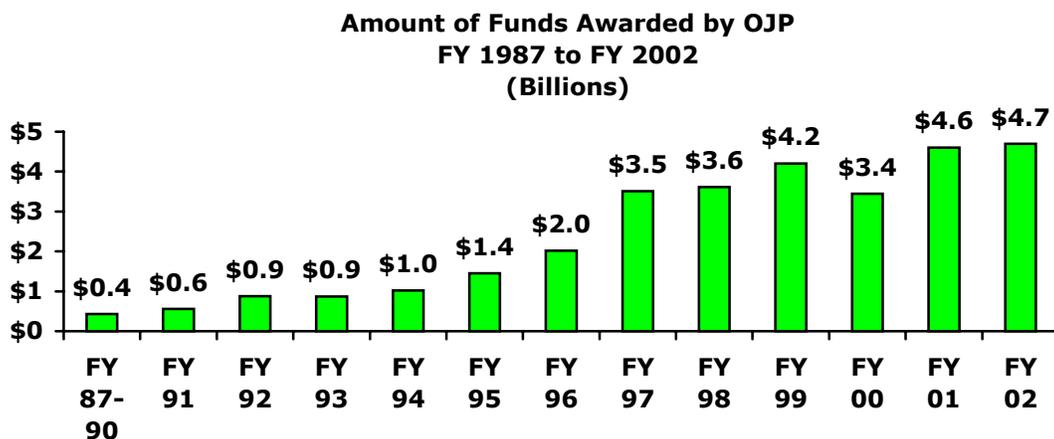
The major changes under OJP's reorganization were:

- Two of the six program offices (Drug Courts Program Office, and Corrections Program Office) were moved to the Bureau of Justice Assistance.
- One of the six program offices (Executive Office for Weed and Seed) was moved to a new office called the Community Capacity Development Office.
- Four of the eight support offices (Office of the Comptroller, Equal Employment Opportunity Office, Office of Budget and Management Services, and Office of Administration except the Information Resources Management Division) were combined into a new Office of Management and Administration.
- One of the eight support offices (American Indian and Alaskan Native Office) was moved to the new Community Capacity Development Office.

³ For a description of OJP's bureaus, program offices, and support offices, see Appendix 1.

- The Information Resources Management Division of the Office of Administration was moved under the new Chief Information Officer.
- The Office of Congressional and Public Affairs was renamed the Office of Communications.
- The Violence Against Women Office was renamed the Office on Violence Against Women.

OJP's funding programs are divided into two main categories: formula grants and discretionary grants. Formula grants are awarded to State and local governments based on a predetermined formula using, for example, a jurisdiction's crime rate, population, or other factors. States are generally required to pass a significant portion of formula awards through to local agencies and organizations in the form of subgrants. Discretionary grants are awarded on a competitive basis to public and private agencies and private non-profit organizations. However, certain discretionary programs, such as funding to the Boys & Girls Clubs of America and the National Crime Prevention Council, are awarded on a noncompetitive basis, consistent with congressional earmarks. As shown in the following graph, OJP's bureaus and program offices awarded more than \$31 billion in Federal financial assistance for FYs 1987 through 2002.



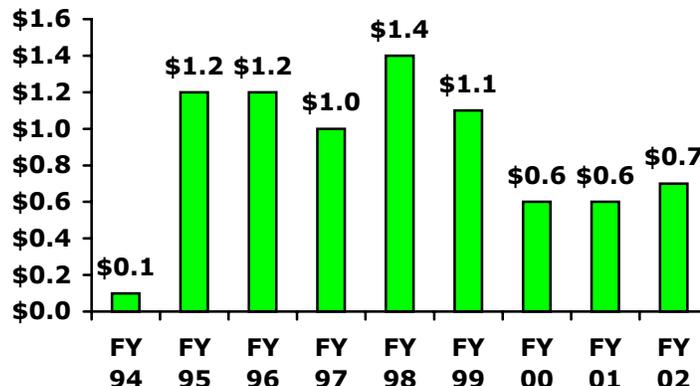
Source: OJP

The Office of Community Oriented Policing Services

The COPS Office was established in 1994 as a result of the Violent Crime Control and Law Enforcement Act of 1994 (1994 Crime Act). The single largest component of the 1994 Crime Act was Title I – the Public Safety Partnership and Community Policing Act of 1994. The 1994 Crime Act authorized \$8.8 billion over 6 years to fund the addition of community oriented policing officers and advance community policing nationwide. The

COPS program was extended beyond FY 2000 by the FY 2001 Commerce-Justice-State Appropriations Bill. For FY 2003, the COPS Office was authorized 235 FTE positions and had a budget of about \$923 million.⁴ As shown in the following graph, in FYs 1994 through 2002, the COPS Office awarded about \$8 billion in grants in support of its mission to increase community policing.⁵

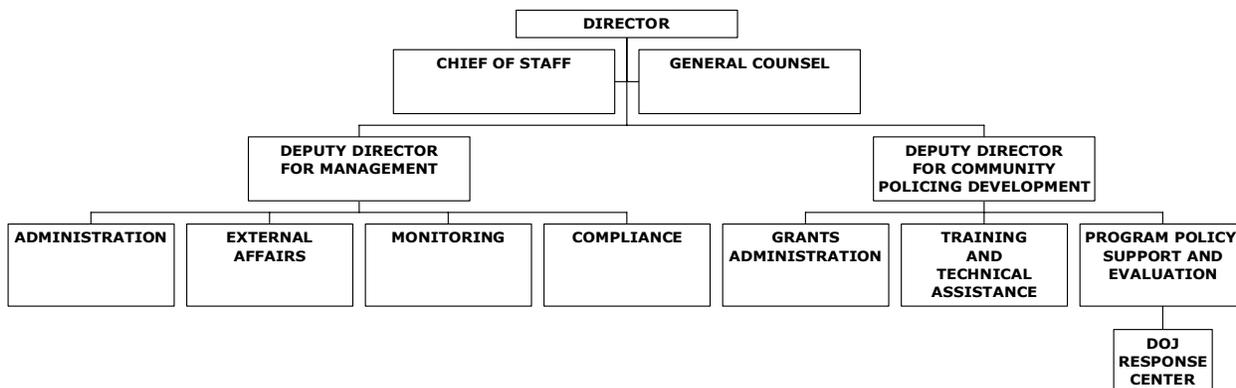
**Amount of Funds Awarded by COPS
FY 1994 to FY 2002
(Billions)**



Source: COPS Management System

To implement the COPS program, in FY 1994 the Attorney General created the COPS Office as a separate office from OJP. The COPS Office is headed by a Director appointed by the Attorney General. At the time of our audit, it operated under the following organization structure.

The COPS Office's Organization Structure



Source: COPS Office

⁴ At the time of our audit, the COPS Office was under a hiring freeze and as of February 28, 2003, had 155 staff on board.

⁵ The FY 1994 total was \$148 million for Police Hiring Supplement grants awarded by OJP but administered by the COPS Office beginning in FY 1994. The FY 1995 total includes \$187 million for the Phase I COPS grants awarded by OJP for the COPS Office.

On October 25, 2002, the COPS Office submitted a proposal to the Acting Assistant Attorney General for Administration to reorganize the COPS Office. Under the proposed reorganization, the COPS Office would have an Office of General Counsel and three deputy directorates that report to the Director. The COPS Office would have eight divisions, instead of the current seven, plus the response center. On February 11, 2003, the Attorney General approved the COPS Office's revised organization structure. As of March 19, 2003, the COPS Office's reorganization was pending approval by the Office of Management and Budget (OMB).

Audit Results

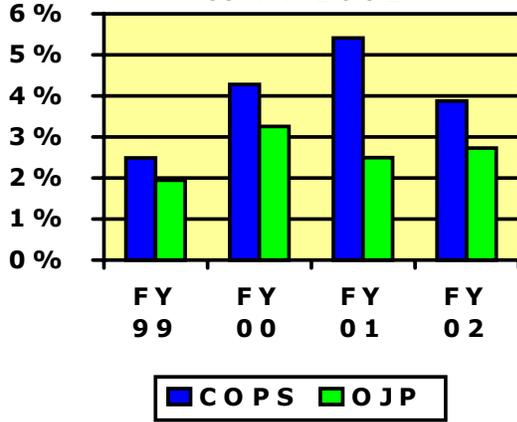
Our audit determined that Federal financial assistance programs in the Department are fragmented, resulting in reduced efficiency and higher costs to award and administer Federal financial assistance funds to State and local agencies. As described below, we made findings in the following areas: structural overlap between the COPS Office and OJP, overlap in grant programs between the COPS Office and OJP, lack of on-line grant application processing in the COPS Office, overlap in OJP's organization structure, and inefficiencies in OJP's automated grant management systems.

Structural Overlap Between the COPS Office and OJP

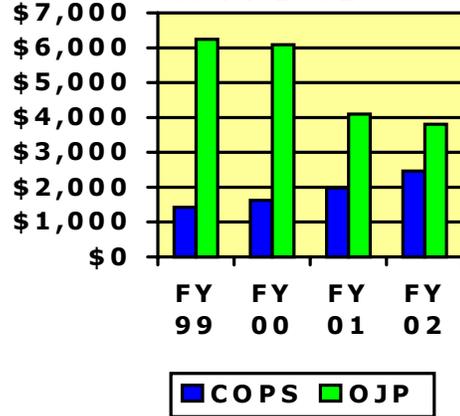
The Department's major financial assistance programs are split between OJP and the COPS Office, with both agencies awarding and administering grants to State and local law enforcement agencies that are sometimes for similar purposes. As illustrated in the following charts, from FY 1999 to FY 2002, the COPS Office's management and administration (M&A) costs per program dollar have been higher than OJP's, while COPS's M&A costs per grant administered have been lower than OJP's. However, COPS's costs per grant administered have been increasing while OJP's costs have been decreasing. If the trend continues, the COPS Office will spend more M&A costs per grants administered than OJP in FY 2004.

Comparison of Actual M&A Costs for COPS and OJP

**Actual M&A Costs Per Program
Dollar From FY 1999
to FY 2002**



**Actual M&A Costs Per Grant
Administered From FY 1999
to FY 2002**



Source: Office of the Inspector General (OIG) Analyses of Actual Cost and Grant Award Data

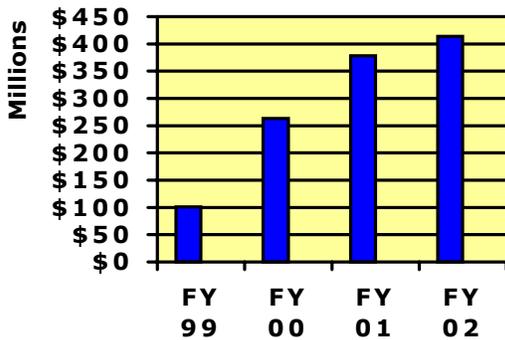
The COPS Office's M&A costs per grant administered have been increasing because the grants administered by the COPS Office have been significantly reduced in recent years, but the COPS Office's personnel costs have not decreased correspondingly. OJP's M&A costs per grants administered have been decreasing because OJP has significantly increased its grants administered in recent years while keeping its personnel costs relatively constant.⁶

The COPS Office transfers significant portions of its appropriated funds to OJP to administer. Although these funds (known as pass-through funds) are appropriated in the COPS Office's budget, the COPS Office transfers the funds to OJP and, in most cases, OJP assumes full responsibility for management and administration of the funds. The COPS Office funds are passed through to OJP in various ways. Most of the funds passed through to OJP are mandated by Congress in the COPS Office's annual appropriations language, such as for the Police Corps program in FY 2002. The authorizing language in the COPS Office's approved FY 2002 budget provided that the Police Corps funds totaling about \$14.4 million would be transferred to OJP to administer. In addition, the COPS Office passes funds to OJP through discretionary pass-throughs that occur when the COPS Office and OJP agree that

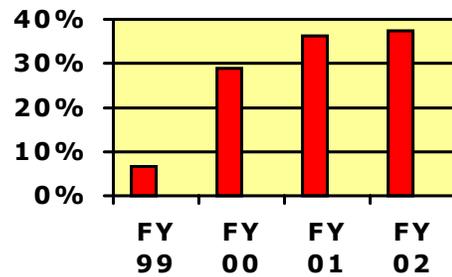
⁶ The analyses comparing the COPS Office's M&A costs to OJP's M&A costs support that the COPS Office's M&A costs per program dollar have been higher than OJP's and that the COPS Office's M&A costs per grant administered are steadily increasing while OJP's M&A costs are decreasing. The analyses were macro analyses that do not take into account other variables that could affect each office's cost to administer grants such as hiring freezes and unexpected program changes.

certain funds in the COPS Office’s budget would be either best managed by OJP or best managed jointly, such as for the jointly managed Comprehensive Indian Resources for Community and Law Enforcement (CIRCLE) program in FY 2001. In FY 2001, the COPS Office passed through \$2 million to OJP for the CIRCLE program. The COPS Office also passes funds to OJP through earmarks that are legislative directives in the appropriations laws that dictate how to spend certain funds appropriated within larger funding programs. According to COPS officials, these funds are usually to continue projects previously administered by OJP or for programs that specifically fit within an existing OJP program. One such continuation project was the Safe Schools Initiative (SSI) in FY 2002. In FY 2002, COPS passed through \$9,531,000 of earmarked funds to OJP for the SSI. As illustrated below, our audit determined that since FY 1999, the amount of funds that the COPS Office has passed through to OJP has steadily increased and reached almost 40 percent of the COPS Office’s total budget by FY 2002.

COPS Funds Passed Through to OJP From FY 1999 to FY 2002



Percent of COPS Budget Passed Through to OJP From FY 1999 to FY 2002



Source: OIG Analyses of Budget Data

In addition to pass-throughs, the COPS Office has also entered into reimbursable agreements each year for OJP to perform services to help COPS carry out its mission. These services have included making payments to grantees, preparing monthly treasury reports, entering grant obligations and deobligations in the financial system, processing and verifying electronic direct deposit information, and maintaining the Letter of Credit Electronic Certification System accounts, among others. From FY 1999 through FY 2002, the COPS Office shifted a total of about \$16 million of M&A funds to OJP through the use of reimbursable agreements for OJP to perform services related to programs administered by the COPS Office. However, we did note that the COPS Office has taken steps to reduce its use of OJP services by assuming responsibility for some functions previously performed by

OJP such as reviewing and approving final grant award budgets, providing financial management training to grantees, and coordinating with the OIG to resolve and close COPS grantee audit reports.

Overlap in Grant Programs Between the COPS Office and OJP

Our audit also identified overlap between the types of grants awarded by the COPS Office and OJP. For example, the COPS Universal Hiring Program (UHP) grants, Making Officer Redeployment Effective (MORE) grants, COPS in Schools (CIS) grants, COPS Safe Schools Initiative (SSI) grants, and COPS Secure Our Schools (SOS) grants are sometimes duplicative of grants awarded by OJP under the Local Law Enforcement Block Grants (LLEBG) program. While the LLEBG grants allow payment for a broader variety of costs than the COPS grants, the COPS UHP grants and CIS grants, as well as OJP's LLEBG grants, pay to hire officers to support community policing. Also, both the COPS MORE grants and OJP's LLEBG grants pay to hire civilians and to purchase technology equipment such as computers. In addition, both the COPS SSI and SOS grants and OJP's LLEBG grants pay to purchase equipment to help make schools safer. This overlap resulted when Congress created multiple programs to fund similar issues. However, both COPS and OJP officials told us that no formal communication procedures exist between the two agencies to ensure that grantees do not receive funds for similar purposes from both agencies.

Lack of On-Line Application Processing at the COPS Office

The COPS Office had developed an automated system, called the COPS Management System, to track its grants from application review to closeout. The COPS Office had also implemented several post-award functions online such as allowing grantees to provide information on grant progress using the "COPS Count" and performing account maintenance functions. However, we determined that the COPS Office had not developed a capability to receive grant applications online and download the application data directly into the COPS Office's grant management system. Potential COPS grantees must either mail, e-mail, or fax grant applications to COPS and then COPS must manually enter the application data into the COPS Management System for processing. COPS officials stated that the online application capability would be addressed as part of the e-government and Public Law 106-107 initiatives managed by OMB. The COPS Office had created and filled an e-government program manager position and established a business practices group to analyze its grant

application process and provide information to OMB for development and approval of an online application system.

Inefficiencies in OJP's Automated Systems

OJP does not have a fully effective automated system to manage its Federal financial assistance funds. We found that OJP had more than 70 automated application systems in place. Some of these systems were developed by the individual components within OJP and duplicate information in other OJP systems. Despite having more than 70 automated systems to help manage its Federal financial assistance funds, OJP still relies primarily on a manual system for processing grants. OJP uses a "Redbook" to process grants from application through award. The "Redbook" is a manual binder for each grant awarded to a particular grantee that contains all documentation, such as the grant application, documentation on the application review, the award package, and supporting information. The "Redbook" is assembled and routed through various OJP components for review, analysis, and certification.

OJP has made efforts to automate some of the "Redbook" process, and some "Redbooks" now use the automated Grant Management System (GMS).⁷ However, this process is not completely automated using the GMS. The GMS "Redbook" process allows the users to complete required forms in the GMS, but the forms are then printed out and maintained manually in the "Redbook." In addition, we noted additional inefficiencies related to the GMS system. Although we were told that the Assistant Attorney General for OJP said that all OJP components will use the GMS system, we found that GMS was used primarily by the program offices, and based on our interviews with GMS users, many users had complaints about the system. One drawback of GMS is that it only tracks grants from solicitation through grant award. The system does not maintain information on grant monitoring and closeout after the grant is awarded.

OJP recognizes that its automated systems need to be streamlined and as part of its reorganization OJP hired a Chief Information Officer, who began addressing the GMS-related issues. In addition, during our audit OJP hired a consulting firm to evaluate different alternatives for implementing an effective grants management system at OJP. The consulting firm evaluated the following four alternatives:

⁷ The GMS system was initiated in December 1998 as a pilot program to streamline the solicitation, application, and award of grants by using an automated system.

- Complete custom development of a new system.
- Purchase of a Commercial Off the Shelf (COTS) system.
- Integrating the current GMS system with COTS modules.
- Acquiring a Government Off the Shelf system.

In its September 2002 report, the consultant recommended that the best solution for OJP would be to integrate the current GMS system with modules that would expand the system to manage grants from beginning to end. In our judgment, the consultant's report presented a convincing case for expanding the GMS system.

A helpful feature of the GMS is that it allows potential grantees to submit applications online directly into the system. However, as previously noted, the GMS system was used primarily by the program offices. OJP's bureaus, for the most part, were not using GMS. Some bureaus used other automated systems that have online application capability, but these systems were only used for 3 of the 47 grant programs administered by the bureaus. As a result, online application was not available for many grant programs administered by OJP bureaus. On January 17, 2003, the Assistant Attorney General for OJP mandated that all OJP bureaus and program offices use GMS to process grant applications electronically. OJP needs to ensure this mandate is implemented.

OJP's Overlapping Organization Structure

Within OJP, financial assistance programs are split among numerous bureaus and program offices, resulting in reduced efficiency in awarding and administering grants. The inefficient organization of OJP has long been recognized by Congress, OMB, and OJP itself, but numerous plans to reorganize and streamline OJP have not been implemented. The current OJP administration has developed another reorganization plan to streamline its operations and appears committed to implementing the plan. OJP has begun implementing this plan, which does contain some positive steps towards improving the efficiency and effectiveness of Federal financial assistance programs. Specifically, the plan calls for the creation of a Chief Information Office responsible for improving OJP's grant management system. OJP recently hired a Chief Information Officer (CIO) to head this office and the CIO has begun efforts to improve OJP's grant management system. OJP's reorganization plan also calls for major restructuring of its bureaus, program offices, and support offices to streamline its operations and reduce duplication and overlap between offices. While the restructuring is a positive step towards streamlining

OJP's operations, we concluded that it would not eliminate all the duplication between OJP's bureaus and program offices. For example, we found that both OJP's Bureau of Justice Assistance and Office of Domestic Preparedness award grants for equipment and materials to help State and local governments respond to terrorist acts. However, these offices remained separate in the reorganization.⁸

Recommendations

In our report, we made eight recommendations to help improve the efficiency of OJP and the COPS Office. We recommended the Director of COPS and the Assistant Attorney General for OJP improve coordination between the two agencies to eliminate any duplication of effort and ensure that awards are not made to the same grantee for similar purposes. We also recommended that the Director of COPS continue efforts to implement an online application system for COPS grants that will allow potential grantees to complete grant applications online and that directly downloads the application data to the COPS Management System for processing. Further, we recommended that the Assistant Attorney General for OJP continue efforts to implement OJP's current reorganization plan and to identify and eliminate overlapping programs that will still exist after the reorganization is implemented. We also recommended that OJP take steps to ensure the: 1) "Redbook" process is automated, 2) implementation of the consultant's recommendation to integrate the current GMS system with modules that would expand the system to manage grants from beginning to end, 3) identification and elimination of duplicative automated systems within OJP, and 4) bureaus use the GMS system to enable online application capability for all bureau grant programs.

⁸ This duplication was eliminated within OJP on March 1, 2003, when OJP's Office of Domestic Preparedness transferred to the new Department of Homeland Security. However, duplication may exist between OJP's Bureau of Justice Assistance and the Department of Homeland Security's Office of Domestic Preparedness.

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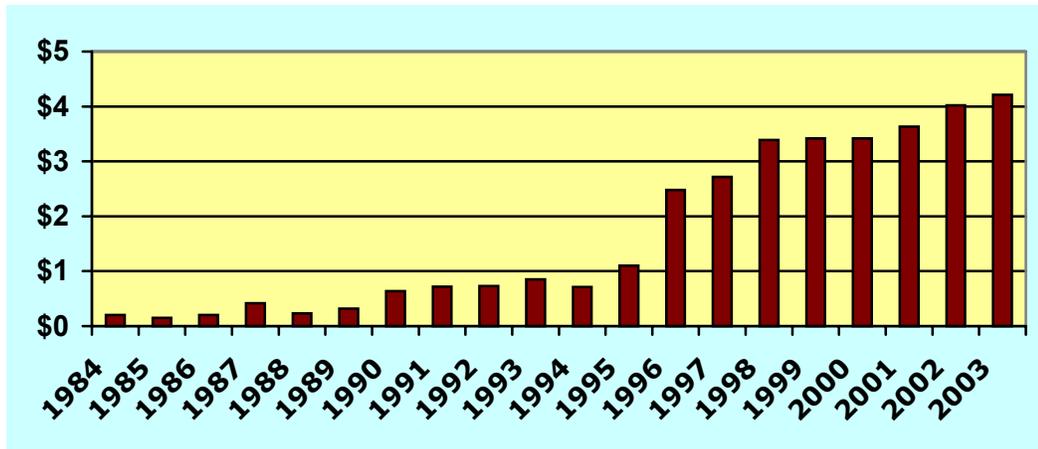
BACKGROUND

Office of Justice Programs

The Office of Justice Programs (OJP) was established in 1984 by the Justice Assistance Act to develop the nation's capacity to prevent and control crime, improve the criminal and juvenile justice systems, increase knowledge about crime and related issues, and assist crime victims. OJP's initial organization included several previous entities from the Law Enforcement Assistance Administration (LEAA), which had been created by the Omnibus Crime Control and Safe Streets Act of 1968. The LEAA was the first comprehensive State program designed to provide funding to States to reduce crime. The OJP carryover organizations from LEAA included the Bureau of Justice Assistance, the Bureau of Justice Statistics, the National Institute of Justice, and the Drug Courts Program Office.

Each year, OJP receives appropriations through the annual Commerce-Justice-State (CJS) Appropriations Bill. As shown in the chart below, from FY 1984 through FY 2003, OJP received about \$34 billion to carry out its mission.

**OJP Budget by FY
(Billions)**

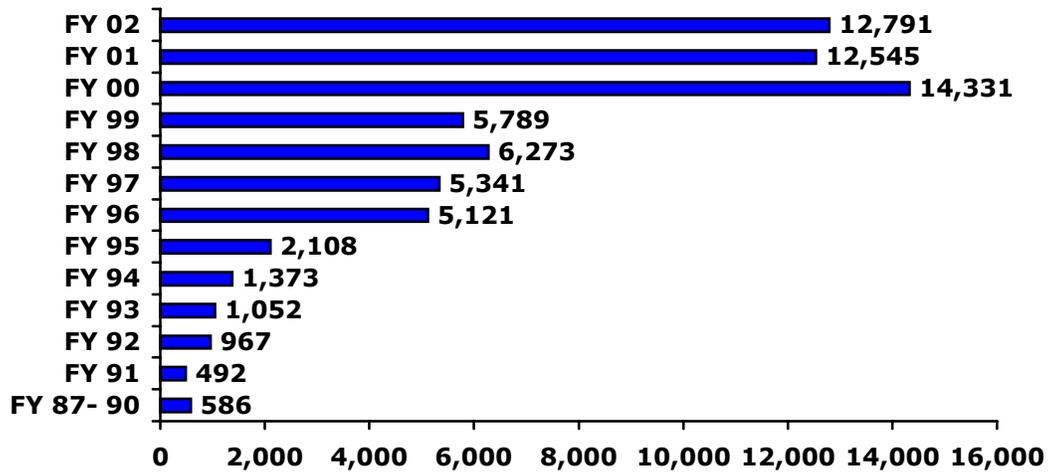


Source: OJP's Enacted Budgets

As of the end of FY 2002, OJP reported that it had awarded more than 68,700 grants, totaling more than \$31 billion, for a wide variety of programs. For a description of the major grant programs administered by OJP, see Appendix 2. The charts below detail the number of grants and funds awarded by OJP from FY 1987 through FY 2002.⁹

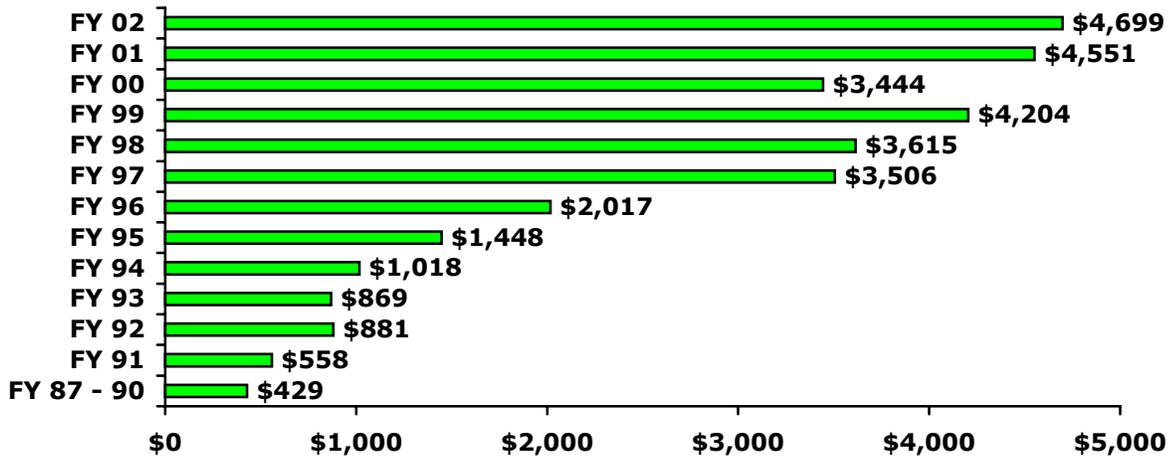
⁹ OJP was not able to provide data on grants it awarded from FY 1984 through FY 1986.

**Number of Grants Awarded by OJP
From FY 1987 Through FY 2002**



Source: OJP

**Amount of Funds Awarded by OJP
From FY 1987 to FY 2002
(Millions)**



Source: OJP

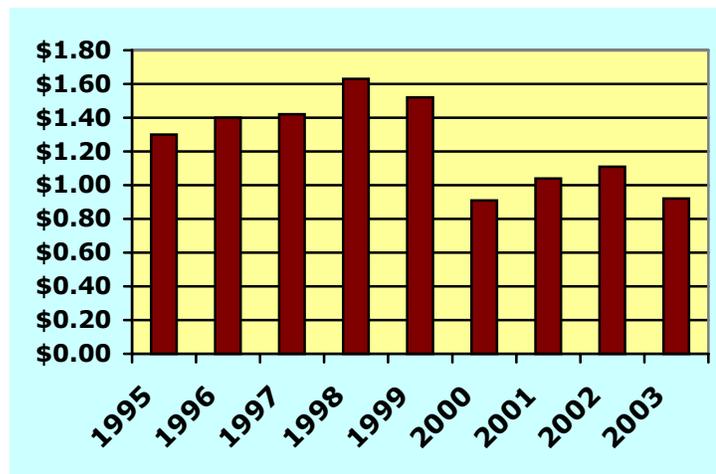
Office of Community Oriented Policing Services

On September 13, 1994, President Clinton signed into law the Violent Crime Control and Law Enforcement Act of 1994 (commonly known as the "1994 Crime Act"). The 1994 Crime Act authorized \$8.8 billion over six years, the purpose of which was primarily to fund grants for adding community oriented policing officers to the nation's streets and advancing community policing nationwide. To implement the program, the Attorney

General created a new program office within the Department of Justice known as the Office of Community Oriented Policing Services (COPS).

Each year, the COPS Office receives appropriations through the annual CJS Appropriations Bill. As shown in the chart below, from FY 1995 through FY 2003, the COPS Office received about \$11.3 billion to carry out its mission.

**COPS Office Budget by FY
(Billions)**

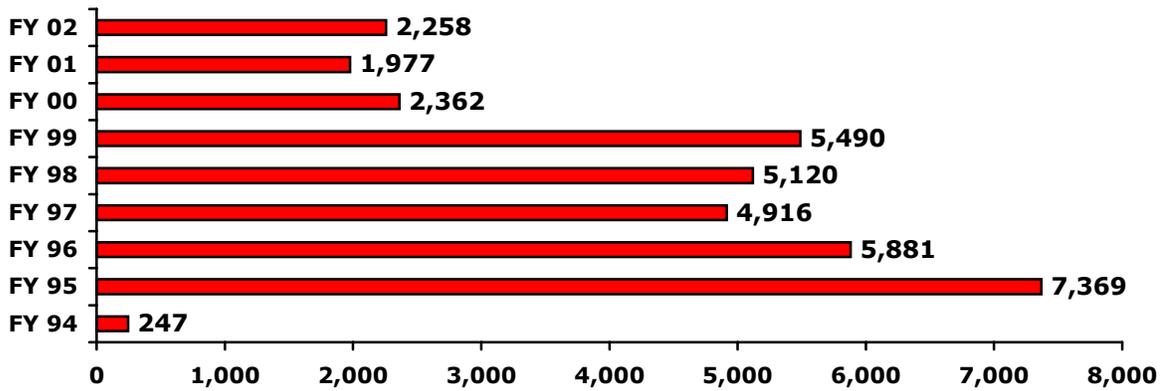


Source: COPS's Enacted Budgets

As of the end of FY 2002, the COPS Office reported that it had awarded more than 35,600 community policing grants, totaling more than \$8 billion, to deploy more than 116,700 additional officers to the nations streets. For a description of the community policing grants awarded by the COPS Office, see Appendix 3. The charts below detail the number of grants awarded, funds awarded, and number of officers reported as funded from the inception of the COPS program through FY 2002.¹⁰

¹⁰ The FY 1994 totals are for the Police Hiring Supplement grants awarded by OJP but administered by the COPS Office beginning in FY 1994. The FY 1995 totals include data for the Phase I COPS grants awarded by OJP for the COPS Office.

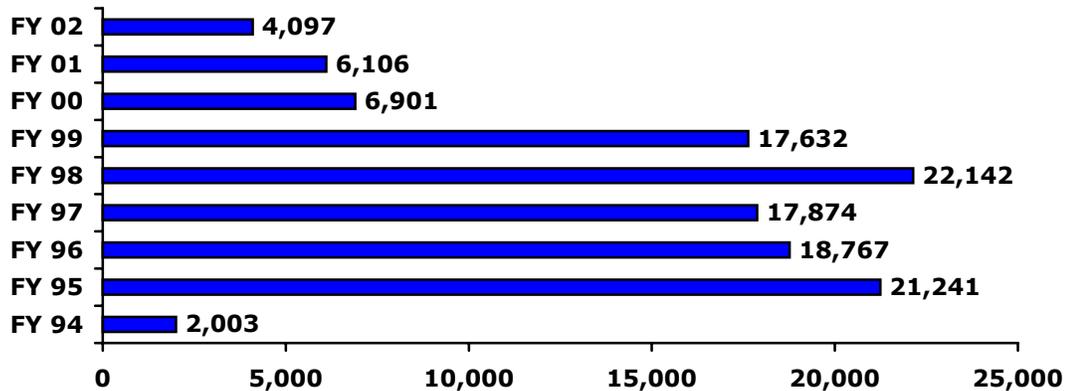
**Number of Grants Awarded by COPS
From FY 1994 to FY 2002**



**Amount of Funds Awarded by COPS
From FY 1994 to FY 2002
(Millions)**



**Number of Officers Funded by COPS
From FY 1994 to FY 2002**



Source for Above Graphs: COPS

Prior Audits

Since October 1994, the Office of the Inspector General (OIG) has issued more than 450 audit reports on recipients of grants awarded by either the COPS Office or OJP. The OIG has also issued reports on the management and administration of the COPS program.

- In April 1999, the OIG issued an audit report summarizing the results of 149 audits of COPS grantees that we performed during FYs 1997-1998 (See Police Hiring and Redeployment Grants: Summary of Audit Findings and Recommendations, October 1996 - September 1998 (No. 99-14)). The 149 COPS grantees had received about \$511 million in grant funds. The summary report concluded that based on the 149 individual COPS grant audits, significant numbers of jurisdictions audited were: overestimating salaries and benefits or including unallowable costs in reimbursement requests, (2) using State funds to supplant local funds, (3) not making a good-faith effort to fill locally-funded sworn officer positions, (4) not submitting or submitting late status reports to the COPS Office and OJP, and (5) not establishing systems to track the redeployment of officers into community policing. The summary report also concluded that some jurisdictions might have difficulty retaining COPS-funded officer positions with local funds at the conclusion of the grants. Since September 1998, we have continued to audit COPS grantees and have continued to identify the same findings reported in the summary report. The COPS Office strongly disagreed with our reliance on individual grantee audit reports and our interpretation of these findings.
- In July 1999, the OIG issued an audit report that reviewed the COPS Office's and OJP's administration of the \$8.8 billion community-policing program. (See Management and Administration of the Community Oriented Policing Services Grant Program (No. 99-21)). This audit evaluated the: 1) COPS Office's ability to meet President Clinton's goal to put 100,000 additional police officers on the street by FY 2000, 2) COPS Office's and OJP's monitoring of grantees, and 3) quality of guidance provided to grantees to assist them in implementing essential grant requirements. The audit concluded that the COPS grants would not result in 100,000 additional officers on the streets by the end of FY 2000. This audit also determined that many grantees did not submit the required program monitoring and financial reports and that the COPS Office's on-site monitoring reviews did not

consistently cover all grant conditions. Moreover, the audit concluded that the COPS Office and OJP did not adequately follow up on deficiencies found in on-site reviews to ensure that the deficiencies were corrected.

FINDINGS AND RECOMMENDATIONS

FINDING 1: STREAMLINING THE OFFICE OF COMMUNITY ORIENTED POLICING SERVICES

From the beginning of the Office of Community Oriented Policing Services (COPS) in 1994, the COPS Office has relied on the Office of Justice Programs (OJP) to perform services related to the COPS program. In recent years the COPS Office's management and administration (M&A) costs per program dollar have been higher than OJP's. Also, the COPS Office's M&A costs per grant administered have increased, while OJP's M&A costs per grant administered have decreased. Moreover, we determined that the major COPS grants for hiring officers and civilians and for purchasing equipment, and the grants awarded by OJP under the Local Law Enforcement Block Grants (LLEBG) program overlapped, and no formal coordination existed between COPS and OJP to ensure grantees did not receive funds for similar purposes from both agencies. We also found that the COPS Office had not developed a capability to receive grant applications online and download the application information directly into its grant management system. Instead, grantees must submit applications and the application data must be manually input into the COPS's grant management system.

COPS Work Performed by OJP

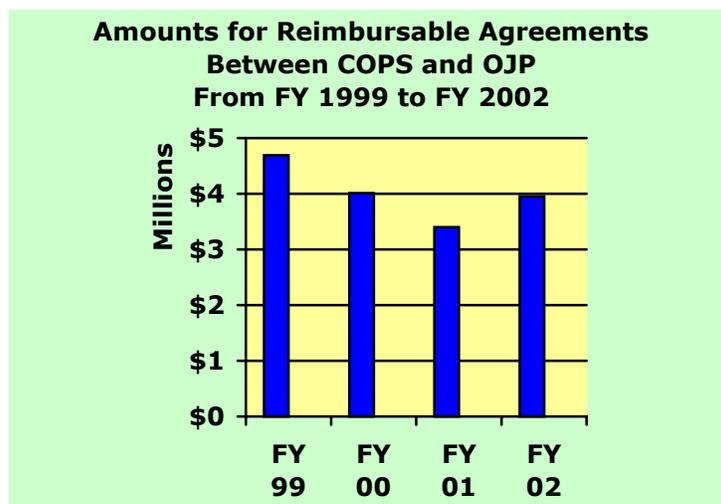
While the COPS Office has responsibility for managing and administering the community oriented policing services program for the Department, the COPS Office has continually relied upon OJP to perform services related to the administration of COPS Office activities. The COPS Office's reliance on OJP began at the inception of the COPS program in 1994 and has grown since then. We identified the following ways that the COPS Office has relied on OJP:

- The COPS Office initially relied on OJP to award grants under the COPS program.
- The COPS Office has entered into reimbursable agreements with OJP over the past several years for OJP to perform services related to the COPS program.
- The COPS Office has passed through much of its budgeted funds to OJP during the past several years for OJP to administer.

A discussion of each way the COPS Office relies on OJP follows.

Initial COPS Grants Awarded by OJP. When the COPS Office was established in 1994, it turned to OJP for assistance in awarding the first COPS grants funded by Congress. Prior to passage of the 1994 Crime Act, Congress created the Police Hiring Supplement (PHS) grant program that provided funds to State and local governments to hire police officers. OJP's Bureau of Justice Assistance (BJA) was responsible for awarding and administering the PHS grants, which were awarded in 1994. Because the BJA was already established and experienced in awarding the PHS grants to State and local governments, the Department had the BJA award the first phase of COPS grants for the COPS Office. These were the 392 Phase I COPS hiring grants awarded in FY 1995, less than 3 weeks after the COPS Office was created, that allowed State and local governments to hire new additional police officers to perform community policing. Subsequently, the COPS Office went on the award about 7,000 grants during the remainder of FY 1995. The requirements of the Phase I grants were very similar to the requirements of BJA's PHS grants. The BJA's awarding of the Phase I COPS grants was the first in a continuing line of services performed by OJP for the COPS Office.

COPS Program Services Performed by OJP. Beginning in FY 1995, and continuing every year since, COPS has entered into reimbursable agreements with OJP to perform services related to the COPS program. As shown in the following chart, since FY 1999, the COPS Office has transferred a total of about \$16 million in M&A costs to OJP through reimbursable agreements for OJP to perform services related to programs administered by the COPS Office.



Source: OJP Audit Liaison

According to OJP, the services it currently performs for the COPS Office are as follows:

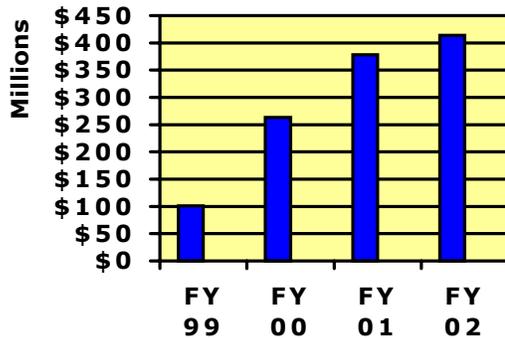
- Processes and verifies payments to COPS grantees and disburses funds in accordance with legal requirements
- Resolves daily payment rejects and cancellations, as appropriate
- Processes payment adjustments for COPS grant activity such as returned checks, changes in banking information, and vendor identification numbers
- Reconciles cash to Treasury (SF-224) and to the Integrated Financial Management Information System (IFMIS) for COPS financial activity on a monthly basis
- Creates and generates financial reports and performs financial analyses, as requested
- Submits quarterly Federal Assistance Award Data System reports to the Census Bureau
- Maintains official financial records in the OJP Office of the Comptroller for all COPS grantees
- Provides data entry and/or interface transfers for awards, modifications, supplements, extensions, and signed COPS awards into IFMIS, as appropriate.
- Provides COPS grantees with Phone Activated Paperless Request System (PAPRS - a system for requesting grant reimbursements via telephone) payment packages, which includes payment access information
- Maintains the PAPRS system and the Letter of Credit Electronic Certification System (LOCES)
- Maintains an auditable accounting system with financial and management controls to accurately and timely record accounting transactions for obligations, deobligations, expenditures, drawdowns, and receivables (returned checks from grantees)
- Conducts financial grant closeouts of COPS grants
- Maintains an accounting system to produce standard and customized reports for producing and/or reconciling to the Statement of Transactions (SF-224) and for complying with other Federal reporting requirements
- Maintains an accounting system to allow current and prior year adjustments accounting entries
- Maintains an interface between IFMIS, Justice Management Division (JMD), and other legacy systems, to upload data as appropriate
- Maintains the IFMIS menu option for COPS-specific reports
- Establishes and maintains user identification numbers in IFMIS, reset passwords, and assisted IFMIS users

- Provides JMD with grant data for grant accruals
- Prepares COPS's financial reports for inclusion in JMD's financial statements that include COPS financial activity
- Conducts financial monitoring of COPS grants and provides results to COPS management
- Provides audit resolution/closure of COPS-related Single Audit Act audit reports
- Processes grant adjustment notices, as appropriate
- Manages COPS's vendor information in IFMIS
- Resolves COPS's vendor issues, as appropriate
- Analyzes and responds to audit confirmations from independent Certified Public Accountant firms for COPS grant activity
- Develops, maintains, and interprets written financial grants management policy and procedures and included same in OJP's Financial Guide

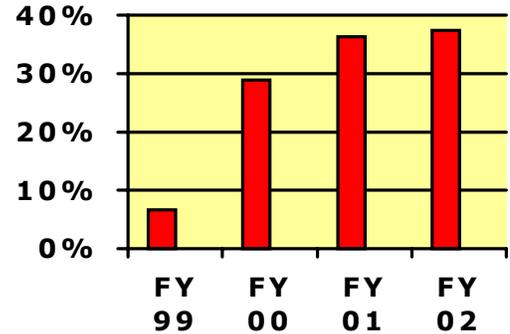
We noted that the COPS Office has taken steps to reduce its use of OJP services by assuming responsibility for some functions previously performed by OJP such as: 1) reviewing and approving final grant award budgets, 2) providing financial management training to grantees, 3) coordinating with the OIG to resolve and close COPS grantee audit reports, and 4) assisting in negotiating repayment agreements with grantees and establishing payment schedules. Nonetheless, while the COPS Office has reduced the redundancies between the two agencies by using OJP to perform these services for the COPS program, the use of reimbursable agreements indicates that OJP is better suited to provide these functions for the COPS program.

COPS Funds Passed Through to OJP. In addition to the COPS Office relying on OJP to perform services related to the COPS program, the COPS Office has continually passed a portion of its funds to OJP to administer since FY 1999. The amount of funds passed through to OJP has steadily increased and reached almost 40 percent of COPS's total budget during FY 2002. As shown in the following chart, the trend has clearly been a steady decrease in the percentage of the COPS Office's budget managed and administered by the COPS Office.

**COPS Funds Passed Through to OJP
From FY 1999 to FY 2002**



**Percent of COPS Budget Passed
Through to OJP From FY 1999 to
FY 2002**



Source: OIG Analyses of Budget Data

COPS funds are passed through to OJP in various ways. Most of the funds passed through to OJP are mandated by Congress in the COPS Office's annual appropriations language, a practice that began in FY 1999.¹¹ In FY 2002, the mandatory pass-through funds totaled \$361.9 million. An example of a mandatory pass-through for FY 2002 was for the Police Corps program. In FY 2002, COPS's budget contained \$14,435,000 for the Police Corps program. The Police Corps was created to help address violent crime by increasing the number of officers with advanced education and training who are assigned to community patrol. The central component of the Police Corps program is the provision of financial assistance and basic police training to college students who agree to serve as police officers for four years, along with financial assistance to participating police departments and sheriff offices. A second component offers no-obligation college scholarships to children of law enforcement officers killed in the line of duty. The authorizing language in the COPS Office's approved budget provided that the Police Corps funds would be transferred to OJP to administer. As such, the COPS Office passed through to OJP all \$14,435,000 approved for the Police Corps program in FY 2002.

Another way the COPS Office passes through funds is through discretionary pass-throughs. Discretionary pass-throughs occur when the COPS Office and OJP agree that certain funds in the COPS Office's budget would be either best managed by OJP or best managed jointly and the COPS Office passes these funds to OJP at its discretion. For

¹¹ According to the COPS Office, the President's FY 2004 budget submission requests that the mandatory program pass-through funds be funded directly in OJP's budget rather than passed through from the COPS Office budget.

FY 2002, the discretionary pass-through funds totaled only about \$387,000, which was substantially less than the \$3.4 million in discretionary funds passed through to OJP in FY 2001. An example of a discretionary pass-through for FY 2001 was the jointly managed Comprehensive Indian Resources for Community and Law Enforcement (CIRCLE) program. The CIRCLE program is a three-year State initiative designed to empower American Indian communities to more effectively fight crime, violence, and substance abuse. In FY 2001, the COPS Office passed through \$2 million to OJP to administer the CIRCLE program.

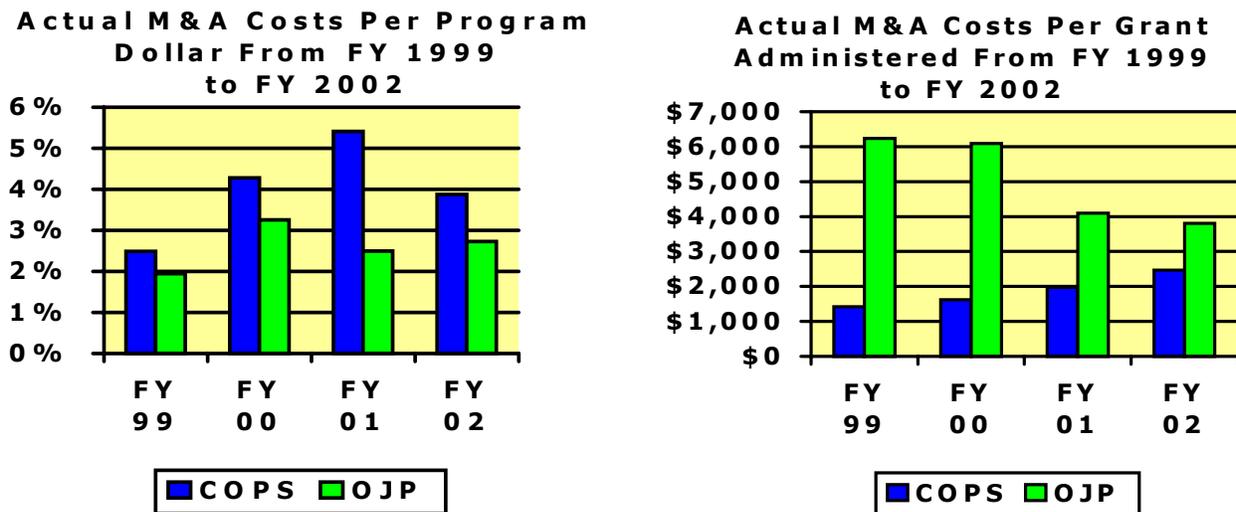
A third way that the COPS Office passes through funds to OJP is through earmarks. Earmarks are legislative directives in the appropriations laws that dictate how to spend certain portions of funds appropriated within larger funding programs. According to COPS officials, these funds are usually to continue projects previously administered by OJP or for programs that specifically fit within an existing OJP program. The legislative directives for the earmarks sometimes mandate that the funds be administered by OJP and at other times the COPS Offices passes through the earmark funds to OJP at its discretion. For FY 2002, the earmark funds passed through totaled \$51.4 million. An example of an earmark for FY 2002 was to continue the Safe Schools Initiative (SSI) previously administered by OJP. The SSI supports a comprehensive, integrated community-wide approach to promote healthy childhood development and address the problems of school violence and drug abuse. In FY 2002, at its discretion, COPS passed through \$9,531,000 of earmarked funds to OJP for the SSI. In most cases, once COPS passed through the funds, OJP assumed full responsibility for the management and administration of the funds.

Comparison of the COPS Office's and OJP's Costs to Manage and Administer Federal Financial Assistance Funds

The COPS Office and OJP both spend a large amount of money each year to manage and administer the Federal financial assistance funds awarded to State and local governments. From FY 1999 through FY 2002, Congress appropriated the COPS Office about \$126 million in management and administration (M&A) costs to administer about \$4.5 billion in program funds. During this same period, Congress appropriated OJP about \$155 million in M&A costs to administer about \$14 billion in program funds. We compared the M&A costs per program dollar spent and the M&A costs per grant administered for both the COPS Office and OJP for FY 1999 through

FY 2002. As illustrated in the following charts, the COPS Office annually spends more M&A costs per program dollar than OJP. In addition, while the COPS Office has spent less M&A costs per grant administered than OJP, COPS's M&A costs per grant administered increased each year from FY 1999 to FY 2002, while OJP's M&A costs per grant administered decreased each year from FY 1999 to FY 2002. Moreover, if the trend continues, the COPS Office will likely spend more M&A costs per grant administered than OJP in FY 2004.

Comparison of Actual M&A Costs for COPS and OJP



Source: OIG Analyses of Actual Costs and Grant Award Data

The COPS Office's M&A costs per grant administered are increasing because the COPS Office has not significantly reduced its personnel costs even though the grants administered by the COPS Office has significantly declined in recent years. OJP's M&A costs per grant administered are decreasing because OJP has kept its personnel costs relatively constant in recent years while it administered a significantly higher number of grants.¹²

Duplication Between COPS Grants and OJP Grants

In addition to reviewing the COPS Office's reliance on OJP and comparing the COPS Office's and OJP's M&A costs, we reviewed the types of grants awarded by the two agencies to determine if any duplication existed.

¹² The analyses comparing the COPS Office's M&A costs to OJP's M&A costs support that the COPS Office's M&A costs per program dollar have been higher than OJP's and that the COPS Office's M&A costs per grant administered are steadily increasing while OJP's M&A costs are decreasing. The analyses were macro analyses that do not take into account other variables that could affect each office's cost to administer grants such as hiring freezes and unexpected program changes.

We determined that the major COPS grants for hiring officers and civilians and for purchasing equipment were sometimes duplicative of grants awarded by OJP under the Local Law Enforcement Block Grant (LLEBG) program. While the LLEBG program is much broader in terms of what the program will fund, some of the allowable LLEBG expenditures are for the same purposes as the COPS Universal Hiring Program (UHP) grants, COPS Making Officer Redeployment Effective (MORE) grants, COPS in Schools (CIS) grants, COPS Safe Schools Initiative (SSI) grants, and COPS Secure Our Schools (SOS) grants. The LLEBG program provides funds for the following seven purposes:

- Supporting law enforcement efforts such as: 1) hiring, training, and employing additional law enforcement officers and necessary support personnel on a continuing basis; 2) paying overtime to currently employed law enforcement officers and necessary support personnel to increase the number of hours worked by such personnel; and 3) procuring equipment, technology, and other material directly related to basic law enforcement functions.
- Enhancing security measures in and around schools and other facilities or locations that the unit of local government considers special risks for incidents of crime.
- Establishing or supporting drug courts.
- Enhancing the adjudication of cases involving violent offenders, including cases involving violent juvenile offenders.
- Establishing a multi-jurisdictional task force, particularly in rural areas, composed of law enforcement officials representing units of local government. This task force must work with State law enforcement officials to prevent and control crime.
- Establishing crime prevention programs involving cooperation between community residents and law enforcement personnel to control, detect, or investigate crime or to prosecute criminals.
- Defraying the cost of indemnification insurance for law enforcement officers.

The COPS UHP and COPS CIS grants pay for officer salaries and fringe benefits to support community policing, and grants awarded under the first purpose of the LLEBG program also pay for officer salaries and fringe benefits to support community policing. For example, the City of Daytona

Beach, Florida received a COPS UHP grant for \$475,177 to hire seven officers to perform community policing and also received an OJP LLEBG grant for \$445,068 to hire five officers to perform community policing. Further, we found that similar to grants awarded under the LLEBG program, the COPS MORE grants pay for officer overtime (1995 grants only), hiring civilians to enable officers to be redeployed to the streets, and purchasing equipment that will save officers time and allow them to spend more time on the streets. The LLEBG grants awarded under the first purpose of the LLEBG program also pay for officer overtime, hiring civilians, and purchasing equipment. For example, the Orange County Florida Sheriff's Office received four COPS MORE grants totaling more than \$2.9 million to purchase computers and related accessories/software for officers and also received an OJP LLEBG grant that included \$26,142 to purchase computers and related accessories/software for officers.

Duplication also exists between the COPS Office's school safety grants and OJP's LLEBG grants awarded under the second purpose of the LLEBG program. The COPS SSI and SOS grants, as well as OJP LLEBG grants, pay for equipment to help make schools safer. For example, the City of Orlando, Florida received a COPS SOS grant for \$14,063 and an OJP LLEBG grant for \$40,000 to purchase equipment to make schools safer.

The duplicative grant programs between the COPS Office and OJP are a result of various statutes being passed that created multiple grant programs to fund similar items. We asked OJP and COPS officials how they coordinate their programs that have similar purposes. Both said that there are no formal coordination procedures between the two offices to ensure dual awards are not made to the same grantee. While the duplicative programs cannot be eliminated without getting the statutes revised, the COPS Office and OJP should establish procedures to coordinate with each other to ensure that grantees do not receive funds for the same purpose from both agencies.

We also noted that duplication exists between the COPS Office and OJP because both do similar functions related to the grants they award. Specifically, both the COPS Office and OJP spend considerable resources to develop grant programs, announce grant programs to the potential grantees, establish and disseminate grant criteria and application kits, review grant applications, award the grants, monitor implementation of the grants, manage follow-up on OIG audits of grantees, and close out grants.

Capability for Potential Grantees to Apply for Grants Online

The COPS Office had not developed an adequate capability for potential grantees to submit grant applications online. Potential grantees are able to obtain applications and information about the grants online. In addition, COPS has made several post-award functions available online such as allowing grantees to provide information on grant progress using the "COPS Count" and performing account maintenance functions. However, the capability does not exist for COPS to receive grant applications online and download the application information directly into the COPS Office's automated grant management system. All components in the COPS Office use the COPS Management System (CMS) to manage grants. The CMS system is an internally developed system that can be used to track all phases of the grant process from application receipt through grant closeout. However, potential grantees cannot submit applications online directly into CMS. Instead, potential grantees must mail, fax, or e-mail the applications to the COPS Office and the COPS Office must then manually enter the application data into the CMS. We believe the COPS Office should streamline the grant application process by developing an ability for potential applicants to apply for grants online with the online application data going directly into a COPS database. Such action should make the application data available to COPS grant managers more quickly and speed up the grant approval and award process.

COPS Office officials told us that an online application capability would be developed as part of the e-government and Public Law 106-107 initiatives managed by the OMB. The COPS Office created and filled an e-government program manager position and established a business practices group that has: 1) gathered information about the COPS Office's grant management processes, and 2) analyzed the application processes for the different COPS grants. The group also plans to develop data elements that are needed for an electronic application system and provide those elements to the OMB for approval.

Conclusion

From the inception of the COPS program in 1994, the COPS Office has relied on OJP to perform services related to the COPS program. The COPS Office's reliance on OJP has grown so much that nearly 40 percent of the COPS Office's budget was passed through to OJP during FY 2002. Further, in recent years the COPS Office's M&A costs per program dollar have been higher than OJP's. Also, the COPS Office's M&A costs per grant administered have been increasing while OJP's M&A costs per grant administered have been decreasing. In addition, some grants awarded by COPS have

duplicated the purpose of grants awarded by OJP and the offices perform overlapping functions. The COPS Office needs to better coordinate with OJP regarding the development of grant programs, and develop a capability for potential grantees to apply for grants online.

Recommendations:

We recommend the Director of COPS and the Assistant Attorney General for OJP:

1. Develop and implement a method of coordination to identify proposed programs and grants that have similar purposes and eliminate any duplication of effort to ensure that awards are not made to the same grantee for similar purposes.

We recommend the Director of COPS:

2. Continue to develop an online application system for COPS grants that will allow potential grantees to complete grant applications online and that supports the downloading of online application data directly to the COPS Management System for processing.

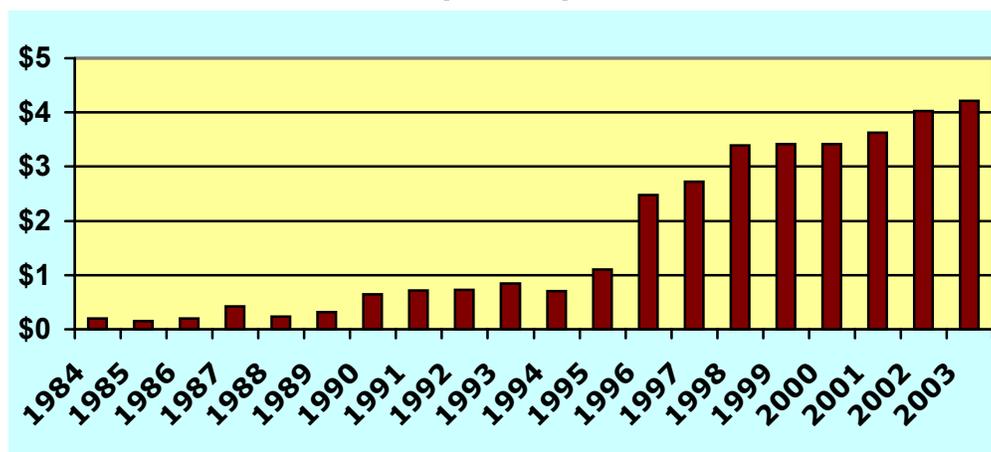
FINDING 2: STREAMLINING THE OFFICE OF JUSTICE PROGRAMS

Since the Office of Justice Programs (OJP) was established in 1984, it has experienced dramatic growth that included many new financial assistance programs created by Congress. Many of these programs are overlapping and have caused duplication and inefficiency within OJP that has long been recognized by Congress and OJP. Since 1997, OJP has developed multiple reorganization plans that have not been fully implemented. The current OJP management, installed in 2001, has developed a reorganization plan that contains steps to improve OJP's efficiency and effectiveness in awarding and administering Federal financial assistance programs. However, even after implementation of the plan, we believe that some duplication between grants awarded by different OJP offices will remain and some inefficiencies will not be fully addressed. For example, we found that OJP does not have a fully effective automated system to manage its grants, to include the ability for all potential grantees to apply for grants online. More fully addressing these issues in its current reorganization and streamlining efforts should further improve the efficiency and effectiveness of OJP's financial assistance operations.

Growth and Reorganization Plans of OJP

OJP's budget has grown dramatically since its establishment in 1984. As shown in the following chart, OJP's budget grew from \$197.4 million during FY 1984 to more than \$4.2 billion during FY 2003.

OJP's Budget by FY
(Billions)



Source: OJP's Enacted Budgets

The extensive growth of OJP may have contributed to the duplication and inefficiency, which OJP has long recognized. To

eliminate duplication and inefficiency within OJP, numerous plans have been developed to reorganize OJP.

- In FY 1997, in the conference report accompanying the Department's FY 1998 appropriations bill, the conferees observed that funding for OJP had grown tremendously, and asked the Assistant Attorney General (AAG) for OJP to submit a report that "outlines the steps OJP has taken and which recommends additional actions that will ensure coordination and reduce the possibility of duplication and overlap among the various OJP divisions." In response, in December 1997, the AAG submitted a report to Congress that presented options for improving coordination in OJP grant administration.
- In October 1998, in the conference report that accompanied the FY 1999 Department appropriations bill, OJP's AAG was asked to develop a plan for a new organization structure for OJP. Congress specifically directed the AAG to explore the consolidation and streamlining of agency activities in order to enhance OJP's stewardship of criminal and juvenile justice grant-in-aid initiatives. In response, in March 1999, the AAG submitted a proposed reorganization plan to Congress that had been cleared by OMB.
- In November 1999, Congress again addressed OJP's duplication and inefficiency when, in the conference report accompanying the FY 2000 Justice Department appropriations bill, it asked OJP to prepare and submit to Congress a "formal reorganization proposal" to implement selected components of OJP's March 1999 proposed reorganization plan. In response, OJP developed a proposal for implementing a new organization structure that was approved by the Attorney General in February 2000 and sent to Congress.
- In April 2000, Congress concurred with OJP's new organization proposal (as approved by the Attorney General in February 2000). In June 2000, the House Committee on Appropriations requested that OJP submit a report on its implementation of the reorganization plan approved by Congress. The report was due by December 31, 2000, but OJP did not submit the report as requested. Instead, OJP requested an extension until September 2001 to submit an interim report and until December 2001 to submit a final report on the implementation of the reorganization plan approved by Congress. OJP delayed its interim report due to the terrorist attacks in September 2001 and submitted its report to the House Committee on Appropriations in December 2001.

However, the report was not on OJP's implementation of the reorganization plan approved by Congress in April 2000. Instead, the report was a new, and the most recent, plan for reorganizing OJP.

In its most recent plan for reorganization, the current OJP administration presented eight objectives for: 1) improving responsiveness, assistance, and accountability to all customers; 2) eliminating duplication and overlap; 3) ensuring measurable grant and program outcomes; and 4) enhancing communication, cooperation, coordination, and efficiency. Specifically, the plan stated:

- OJP should have a strategic plan that reflects statutory requirements and the mission and goals of the President and the Attorney General.
- The statutes governing OJP bureaus and program offices should be amended to provide that all authority resides in the Attorney General.
- Management policies and procedures should be standardized throughout OJP.
- An OJP-wide grants management system should be instituted.
- OJP should be more responsive to the needs and questions of grantees.
- Centralized communication should be established at OJP.
- Coordination of legislative, statutory, and regulatory activities and reviews should be improved.
- OJP should consolidate and coordinate currently overlapping functions.

Both the House and Senate approved OJP's plan for reorganization in June 2002, except for combining the Office of Civil Rights with the Office of General Counsel. To accomplish the eight objectives of its current plan, OJP plans to implement its reorganization in three phases.

Phase I and Phase II of the reorganization plan deal primarily with reducing OJP's organization components from 20 to 15 and leaves the five

OJP bureaus intact.¹³ During our audit, OJP created a Chief Information Office and hired a Chief Information Officer, and established the reporting and chain of command for the Drug Courts Program Office within the Bureau of Justice Assistance. An OJP official stated that restructuring would take place during FY 2003 among the components. After the structural changes are in place, OJP says it will begin Phase III of its plan to obtain revisions to existing statutes that provide final grant-making authority to OJP's bureaus instead of to the Attorney General or Assistant Attorney General for OJP.

We believe OJP's planned organization structure, some of which has already been implemented, should improve the efficiency and effectiveness of OJP's Federal financial assistance programs. Specifically, OJP has begun efforts to improve OJP's automation of the grant management process by hiring a consultant to evaluate alternatives for implementing an effective system. In addition, the reduction and realignment of program and support offices within OJP should help reduce duplication and inefficiency cited by OJP and should improve communication among OJP components. For example, moving the Drug Courts Program Office under the Bureau of Justice Assistance should enable better communication between these offices and eliminate duplicate grants awarded by the two offices since, as separate offices, both award grants to State and local governments to establish adult and juvenile drug courts.

Issues Not Fully Addressed by the Reorganization Plan

Implementation of OJP's reorganization plan will not eliminate all duplication among OJP programs. For example, OJP's Office for Domestic Preparedness awards grants for equipment to help State and local government agencies respond to terrorist acts such as the use of weapons of mass destruction. OJP's Bureau of Justice Assistance awards LLEBG grants that also pay for equipment for State and local government agencies to respond to terrorist acts. OJP's reorganization did not effectively address this duplication because the two offices remained separate in the new organization.¹⁴ In addition, the duplication and overlap that exists among OJP's bureaus will not be eliminated unless OJP is successful at implementing Phase III of its reorganization to obtain revision of the existing

¹³ See Appendix 4 for organization charts showing OJP's organization structure before and after the reorganization.

¹⁴ This duplication within OJP was eliminated on March 1, 2003, when OJP's Office of Domestic Preparedness transferred to the new Department of Homeland Security. However, duplication may exist between OJP's Bureau of Justice Assistance and the Department of Homeland Security's Office of Domestic Preparedness.

statutes governing the authority of its bureaus. OJP has repeatedly identified the following overlap and duplication among OJP's bureaus:

- At least four bureaus address domestic violence.
- All five bureaus address child abuse.
- At least three bureaus address juvenile drug use.
- At least four bureaus address youth violence.

We identified another area that we believe needs significant attention in order for OJP's streamlining efforts to be fully successful. Specifically, OJP needs to significantly improve its automated management of Federal financial assistance programs. We determined that OJP's automation of Federal financial assistance programs needs strengthening because OJP: 1) still uses a manual system to record and review many steps in the grant process; 2) has an automated Grant Management System (GMS) that does not track grants from solicitation to close-out; 3) has multiple automated systems in use by OJP offices, some of which contain duplicate data; and 4) has not developed an online application capability for many of its grant programs.

Manual System to Process Grants

OJP uses a manual system called the "Redbook" to process grant awards from application through grant award. The "Redbook" is a binder for each grant awarded to a particular grantee that holds all documentation, such as the grant application, documentation on the application review, the award package, and supporting information, up to the grant award. The "Redbook" is assembled and routed through various OJP components for the purpose of review, analysis, and certification. Specifically, the "Redbook" goes through the following process in sequential order:

- The "Redbook" is originated by the OJP office that will award the grant.
- The originating office passes the "Redbook" to the support offices for required analyses such as financial reviews, legal analysis, etc.
- In the final phase before award approval, the Office of the Comptroller reviews the "Redbook" and certifies that the grant is ready for approval.
- The Assistant Attorney General for OJP, or the designated person, approves the grant for award.

This manual process is cumbersome and slow, since the "Redbook" must be routed through each office one at a time. Automation of this process could allow the different offices to do some of their tasks simultaneously and help speed up the award process. OJP has made efforts to automate some of the "Redbook" process in that it now has some "Redbooks" that use the automated Grant Management System (GMS). However, even though the "Redbook" process that uses GMS has the forms available in GMS, the forms are still printed out and maintained manually in the "Redbook." During the audit, OJP's Chief Information Officer reviewed the "Redbook" process and began implementing plans to fully automate the process. According to OJP, the new system will automate grants management from the solicitation process to grant closeout and full implementation is expected by the end of calendar year 2003. We believe that OJP should monitor the progress of actions to fully automate the application and award process and eliminate the cumbersome and inefficient manual "Redbook" process, and ensure the process is fully automated by the end of calendar year 2003.

Grant Management System

The GMS system was initiated in December 1998 as a pilot program to streamline the solicitation, application, and award of grants by using an automated system. However, the GMS is currently not in widespread use among OJP components and based on our interviews with GMS users, many users had complaints about the system. One drawback of GMS is that it only goes from solicitation through grant award. It does not maintain information on grant monitoring and closeout after the grant is awarded. In addition, the users complained that:

- The system does not block ineligible applicants.
- Applicants reported glitches in the system while trying to apply for grants.
- Applications are sometimes lost after submission.
- Information is sometimes lost by the system during data entry.
- The system is not web-based, which would allow grantees to learn about all OJP grants that provide similar services.

As part of its reorganization, OJP hired a Chief Information Officer, who began addressing the GMS related issues. In addition, OJP hired a consulting firm to evaluate different alternatives for

implementing an effective grants management system at OJP. The consulting firm evaluated the following four alternatives:

- Complete custom development of a new system.
- Purchase of a Commercial Off the Shelf (COTS) system.
- Integrating the current GMS system with COTS modules.
- Acquiring a Government Off the Shelf system.

In its September 2002 report, the consultant recommended that the best solution for OJP would be to integrate the current GMS system with modules that would expand the system to manage grants from beginning to end. In our judgment, the consultant's report presented a convincing case for expanding the GMS system. As previously noted, during the audit the Chief Information Officer began implementing plans for a new grant management system that will automate the process from solicitation to grant closeout. We believe that OJP should monitor the progress towards implementation of the recommendations in the consultant's report to enable OJP to more efficiently manage the administration of grants from beginning to end, and ensure the recommendations are implemented by the end of calendar year 2003.

Multiple Automated Systems

We found that OJP has more than 70 automated application systems to help manage its operations. A brief description of these systems is contained in Appendix 5. While many of these systems are no longer used to manage new grants, they contain data on older and sometimes still active grants and are still used by OJP to manage these grants. Some of these systems were developed by the individual components within OJP and duplicate information in other OJP systems. In addition, although the AAG for OJP recently determined that all OJP offices should use GMS as the standard system for tracking OJP grants, we found that the bureaus are not using GMS for most programs. The bureaus continue to use their own systems for tracking grants. OJP recognizes that its automated systems need to be streamlined, which is one reason that it decided to hire a Chief Information Officer as part of its reorganization. OJP has also: 1) hired a consulting firm to develop and present alternatives for automated grant management, 2) began the development of an Information Technology Strategic Plan to address OJP's automation of the grant management process, and 3) reported initiating a process to eliminate automated systems that overlap or are duplicative of capabilities in the new grants management system. OJP expects to

eliminate all overlapping or duplicative systems by the end of calendar year 2003 when the new grants management system is fully implemented. We believe that OJP should monitor the progress of actions to identify and eliminate automated systems which perform duplicative functions or contain duplicative data, and ensure the duplications are eliminated by the end of calendar year 2003.

Online Application Capability

OJP had not fully developed an ability for potential grantees to submit grant applications online. OJP's program offices all use the GMS system, which does allow for potential grantees to submit applications online directly into the system. However, OJP's bureaus were not required to use GMS until early in 2003, after our audit fieldwork. We found that the bureaus use other automated systems that have online application capability, but these systems are only used for 3 of the 47 grant programs administered by the bureaus. As a result, online application was not available for most grant programs administered by OJP's bureaus. Based on our interviews with officials at the five bureaus, the bureaus were in favor of fully automating the grant award process to improve the efficiency of awarding grants. On January 17, 2003, the Assistant Attorney General (AAG) for OJP mandated that all OJP bureaus and program offices use GMS to post all grant solicitations and to process applications for grant funding electronically. We believe that OJP should monitor the bureaus to ensure that they use GMS.

Conclusion

Since OJP was established in 1984 with an annual operating budget of \$197.4 million, OJP has experienced dramatic growth to reach an annual budget in FY 2002 of more than \$4 billion, with many new financial assistance programs. The current OJP management has begun concerted efforts to implement the reorganization of OJP. OJP's current reorganization plan contains positive steps to eliminate some duplication and overlap in the award and administration of grants, but it will not eliminate all duplication and overlap among OJP offices. In addition, although OJP's reorganization plan addresses weaknesses in its automated management of Federal financial assistance programs, we believe additional efforts should be focused on improving the automation of grant management functions within OJP.

Recommendations

We recommend the Assistant Attorney General for OJP:

3. Continue efforts to implement OJP's current reorganization plan.
4. Identify all the overlapping programs that will still exist after the reorganization is implemented and develop plans to either reorganize the overlapping programs or strengthen the communication between the overlapping offices to eliminate the duplication.
5. Monitor the progress of efforts to fully automate the "Redbook" process and ensure that the process is fully automated by the end of calendar year 2003 as planned.
6. Monitor the progress of actions to implement the consultant's recommendation to integrate the current GMS system with modules that would expand the system to manage grants from beginning to end, and ensure the expanded system is implemented by the end of calendar year 2003 as planned.
7. Monitor the progress of actions to identify and eliminate automated systems which perform duplicative functions or contain duplicative data, and ensure the duplicative systems are eliminated by the end of FY 2003 as planned.
8. Monitor the bureaus to ensure they use the GMS system to enable grantees to submit grant applications online for all bureau grant programs.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

The objective of the audit was to identify activities and functions that can be streamlined to increase operational efficiency within the Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS).

Scope and Methodology

The audit was performed in accordance with Government Auditing Standards issued by the Comptroller General of the United States, and included tests and procedures necessary to accomplish the objective.

Generally, the audit focused on the administrative activities and grant functions within OJP and the COPS Office, as well as between OJP and the COPS Office. We performed audit fieldwork at OJP and COPS offices in Washington, D.C.

To accomplish the audit objective, we conducted 76 interviews with 80 officials from OJP, the COPS Office, the Department of Justice, and the Office of Management and Budget (OMB), among others. OJP officials interviewed included the Principal Deputy Assistant Attorney General for OJP and other officials in each of OJP's five bureaus, six program offices, and eight support offices. The COPS Office officials interviewed included the Director of COPS and other officials in the Director's office and each of the COPS Office's nine division offices. We also reviewed more than 360 documents, including OJP's and the COPS Office's management policies and procedures, grant management guidance, budget documentation, organization structures, Congressional testimony, and prior Office of the Inspector General reports. The interviews and analyses of documents included:

- Notifying OJP and COPS Office officials of the audit's purpose, objective, and scope;
- Reviewing applicable laws, program policies, procedures, organization charts, and mission statements;
- Reviewing prior audit reports and studies by the Department on related issues;
- Reviewing budgetary documents to determine the amount of funds budgeted and expended for each fiscal year;

- Interviewing OJP's and the COPS Office's component heads and officials to obtain an understanding of the operation of each office and to discuss special areas such as the e-government initiative, automated systems, and reorganization plans;
- Reviewing documents provided by the COPS Office and OJP to identify the Federal financial assistance programs administered;
- Analyzing documents provided by the COPS Office and OJP to determine for each agency the ratio of management and administration funds budgeted and expended to the: 1) program dollars budgeted and expended, and 2) grants administered; and
- Evaluating the award process for each financial assistance program (grants, cooperative agreements, etc.).

The interviews and analyses of documents were completed to:

- Obtain an understanding of OJP's and the COPS Office's organization structures,
- Identify the different types of Federal financial assistance awarded by OJP and the COPS Office,
- Assess whether Federal financial assistance functions are duplicated within and/or between OJP's and the COPS Office's programs,
- Assess whether OJP's planned reorganization will minimize or eliminate duplication of administrative duties and Federal financial assistance functions, and
- Reconcile differences between what the COPS Office and OJP showed as funds passed through from COPS to OJP.

STATEMENT ON COMPLIANCE WITH LAWS AND REGULATIONS

We audited the administrative activities and financial assistance functions of the Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS). The audit period covered primarily from the inception of OJP in 1984 and COPS in 1994 through the end of FY 2002, and included a review of selected activities and transactions. The audit was conducted in accordance with generally accepted Government Auditing Standards.

In connection with the audit and as required by the standards, we reviewed procedures, activities, and records to obtain reasonable assurance about OJP's and the COPS Office's compliance with laws and regulations that, if not complied with, we believe could have a material effect on program operations. Compliance with laws and regulations is the responsibility of OJP's and COPS Office's management.

Our audit included examining, on a test basis, evidence about laws and regulations that related to OJP's and COPS Office's efforts to streamline Federal financial assistance functions. Specifically, we conducted tests related to OJP's and the COPS Offices implementation of Public Law 106-107: Federal Financial Assistance Management Act of 1999.

We did not identify any instances where OJP or the COPS Office was not in compliance with the law tested. With respect to those transactions not tested, nothing came to our attention that caused us to believe that OJP and the COPS Office were not in compliance with the law tested. However, we did note areas for additional streamlining within OJP and the COPS Office as discussed in the Findings and Recommendations section of this report.

APPENDIX 1

DESCRIPTION OF THE OFFICE OF JUSTICE PROGRAMS' BUREAUS, PROGRAM OFFICES, AND SUPPORT OFFICES

BUREAUS

Bureau of Justice Assistance (BJA). This bureau was established by the Omnibus Crime Control & Safe Streets Act of 1968 § 401. BJA provides funding, training, and technical assistance to State and local governments to combat violent, and drug-related crime and help improve the criminal justice system. This bureau now includes the former Drug Courts Program Office and the former Corrections Program Office.

Bureau of Justice Statistics (BJS). This bureau was established by the Omnibus Crime Control & Safe Streets Act of 1968 § 302. BJS collects and analyzes statistical data on crime and the operations of justice systems at all levels of government. It also provides financial and technical support to State governments in developing State capabilities in criminal justice statistics, improving criminal history records, and implementing crime identification technology systems.

National Institute of Justice (NIJ). This bureau was established by the Omnibus Crime Control & Safe Streets Act of 1968 § 202. NIJ supports research and development programs, conducts demonstrations of innovative approaches to improve criminal justice, develops and tests new criminal justice technologies, evaluates the effectiveness of justice programs, and disseminates research findings to practitioners and policy makers. NIJ also provides primary support for the National Criminal Justice Reference Service, a clearinghouse of criminal justice-related publications, articles, videotapes, and online information.

Office of Juvenile Justice and Delinquency Prevention (OJJDP). This bureau was established through the Juvenile Justice & Delinquency Prevention Act of 1974 § 201. OJJDP provides award funding to improve juvenile justice systems and sponsors innovative research, demonstration, evaluation, statistics, and technical assistance and training programs to improve the nation's understanding of and response to juvenile violence and delinquency.

Office for Victims of Crime (OVC). This bureau was established through the Victims of Crime Act of 1984 § 1411. OVC provides funding to States to support programs that provide direct assistance to crime victims and compensate crime victims for medical and other unreimbursed expenses

resulting from violent crimes. OVC also sponsors training for State, and local criminal justice officials and other professionals to help improve their response to crime victims and their families.

PROGRAM OFFICES

Office of the Police Corps and Law Enforcement Education (OPCLEE).

This program office was also created by the Violent Crime Control and Law Enforcement Act of 1994, but was established in the Office of Community Oriented Policing Services (COPS). In November 1998, OPCLEE transferred from the COPS Office to OJP. OPCLEE provides college educational assistance to students who commit to public service and to dependent children of officers killed in the line of duty.

Office on Violence Against Women (VAWO). This program office was established by the Violence Against Women Act of 1994. This office administers programs designed to detect, prevent, and stop violence against women, including domestic violence, sexual assault, and stalking. Subsequent legislation has established new programs, such as initiatives addressing elder abuse, violence against women with disabilities, transitional housing for domestic violence victims, battered immigrants, victims of dating violence.

Office for Domestic Preparedness (ODP). This program office was administratively established by the Conference Report 105-504 for the Commerce/Justice/State Appropriations for 1998 (P.L. 105-119); the Attorney General delegated authority to OJP to establish a program to develop and administer training for safety against biological and chemical terrorism. ODP develops and implements a national program to enhance the capacity of State and local agencies to respond to incidents of domestic terrorism, particularly those involving weapons of mass destruction, through coordinated training, equipment acquisition, technical assistance, and support for Federal, State, and local exercises.

Community Capacity Development Office. This program office provides direct services to the field by working closely with local communities to empower them to solve local problems and build capacity at the local level. This office includes the Executive Office for Weed and Seed and the American Indian and Alaskan Native Desk.

Executive Office for Weed and Seed (EOWS). This program office was established by the Department and Related Agencies Appropriations Act. EOWS coordinates the Weed and Seed strategy, a community based, multi-disciplinary approach to combating crime.

The office provides funding in attempts to weed out violent crime, gang activity, and drug use and trafficking in target areas, and then seed the target area by restoring the neighborhood through social and economic revitalization.

American Indian and Alaskan Native Desk. This office was established in OJP to enhance access to information by Federally recognized American Indian and Alaskan Native tribes regarding funding opportunities, training and technical assistance, and other relevant information.

SUPPORT OFFICES

Office for Civil Rights (OCR). This support office is responsible for ensuring that recipients of financial assistance from OJP, its component organizations, and the COPS Office are not engaged in prohibited discrimination. The OCR ensures that potential and existing grantees fully comply with all civil rights laws and regulations so that needed State assistance may commence or continue.

Office of General Counsel (OGC). This support office provides legal advice and guidance to OJP and its component bureaus.

Office of Communications. This support office is responsible for managing media and congressional activities to include:

- Notifying affected Congress members, United States Attorneys, governors, and State courts of OJP grants awarded each year.
- Tracking legislation that affects OJP.
- Managing correspondence and responses.
- Maintaining speeches and testimony.
- Preparing briefing books and papers for congressional hearings.
- Preparing reports such as OJP Annual Report.

This office also now includes the publishing central functions.

Chief Information Office. This support office provides automated systems development and support and network integration for OJP.

Office of Management and Administration. This support office combines the Office of Administration (except the Information Resources Management Division), Office of Budget and Management Services, Office of the Comptroller, and the Equal Employment Opportunity Office.

Office of Administration (OA). This support office serves as the principal advisor to the Assistant Attorney General for OJP on matters involving human resources recruitment and management; labor relations; contracting and procurement; property and space management; and the maintenance, safety, and security of facilities.

Office of Budget and Management Services (OBMS). This support office manages a wide variety of budget execution, formulation, and presentation activities, as well as management and planning, correspondence analysis, and coordination activities within OJP. Specifically, OBMS directs, coordinates, and prepares OJP's annual budget requests to Congress, the Office of Management and Budget, and the Department of Justice. Following annual appropriations, OBMS allocates and tracks all OJP funds, maintaining control of agency obligations, including grants, payments, agreements, and contracts. In addition, OBMS works with OJP's bureaus and offices to implement the National Performance Review, the Federal Managers' Financial Integrity Act, the Government Performance and Results Act, as well as other initiatives. Through its Executive Secretariat Staff, OBMS manages OJP's correspondence control system and provides advice and assistance to OJP components in the area of correspondence control. Finally, together with the Office of Congressional and Public Affairs, OBMS coordinates the Department's Young American Medals Program--a Presidential award program that recognizes deserving youth for acts of bravery and service.

Office of the Comptroller (OC). This support office is the principal advisor to the Assistant Attorney General for OJP on matters involving fiscal policy guidance and control, and supports accounting, financial and grants management, and claims collection services. The OC is comprised of four divisions responsible for providing support services for the offices and bureaus that comprise OJP. The four divisions are the: 1) Financial Management Division, 2) Accounting Division, 3) Monitoring Division, and 4) Training and Policy Division. The Financial Management Division is responsible for providing advice and guidance to OJP's offices and bureaus in the area of the financial management of grants and cooperative agreements, which includes ensuring the financial management and fiscal integrity of fund recipients; monitoring the internal grant process to ensure all required business management and fiscal integrity practices and actions are performed; conducting budget reviews of grant applications; developing, negotiating, and approving indirect cost allocation plans; providing technical assistance, both pre- and post-award, to grantees and program offices; and post-award administration of grants. The

Accounting Division is responsible for planning, developing, implementing, maintaining and upgrading an integrated accounting system in conformance with appropriate laws, regulations, and policies, to ensure proper fund accountability, fiscal control, and availability of financial data for decision making. The Monitoring Division is responsible for providing financial monitoring of grantees and monitoring, tracking, and resolving grantee audit reports, as well as providing technical assistance to grantees and program offices. The Training and Policy Division is responsible for providing financial management training and technical assistance to grantees, OJP, and Department staff, as well as the development and implementation of internal and external financial management policy.

Equal Employment Opportunity Office (EEO). This support office is responsible for ensuring that OJP provides equal employment opportunity for all employees and applicants on the basis of merit and without regard to race, color, religion, sex, age, national origin, sexual orientation, and physical or mental disability.

APPENDIX 2

DESCRIPTION OF GRANTS AWARDED BY THE OFFICE OF JUSTICE PROGRAMS

OFFICE OF JUVENILE JUSTICE AND DELINQUENCY PREVENTION (OJJDP)

Juvenile Accountability Incentive Block Grants Program (JAIBG)

The purpose of this program is to: 1) provide funds to develop programs to promote greater accountability in the juvenile justice system, 2) survey the field and identify projects that would benefit from research, demonstration, and evaluation in the 12 purpose areas identified in the JAIBG Program, and 3) provide training and technical assistance to States and units of local government so they may develop programs outlined in the 12 program areas to promote greater accountability in the juvenile justice system.

Juvenile Justice and Delinquency Prevention - Allocation to States

The purpose of this program is to increase the capacity of State and local governments to support the development of more effective education, training, research, prevention, diversion, treatment, accountability based sanctions, and rehabilitation programs in the area of juvenile delinquency and programs to improve the juvenile justice system.

Juvenile Justice and Delinquency Prevention - Special Emphasis (Program Grants and Discretionary Grants)

The purpose of this program is to develop and implement programs that design, test, and demonstrate effective approaches, techniques and methods for preventing and controlling juvenile delinquency, such as: community based-alternatives to institutional confinement; developing and implementing effective means of diverting juveniles from the traditional juvenile justice system; programs stressing advocacy activities aimed at improving services to youth impacted by the juvenile justice system; model programs to strengthen and maintain the family unit including self-help programs; prevention and treatment programs relating to juveniles who commit serious crimes; programs to prevent hate crimes; programs to provide aftercare and reintegration services; and programs to prevent youth gun and gang violence.

National Institute for Juvenile Justice and Delinquency Prevention

The purpose of this program is to encourage, coordinate, and conduct research and evaluation of juvenile justice and delinquency prevention activities; to provide for public and private agencies, institutions, justice system agencies, a clearinghouse and information center for collecting, disseminating, publishing, and distributing information on juvenile delinquency; to conduct national training programs of juvenile related issues, and provide technical assistance and training to Federal, State, and local governments, courts, corrections, law enforcement, probation, public and private agencies, institutions, and individuals, in the planning, establishment, funding, operation, or evaluation of juvenile delinquency programs.

Missing Children's Assistance

The purpose of this program is to: 1) coordinate Federal missing and exploited children activities and to support research, training, technical assistance, and demonstration programs to enhance the overall response to missing children and their families; and 2) establish and maintain a national resource center and clearinghouse dedicated to missing and exploited children issues; 3) conduct national incidence studies to determine the type and extent of missing children in America; 4) support law enforcement demonstration programs (e.g., the Internet Crimes Against Children Task Force Program) to enhance the investigative response to missing and exploited children cases; 5) support research to broaden understanding of a wide range of missing and exploited children issues (e.g., abduction homicide investigation solvability factors), to inform training and technical assistance efforts and to identify promising practices and programs for replication; 6) develop training programs for law enforcement, child protective services, medical personnel, and prosecutors to enhance coordination and effectiveness of missing and exploited children investigations and to enhance the overall system response; 7) identify service gaps and develop programs to meet specialized needs of parents or guardians of children who are reported missing; 8) provide a national central registry and toll-free hotline service to assist community organizations and law enforcement personnel to identify and return adults suffering from Alzheimer's disease who have wandered from home; and 9) provide training, technical assistance, and publications to enhance community wide responses to wandering incidents by memory impaired adults.

Gang-Free Schools and Communities – Community-Based Gang Intervention

The purpose of this program is to: 1) prevent and to reduce the participation of juveniles in the activities of gangs that commit crimes; 2) develop within the juvenile adjudicator and correctional systems new and innovative means to address the problems of juveniles convicted of serious drug-related and gang-related offenses; 3) provide treatment to juveniles who are members of such gangs, including members who are accused of committing a serious crime and members who have been adjudicated as being delinquent; 4) promote the involvement of juveniles in lawful activities in geographical areas in which gangs commit crimes; 5) promote and support, with the cooperation of community-based organizations experienced in providing services to juveniles engaged in gang-related activities and cooperation of local law enforcement agencies, the development of policies and activities in public elementary and secondary schools which will assist such schools in maintaining a safe environment conducive to learning; 6) assist juveniles who are, or may become, members of gangs to obtain appropriate educational instruction, in or outside a regular school program, including the provision of counseling and other services to promote and support the continued participation of such juveniles in such instructional programs; 7) expand the availability of prevention and treatment services relating to the illegal use of controlled substances and controlled substances analogues by juveniles, provided through State and local health and social services agencies; 8) provide services to prevent juveniles from coming into contact with the juvenile justice system again as a result of gang-related activity; 9) provide services at a special location in a school or housing project; and 10) facilitate coordination and cooperation among local education, juvenile justice, employment, and social service agencies; and community-based programs with a proven record of effectively providing intervention services to juvenile gang members for the purpose of reducing the participation of juveniles in illegal gang activities.

Victims of Child Abuse

The purpose of this program is to: 1) develop model technical assistance and training programs to improve the courts' handling of child abuse and neglect cases; 2) facilitate the adoption of laws to protect children against the potential second assault of the courtroom proceeding; 3) address the present situation in which many States have adopted innovative procedures that have far outpaced Federal law, leaving those children who do enter the Federal system inadequately protected; 4) address the inconsistency and disparity among State laws on child abuse; 5) train criminal justice system

personnel on up-to-date, innovative techniques for investigating and prosecuting child abuse cases; 6) promote a multidisciplinary approach to coordinating the investigations and prosecution of child abuse cases and, thereby, limiting the number of pre-trial interviews a child must go through as well as better assure the accuracy of each interview; and 7) increase the number of communities making use of a Children's Advocacy Center approach to the investigation, prosecution and treatment of child abuse cases.

Title V Delinquency Prevention Program

The purpose of this program is to increase the capacity of State and local governments to support the development of more effective prevention programs to improve the juvenile justice system through risk and protective factor focused programming approach.

Part E State Challenge Activities (Challenge Grants)

The purpose of this program is to provide incentives for States participating in the Formula Grants Program to develop, adopt, and approve policies and programs in one or more of ten specified challenge activities to improve the State's juvenile justice system.

Juvenile Mentoring Program (JUMP)

The purpose of this program is to reduce juvenile delinquency and gang participation, improve academic performance, and reduce the dropout rate through the use of mentors for at-risk youth.

Enforcing Underage Drinking Laws Program

The purpose of this program is to support and enhance efforts by States, in cooperation with local jurisdictions, to enforce underage drinking by prohibiting the sale of alcoholic beverages, or the consumption of alcoholic beverages by minors.

Drug Prevention Program

The purpose of this program is to reduce drug use by encouraging the promotion of multiple approaches including replicating the Life Skills Training (drug prevention) program, and educating and motivating young adolescents to pursue healthy lifestyles and fostering interpersonal and decision making skills, which will help them choose alternatives to high risk behaviors.

Drug-Free Communities Support Program Grants

The purpose of this program is to: 1) increase the capacity of community coalitions to reduce substance abuse among youth, and over time, to reduce substance abuse among adults through strengthening collaboration among communities, public, and private entities; and 2) disseminate state-of-the-art information on practices and initiatives that have proven to be effective in reducing substance abuse among youth.

Reduction and Prevention of Children's Exposure to Violence (Safe Start)

The purpose of this program is to develop a demonstration initiative to prevent and reduce the impact of family and community violence on young children (primarily from birth to six years of age) by helping communities to expand existing partnerships between service providers (such as law enforcement, mental health, health, early childhood education and others) to create a comprehensive service delivery system.

Tribal Youth Program

The purpose of this program is to support and enhance tribal efforts for comprehensive delinquency prevention, control, and juvenile justice system improvement for Native American youth.

National Evaluation of the Safe Schools - Healthy Student Initiative

The purpose of this program is to conduct an evaluation of the Safe Schools/Healthy Students Initiative.

BUREAU OF JUSTICE STATISTICS (BJS)

State Justice Statistics Program for Statistical Analysis Centers (SACs)

The purpose of this program is to provide financial and technical assistance to State governments for the establishment and operation of Statistical Analysis Centers (SACs) to collect, analyze, and disseminate justice statistics.

National Criminal History Improvement Program (NCHIP)

The purpose of this program is to: 1) enhance the quality and completeness of the nation's criminal history record systems; 2) provide financial and

technical assistance to States for the establishment or improvement of computerized criminal history record systems and in their efforts to collect data on stalking and domestic violence; 3) improve data accessibility and support data transmissions to the national system which will permit the immediate identification of persons who are prohibited from purchasing firearms, are subject to domestic violence protective orders, or are ineligible to hold positions of responsibility involving children, the elderly, or the disabled; 4) support the development of accurate and complete State sex offender identification and registration systems which interface with the FBI's Sex Offender Registry and meet applicable Federal and State requirements; 5) develop and improve the processes for identifying, classifying, collecting, and entering data regarding stalking and domestic violence into local, State, and national crime information databases; and 6) ensure that criminal justice systems are designed, implemented or upgraded to be compliant where applicable, with the FBI operated National Instant Criminal Background Check System and Interstate Automated Fingerprint Identification System, meet other applicable statewide or regional criminal justice information sharing standards and plans, and build upon ongoing efforts so as to support the wide range of technology based, criminal justice information, identification, and communications needs identified by the States.

National Incident Based Reporting System (NIBRS)

The purpose of this program is to allow State and local jurisdictions to capture detailed offense, offender, victim, property, and arrest information. NIBRS moves beyond aggregate statistics and raw counts of crimes and arrests that comprise the summary Uniform Crime Reports program to individual records for each reported crime incident and its associated arrest.

NATIONAL INSTITUTE OF JUSTICE (NIJ)

Justice Research, Evaluation, and Development Project Grants

The purpose of this program is to encourage and support research, development, and evaluation to further understanding of the causes and correlates of crime and violence, methods of crime prevention and control, and criminal justice system responses to crime and violence and contribute to the improvement of the criminal justice system and its responses to crime, violence and delinquency.

National Institute of Justice Visiting Fellowships

The purpose of this program is to provide opportunities for experienced criminal justice practitioners and researchers to pursue projects aimed at improved understanding of crime, delinquency and criminal justice administration by sponsoring research projects of their own creation and design.

Criminal Justice Research and Development - Graduate Research Fellowship Program

The purpose of this program is to improve the quality and quantity of knowledge about crime and the criminal justice system, while, at the same time, helping to increase the number of persons who are qualified to teach in collegiate criminal justice programs, to conduct research related to criminal justice issues, and to perform more effectively within the criminal justice system.

Corrections and Law Enforcement Family Support

The purpose of this program is to: 1) research the effects of stress on law enforcement and correctional personnel and their families and disseminate the findings; 2) identify and evaluate model programs that provide support services to law enforcement correctional personnel and families; 3) provide technical assistance and training programs to develop stress-reduction and family support programs to State and local law enforcement and correctional agencies; 4) collect and disseminate information regarding family support, stress-reduction, and psychological services to State and local law enforcement and correctional organizations and other interested parties; and 5) determine issues to be researched by the Department of Justice and grant recipients.

Crime Laboratory Improvement-Combined Offender DNA Index System Backlog Reduction

The purpose of this program is to increase the capabilities and capacity of State and local crime laboratories in the United States to conduct state-of-the-art forensic evidence testing and to reduce the backlog of convicted offender deoxyribonucleic acid (DNA) samples.

National Institute of Justice Domestic Anti-Terrorism Technology Development Program

The purpose of this program is to support the development of counter terrorism technologies, assist in the development of standards for those technologies, and work with State and local jurisdictions to identify particular areas of vulnerability to terrorist acts and be better prepared to respond if such acts occur.

BUREAU OF JUSTICE ASSISTANCE (BJA)

Public Safety Officers' Benefits Program

The purpose of this program is to provide a death benefit to: 1) eligible survivors of Federal, State or local public safety officers whose death is the direct and proximate result of a personal (traumatic) injury sustained in the line of duty, and 2) public safety officers who have been permanently and totally disabled as the direct result of a catastrophic personal injury sustained in the line of duty.

Emergency Federal Law Enforcement Assistance

The purpose of this program is to provide necessary assistance to a State government in order to provide an adequate response to an uncommon situation which requires law enforcement, which is or threatens to become of serious or epidemic proportions, and with respect to which State and local resources are inadequate to protect the lives and property of citizens, or to enforce the criminal law.

Federal Surplus Property Transfer Program

The purpose of this program is to transfer or convey to State and local governments and territories, at no cost, surplus real and related personal property determined by the Attorney General to be required for correctional facility or law enforcement use for programs or projects for the care or rehabilitation of criminal offenders, as approved by the Attorney General.

Byrne Formula Grant Program

The purpose of this program is to reduce and prevent illegal drug activity, crime, and violence and to improve the functioning of the criminal justice system.

Edward Byrne Memorial State and Local Law Enforcement Assistance Discretionary Grants Program (Discretionary Drug and Criminal Justice Assistance Program)

The purpose of this program is to provide leadership and direction in controlling the use and availability of illegal drugs and to improve the functioning of the criminal justice system, with emphasis on violent crime and serious offenders.

Local Law Enforcement Block Grants Program

The purpose of this program is to provide funds to units of local government for the purposes of reducing crime and improving public safety. Funds may be used for one or more of seven program purpose areas. Funds or a portion of funds may also be used to contract with private, nonprofit entities or community-based organizations to carry out the purposes of this Block Grants Program. BJA will also make awards to States based on the allocation formula specified in the applicable legislation.

Motor Vehicle Theft Protection Act Program (Watch Your Car)

The purpose of this program is to develop, in cooperation with the States, a national voluntary motor vehicle theft prevention program. The national "Watch Your Car" program is designed as a cooperative initiative between the States, local governments, and the U.S. Department of Justice, Bureau of Justice Assistance. It allows owners of motor vehicles to voluntarily display a decal or device on their vehicles to alert police that their vehicle is not normally driven between the hours of 1:00 a.m. and 5:00 a.m. Motorists may also choose to display another decal or device to signify their vehicle is not normally driven across or in the proximity of international land borders or ports.

State Identification Systems (SIS) Grant Program

The purpose of this program is to provide Federal assistance to States to establish, develop, update, or upgrade: 1) computerized identification systems that are compatible and integrated with the database of the National Crime Information Center (NCIC) at the FBI; 2) the capability to analyze DNA in a forensic laboratory in ways that are compatible with the combined DNA Identification Systems (CODIS) of the FBI; and 3) automated fingerprint identification systems that are compatible and integrated with the Integrated Automation Fingerprint Identification System (IAFIS) of the FBI.

State Criminal Alien Assistance Program (SCAAP)

The purpose of this program is to provide Federal assistance to States and units of local government incurring costs of incarcerating illegal aliens convicted of one felony or two misdemeanor offenses and to expedite the transfer of custody for certain deportable aliens.

The Bulletproof Vest Partnership Program

The purpose of this program is to protect the lives of law enforcement officers by helping State, local, and tribal law enforcement agencies provide officers with armored vests.

Tribal Court Assistance Program

The purpose of this program is to assist tribal governments in the development, enhancement, and continuing operation of tribal judicial systems, including inter-tribal court systems.

Planning, Implementing, and Enhancing Strategies in Community Prosecution

The purpose of this program is to emphasize the participation of community leaders and residents in developing strategies for public safety with prosecutors and other community justice system officials. The program serves as a mechanism for community participation that allows communities to identify local priorities and engage in problem solving and strategic planning, as well as regular communication between the prosecutor's office and community residents. In addition, the program helps develop a proactive orientation to crime control, emphasizing prevention and enforcement.

Regional Information Sharing Systems Grants (RISS)

The purpose of this program is to enhance the ability of the State and local criminal justice agencies to identify, target, and remove criminal conspiracies and activities that span jurisdictional boundaries. The first objective of the Regional Information Sharing Systems Program (RISS) is to encourage and facilitate the rapid exchange and sharing of information among Federal, State, and local law enforcement agencies pertaining to known or suspected criminals or criminal activity. The second objective is to enhance coordination and communication among agencies that are in pursuit of criminal conspiracies determined to be inter-jurisdictional in nature. In addition, the RISS Program may provide technical and financial resources,

such as specialized equipment, training, and investigative funds, to augment existing multi-jurisdictional enforcement resources and operations.

Closed-Circuit Televising of Child Victims of Abuse (CCTV)

The purpose of this program is to provide equipment and personnel training for the closed circuit televising and videotaping of the testimony of children in criminal proceedings for the violation of laws relating to the abuse of children.

National White Collar Crime Center (NWCCC)

The purpose of this program is to provide a nationwide support system for the prevention, investigation, and prosecution of economic crime. The National White Collar Crime Center (NWCCC) links criminal justice agencies across jurisdictional borders and bridges the gap between local and State criminal justice agency economic crime-fighting capabilities and the minimum threshold for Federal investigation and intervention. The Center provides support for the prevention, investigation, and prosecution of economic crime through a combination of research, training, and investigative support services. The center also hosts the National Cybercrime Training partnership, which provides training to State and Local law enforcement and prosecutorial agencies in how to respond successfully to computer related crime.

Scams Targeting the Elderly

The purpose of this program is to reduce the incidence of fraud and abuse against the elderly through training and technical assistance programs, demonstration sites, public awareness initiatives, and reporting of fraud to the National Fraud Information Center.

State and Local Anti-Terrorism Training (SLATT)

The purpose of this program is to provide delivery of specialized, multiagency anti-terrorism preparedness training. This training, along with related research, law enforcement intelligence, operational issues development, and technical assistance support activities, is delivered to State and local law enforcement and prosecution authorities. While State and local law enforcement preparation and readiness issues addressed in this project are tailored to interventions in domestic terrorism, major portions of the program's preparedness and operational readiness outcomes are equally applicable to any terrorist threat or incident, whether domestically or internationally inspired.

Public Safety Officers' Educational Assistance (PSOEA)

The purpose of this program is to provide financial assistance for higher education to the spouses and children of public safety officers killed in line of duty or who received permanent and totally disabling injuries that occurred on or after October 1, 1997.

OFFICE FOR VICTIMS OF CRIME (OVC)

Crime Victim Assistance

The purpose of this program is to provide compensation and assistance to: 1) residents, who while outside of the U.S. become a victim of a terrorist act or mass violence; 2) eligible State compensation and assistance programs to provide emergency relief, including crisis response efforts, assistance, training, technical assistance for the benefit of victims of terrorist acts or mass violence occurring within the U.S.; and 3) U.S. Attorney's Offices for use in coordination with State victim compensation and assistance efforts in providing emergency relief.

Crime Victim Compensation

The purpose of this program is to provide funds to States for awards of compensation benefits to crime victims.

Crime Victim Assistance/Discretionary Grants

The purpose of this program is to provide funds for: 1) demonstration projects and training and technical assistance services to eligible crime victims assistance programs; 2) financial support of services to victims of Federal crime by eligible crime victim assistance programs; and 3) other support following cases of terrorism or mass violence.

Children's Justice Act Discretionary Grants for Native Americans (Children's Justice Act Partnership for Native American Indian Tribes)

The purpose of this program is to assist Native American Indian tribes in developing, establishing, and operating programs designed to improve the handling of child abuse cases, particularly cases of child sexual abuse, in a manner which limits additional trauma to the child victim and improves the investigation and prosecution of cases of child abuse.

CIVIL RIGHTS DIVISION (OCR)

Americans With Disabilities Act (ADA) Technical Assistance Program

The purpose of this program is to ensure that public accommodations and commercial facilities and State and local governments learn of the requirements of Titles II and III of the Americans with Disabilities Act (ADA) and acquire the knowledge needed to comply with these requirements.

Education and Enforcement of the Antidiscrimination Provision of the Immigration and Nationality Act (INA)

The purpose of this program is to educate employers and workers about their rights and responsibilities under the Immigration and Nationality Act (INA) in order to prevent employment discrimination based on citizenship status or national origin.

DRUG COURTS PROGRAM OFFICE (DCPO)

Drug Court Discretionary Grant Program (Drug Court Program)

The purpose of this program is to support the establishment and development of drug courts to include those that give special attention to alcohol problems in addition to drugs, for example, driving under the influence or driving while intoxicated drug courts.

CORRECTIONS PROGRAM OFFICE (CPO)

Violent Offender Incarceration and Truth in Sentencing Incentive Grants (Prison Grants)

The purpose of this program is to provide funds to individual States and to States organized as regional compacts to build or expand: 1) correctional facilities to increase the bed capacity for the confinement of violent offenders; 2) temporary or permanent correctional facilities including facilities on military bases, prison barges and boot camps for the confinement of nonviolent offenders for the purpose of freeing prison space for violent offenders; and 3) jails.

Residential Substance Abuse Treatment for State Prisoners (RSAT)

The purpose of this program is to assist States and units of local government in developing and implementing residential substance abuse treatment programs within State and local correctional facilities in which prisoners are

incarcerated for a period of time sufficient to permit substance abuse treatment.

Prevention, Diagnosis, and Treatment of Tuberculosis in Correctional Institutions

The purpose of this program is to assist States, units of local government, and Indian tribal authorities in establishing and operating programs for the prevention, diagnosis, treatment, and follow-up care of tuberculosis among inmates of correctional institutions.

Correctional Grant Program for Indian Tribes

The purpose of this program is to assist Indian tribes with the construction of jails on tribal lands for the incarceration of offenders subject to tribal jurisdiction.

OFFICE ON VIOLENCE AGAINST WOMEN (VAWO)

Legal Assistance for Victims

The purpose of this program is to increase the availability of direct legal services to victims of domestic violence, sexual assault, and stalking in matters arising from the abuse or violence. The goal is to develop innovative, collaborative programs within the legal system that promote victim safety.

Grants to Reduce Violent Crimes Against Women on Campus

The purpose of this program is to encourage institutions of higher education to adopt comprehensive, coordinated responses to violence against women, including sexual assault, stalking, dating, and domestic violence.

Violence Against Women Discretionary Grants for Indian Tribal Governments

The purpose of this program is to assist Indian tribal governments to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women, and to develop and strengthen victim services in cases involving violent crimes against women.

Formula Grants

The purpose of this program is to assist States, Indian tribal governments, tribal courts, State and local courts, and units of local government to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women, and to develop and strengthen victim services in cases involving crimes against women. The Program encourages the development and implementation of effective, victim-centered law enforcement, prosecution, and court strategies to address violent crimes against women and the development and enhancement of victim services in cases involving violent crimes against women.

Rural Domestic Violence and Child Victimization Enforcement Grant Program

The purpose of this program is to: 1) implement, expand, and establish cooperative efforts and projects between law enforcement officers, prosecutors, victim advocacy groups, and other related parties to investigate and prosecute incidents of domestic violence, dating violence and child abuse; 2) provide treatment, counseling and assistance to victims of domestic violence, dating violence and child victimization, including in immigration matters; and 3) work in cooperation with the community to develop education and prevention strategies directed toward such issues.

Grants to Encourage Arrest Policies and Enforcement of Protection Orders

The purpose of this program is to: 1) implement mandatory arrest or proarrest programs and policies in police departments, including mandatory arrest programs and policies for protection order violations, as part of a coordinated community response to domestic violence; 2) develop policies, educational programs, and training programs in police departments to improve tracking of cases involving domestic violence and dating violence; 3) centralize and coordinate police enforcement, prosecution, probation, parole and/or judicial responsibility for domestic violence cases in groups or units of police officers, prosecutors, probation and parole officers, or judges; 4) coordinate computer tracking systems to ensure communication between police, prosecutors, parole and probation officers and both criminal and family courts; 5) strengthen legal advocacy service programs for victims of domestic violence and dating violence, including strengthening assistance to such victims in immigration matters; 6) educate judges in criminal and other courts about domestic violence and to improve judicial handling of such cases; 7) provide technical assistance and computer and other equipment to police departments, prosecutors, courts, and tribal jurisdictions to facilitate

the widespread enforcement of protection orders, including interstate enforcement, enforcement between States and tribal jurisdictions, and enforcement between tribal jurisdictions; and 8) develop or strengthen policies and training for police, prosecutors, and the judiciary in recognizing, investigating, and prosecuting instances of domestic violence and sexual assault against older individuals and individuals with disabilities.

Managing Released Sex Offenders

The purpose of this program is to establish criteria and provide training and technical assistance on case management, supervision, and relapse prevention to assist probation and parole officers and other criminal justice practitioners who interact with released sex offenders.

EXECUTIVE OFFICE FOR WEED AND SEED (EOWS)

Executive Office for Weed and Seed (Weed and Seed Program)

The purpose of this program is to implement nationwide a comprehensive, multi-disciplinary approach to combating violent crime, drug use, and gang activity in high crime neighborhoods. The goal is to "weed out" violence and drug activity in high crime neighborhoods, and then to "seed" the sites with a wide range of crime and drug prevention programs, human service resources, and neighborhood restoration activities to prevent crime from reoccurring. The strategy emphasizes the importance of a coordinated approach, bringing together Federal, State and local government, the community, and the private sector to form a partnership to create a safe, drug-free environment.

OFFICE FOR DOMESTIC PREPAREDNESS (ODP)

State Domestic Preparedness Equipment Support Program

The purpose of this program is to provide funds to plan for and execute a comprehensive threat and needs assessment, to develop a 3-year plan to enhance first responder capabilities, and to provide for equipment purchases and the provision of specialized training.

State and Local Domestic Preparedness Training Program

The purpose of this program is to provide training to State and local jurisdictions to respond to Weapons of Mass Destruction (WMD) domestic terrorist incidents involving nuclear, biological, chemical, and explosive devices.

State and Local Domestic Preparedness Exercise Support

The purpose of this program is to provide exercise planning to State and local jurisdictions and to conduct national, State, and local exercises for response to WMD domestic terrorist incidents involving nuclear, biological, chemical, and explosive devices.

State and Local Domestic Preparedness Technical Assistance

The purpose of this program is to provide direct assistance to State and local jurisdictions in enhancing their capacity and preparedness to respond to WMD domestic terrorist incidents involving nuclear, biological, chemical, and explosive devices. The program goals are to enhance the ability of State and local jurisdictions to develop, plan, and implement a program for WMD preparedness and to sustain and maintain specialized equipment.

Local Firefighting and Emergency Services Training

The purpose of this program is to provide specialized training and equipment to enhance the capability of metropolitan fire and emergency service departments to respond to terrorist attacks, and fund demonstration sites in urban communities where innovative fire and emergency services training programs may be replicated in other communities.

OFFICE OF THE POLICE CORPS AND LAW ENFORCEMENT EDUCATION (OPCLEE)

Police Corps and Law Enforcement Officers Training and Education

The purpose of this program is to address violent crime by increasing the number of police with advanced education assigned to community patrol in areas of great need, and to provide educational assistance to students who possess a sincere interest in public service through law enforcement and to law enforcement personnel. This program also offers no-obligation college scholarships to children of law enforcement officers killed in the line of duty.

APPENDIX 3

DESCRIPTION OF COMMUNITY POLICING GRANTS AWARDED BY THE OFFICE OF COMMUNITY ORIENTED POLICING SERVICES

Advancing Community Policing (ACP). This program began in FY 1997 and was designed to help law enforcement agencies align their systems and processes to be more consistent with their organizational values and further their primary mission to increase public safety, reduce crime, and solve crime problems. The grants funded innovations at all levels of recipient organizations that worked to change the traditional, response-oriented culture to one that values the partnerships and analysis that result in tailored interventions.

Anti-Gang Initiatives. This program began in FY 1996 and was designed to bring effective community policing strategies to the front line in the battle against gangs.

Accelerated Hiring, Education, and Deployment (AHEAD). This program was open to law enforcement agencies serving populations of more than 150,000. Applicants were required to submit a "Letter of Intent to Participate" to the Office of Community Oriented Policing Services (COPS) providing information regarding the number of officers requested through this grant program. The AHEAD program was designed to provide funding directly to local, State, and tribal jurisdictions for officers engaged in community policing. The grants were to provide State funding for 75 percent of a newly hired entry-level officer's salary and benefits, up to a maximum amount of \$75,000 per officer, over the course of the three-year grant period. This program was merged into the Universal Hiring Program in 1995.

COPS in Schools (CIS). This program was developed for law enforcement agencies that were eligible to apply for funding through a Universal Hiring Program grant. The CIS program is designed to fund the hiring of community policing officers to work in school. The maximum award per officer is \$125,000 with any remainder to be paid with State or local funds.

Distressed Neighborhoods Pilot Project (DNP). This was a 1998 program that funded projects in cities with higher crime rates, poverty, and unemployment. The targeted cities received Universal Hiring Program grants with full waivers of COPS's local funding match requirements.

Community Policing to Combat Domestic Violence (DV). This was a 1996 program that funded innovative community policing efforts to curb domestic violence by developing partnerships between law enforcement agencies and community organizations.

Evaluation and Research Grants. This program was designed to fund policing agencies, universities, and criminal justice facilities to evaluate community policing and conduct research that relates to the field.

Funding Accelerated for Smaller Towns (FAST). This program was developed by COPS, as directed by Congress, to simplify the application process to be used by jurisdictions serving populations under 150,000. Agencies were required to submit a one-page application form to apply for a grant. The FAST program was designed to provide funding directly to local, State, and tribal jurisdictions for officers engaged in community policing. The grants were to provide State funding for 75 percent of a newly hired entry-level officer's salary and benefits, up to a maximum amount of \$75,000 per officer, over the course of the three-year grant period. This program was merged into the Universal Hiring Program in 1995.

Hiring in the Spirit of Service. This program began in FY 2000 and explores changes in how law enforcement officers are recruited and hired.

Police Integrity Training Initiative (INTEGRITY). This program began in FY 1997 and provides innovative community policing training to communities, local governments, and law enforcement professionals.

Justice Based After-School Program (JBAS). This program began in FY 2000 and is a pilot program in six cities to develop a preventive approach to juvenile crime and victimization to improve overall quality of life in high-crime neighborhoods.

Methamphetamine Grants (METH). This program began in FY 1998 to help local law enforcement agencies and task forces develop innovative community policing responses to problems related to methamphetamine production and use.

Making Officer Redeployment Effective (MORE). This program was developed for all law enforcement agencies, regardless of the population size of the jurisdiction. The program is intended to expand the amount of time current law enforcement officers can spend on community policing by funding technology, equipment, and support staff, including civilian personnel. Grants have been awarded for up to 75 percent of the cost of equipment and technology, support resources (including civilian personnel),

or to pay overtime.¹⁵ For each \$25,000 in State funds received, agencies are to redeploy the equivalent of one full-time officer.

Phase I. This program began in FY 1995 and was the initial program to hire police officers under the Violent Crime Control and Law Enforcement Act of 1994. Awards were made to applicants not funded under the Police Hiring Supplement program, a 1993 grant program to fund the hiring of police officers that was administered by the Office of Justice Programs, Bureau of Justice Assistance. The awards funded up to 75 percent of the total salary and benefits of each officer awarded over three years, up to a maximum of \$75,000 per officer or 50 percent of the total salary and benefit costs. Grants are no longer awarded under this program.

Problem-Solving Partnerships (PSP). This was a 1996 program that funded partnership development between local law enforcement agencies and community organizations to address persistent crime and disorder problems.

Regional Community Policing Institutes (RCPI). This program began in FY 1997 and is a national network of institutes that provide innovative community policing training and technical assistance to law enforcement agencies and community members.

School Based Partnerships (SBP). This was a 1998 and 1999 program that helped policing agencies work with schools and community-based organizations to address persistent school-related crime problems.

Secure Our Schools (SOS). This program provides up to 50 percent of the total cost for municipalities to install metal detectors, locks, lighting, and other equipment to help deter crime in schools. The grants can also be used to pay half of the cost of security assessments, security training, and any other measure that will provide a significant improvement in security at schools.

Small Community Grant Program (SCGP). This program was developed for communities of less than 50,000 to supplement Phase I, FAST, or Universal Hiring Program grants by paying for a portion of the fourth-year salaries and benefits of existing COPS-funded officers. These one-time grants are specifically for the retention of COPS-funded police officer positions.

¹⁵ Use of overtime was unallowable for grants after fiscal year 1995.

Technology Grants (TECH). This program began in FY 1998 and funds projects to develop technologies that will advance community policing and help fight crime.

Tribal Mental Health Community Safety Initiative (TMHCSI). This was a 2000 program designed to make tribal communities safer and healthier by funding training, equipment, technology, as well as by hiring additional community policing or school resource officers.

Tribal Resources Grant Program (TRGP). This program began in FY 1999 and is designed to help tribal law enforcement agencies fund training and equipment for new and existing officers as well as salary and benefits for new community policing officers.

Troops to COPS (TROOPS). This was a 1995 and 1999 joint program with the Department of Defense to provide incentives for COPS grantees to hire recently separated members of the armed forces. TROOPS provided up to \$5,000 per officer to train former members of the United States armed forces to work in local law enforcement.

Universal Hiring Program (UHP). This program was developed for all law enforcement agencies, regardless of the population size of the jurisdiction. UHP grants were designed to provide funding directly to local, State, and tribal jurisdictions for officers engaged in community policing. The grants provide State funding for 75 percent of a newly hired entry-level officer's salary and benefits, up to a maximum amount of \$75,000 per officer, over the course of the three-year grant period.

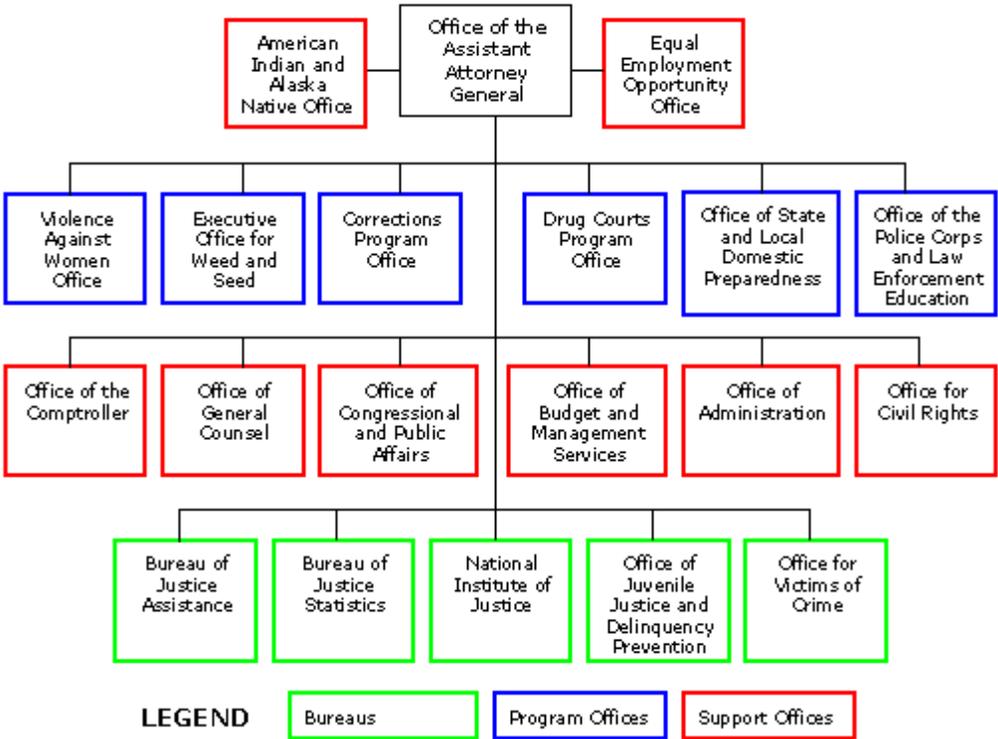
Value Based Initiatives (VBI). This program began in FY 2000 and strives to improve the quality of life in various jurisdictions by helping build partnerships between law enforcement agencies and other organizations serving their communities.

Youth Firearms Violence Initiative (YFVI). This was a 1995 program that funded innovative community policing efforts to curb the rise in violence associated with young people and firearms.

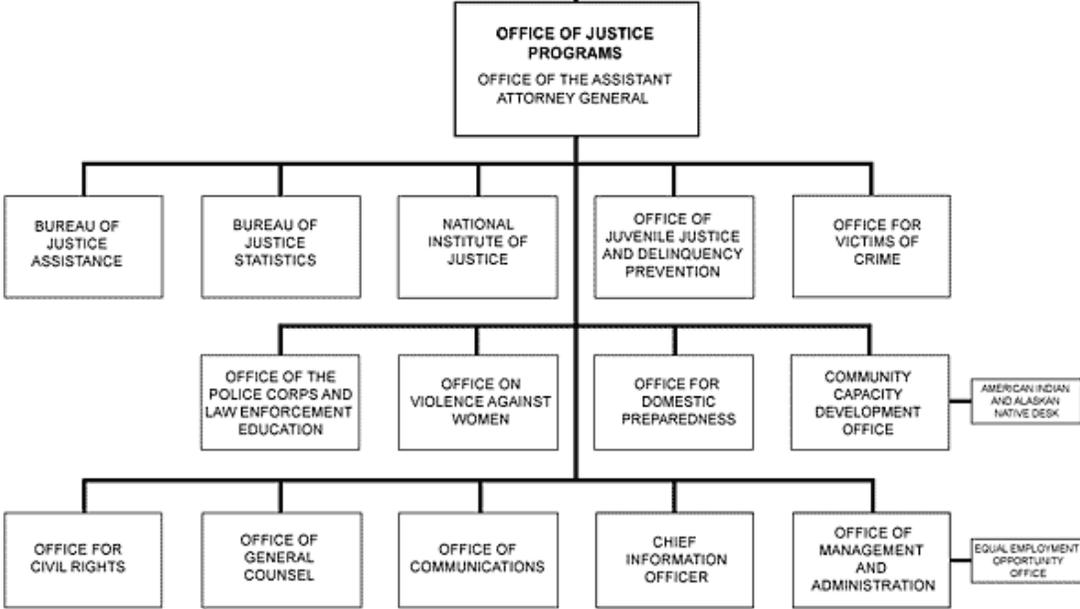
311. This was a 1996 and 1998 program that provided funds for establishing a 311 phone number system nationwide as a non-emergency number. This new number was designed to eliminate the dependence on the 911 system for non-emergencies.

OFFICE OF JUSTICE PROGRAMS' ORGANIZATION CHARTS BEFORE AND AFTER REORGANIZATION

Pre-Reorganization



Post-Reorganization



Source: OJP

APPENDIX 5**DESCRIPTION OF AUTOMATED APPLICATION SYSTEMS
USED BY THE OFFICE OF JUSTICE PROGRAMS**

System Name	System Description
AltaScan Fingerprint Scanning System	This application is designed for the Office of Administration's Human Resources office to transmit fingerprints of new employees to the Federal Bureau of Investigation for fingerprint verification.
Atomic	This system was replaced by the Integrated Financial Management Information System (IFMIS) in FY 1998 but is still used weekly by the Office of the Comptroller to research or reconcile payments.
Audit Tracking System (ATS)	This system maintains information concerning grantee annual reports and audit findings/resolution. This system is scheduled for elimination since the Office of Justice Programs (OJP) can now rely on data from the Federal Audit Clearinghouse system.
Automated Standard Application for Payment (ASAP)	This system is an online, real-time, paperless payment system for OJP grantees. This system will replace the Letter of Credit Electronic Certification System (LOCES).
Award and Finance System (AWARDFIN)	This system maintains information such as grantee contact, phone number, project dates, Catalog of Federal Domestic Assistance codes, supplement tracking, fund codes, and other information used for reporting purposes.
Award Book Tracking System	This system generates Redbook forms and tracks what was printed on these forms.
Bullet Proof Vest	This is an electronic, Internet-based system for applications and payment requests for the Bullet Proof Vests Grants Act of 1998 program.
Bureau of Justice Assistance (BJA) Application Tracking System for Windows	The BJA system for tracking grant applications.
Bureau of Justice Statistics (BJS) Accounting	This system tracks program and administrative funds expended within the BJS.

BJS Application Tracking System	The BJS system for tracking grant applications.
Configuration Management Tool (CMT)	This system controls, monitors, and checks configuration changes, software development, and code releases.
Office of Community Oriented Policing Services (COPS) Award Tracking System	This system tracks all COPS awards including all actions taken on each grant. The original intent of this system is obsolete, but the system is still used to access certain information.
COPS FinCap	This system was developed to make the data contained in various OJP developed COPS databases available to the processing analyst in an easy lookup format. The purpose of this system has been eliminated but the system is still used to access certain information.
COPS Vendor Tracking System	This system tracks all COPS vendor information such as vendor name, legal names, addresses, and various codes defining the vendor as a member of various classes and provided updates of this information to the Atomic system prior to December 15, 1998. The intent of this system is obsolete but it is still used to access certain information.
Corrections Reporting System	This is a subaward reporting system for newly developed Violent Offender Incarceration/Truth in Sentencing (VOITIS) and Residential Substance Abuse Treatment (RSAT) grants.
Correspondence Tracking System	This system is used by the Office of Budget and Management Services Executive Secretariat staff to control and track the flow of executive correspondence throughout OJP. The bureaus and offices have limited access to this system.
Crime Act Support Division (CASD) Application Tracking System	The CASD's system for tracking grant applications.
Defense Procurement Fraud Debarment System (DPFD)	This system tracks information concerning those convicted of committing fraud against the Department of defense through a government contract.
DPFD Mass Fax System	This system is used to send large numbers of faxes to the United States Attorneys.
Denial of Federal	This system tracks claims for those who have been

Benefits (DFB) System Version 2.0 for DOS	denied Federal benefits.
Department's Address Book-Address Import	This system imports the electronic mail addresses of users from various departments outside of OJP into the Department Address Book Database.
Executive Information System (EIS)	This system is accessible through the internet by OJP executives to obtain information about OJP projects to include scheduled costs, risks, personnel, and project milestones.
Financial Monitoring Tracking System (FMTS)	This system contains data relevant to all grants monitored by the Office of the Comptroller, including date of review, list of findings, and electronic copy of the site visit report.
Forms Package	This system produces forms for the award kits, including the award form, award continuation sheet, special conditions, and the project summary and grant adjustment notice form.
Grant Adjustment Notice (GAN) Tracking System	This system is used to process GANs.
Grants Management System (GMS)	This system is used to track OJP grants from application through grant award.
Integrated Financial Management Information System (IFMIS)	This is the Office of the Comptroller's financial system that includes the financial status report data for grantees.
Interior Department Electronic Acquisition System-Procurement Desktop (IDEAS-PD)	This system automates and streamlines the procurement process by allowing users to enter requisitions online; create, update, and modify requisitions and purchase orders; and perform pre-award and contract administration activities.
LOCES Payment System Dial-In	The LOCES is used to capture payment requests of grantees, approve or deny requests and create payments by uploading the requests to the Department of the Treasury. The LOCES system has two modules. A front-end module captures the requests from users who dial in using a modem. A back end module processes the requests.

Local Law Enforcement Block Grant (LLEBG) Award Kit	This system was developed for BJA to manage the LLEBG grant award process, which includes the printing of award kits, maintaining award data, and reviewing the award life cycle.
LLEBG 1996 Award Kit System	Same as the LLEBG Award Kit description
LLEBG Award Kit 1997-1998	Same as the LLEBG Award Kit description
LLEBG Grants Binder	This system performs the same function as the OJP Grants Binder system.
LLEBG Progress Reporting Quality Control System	This system was developed to allow BJA staff to locate, view, edit, or print grant award progress reports and any associated project information forms that are submitted by LLEBG grantees.
LLEBG Quality Control System	This system was developed for the BJA to allow LLEBG grant managers and supervisors to view and edit LLEBG grant application records and generate status reports.
LOCES Forms Package	This system was developed for OJP staff to produce OJP Admin Forms 7182/3.
National Electronic Injury Surveillance	This system maintains data on injuries.
National Institute of Justice (NIJ) Automated Tracking System (ATMS – Automated Tracking Management System)	This system tracks awards in detail to provide the NIJ with access to hundreds of data points about the life cycle of all NIJ grants, cooperative agreements, inter-agency authorizations, and interagency reimbursable agreements.
NIJ Application Tracking System	The NIJ's system for tracking grant applications.
NIJ Export System	This system exports grant application information to contractors for the purpose of reviewing the applications, producing letters and other output, and providing recommendations as to whether applications should be approved.
The Office of Juvenile Justice and Delinquency Prevention (OJJDP) Application Tracking System	OJJDP's system for tracking grant applications for discretionary grants.
OJJDP Application Tracking System (Formula)	OJJDP's system for tracking grant applications for formula grants.

OJJDP Subgrant System (Reporting System)	This system is used by OJJDP to update and track information for OJJDP's Formula Grant Subawards table.
OJP Correspondence Tracking System	This system is designed to help OJP staff track the flow of correspondence from point of origin to point of destination both inside each bureau and office and across the entire organization.
OJP FinCap	This system was developed for OJP staff to view several databases that track the award distribution process. It contains information about subgrants and vendors.
OJP Grants Binder	This system contains scanned images of grant information such as grant award information and grant applications. The system is read-only but users can make virtual annotations, such as sticky notes, and can highlight text on the scanned images.
OJP Telecommunications Database	This system is a compilation of databases, consisting of the address book, telecommunications equipment database, and internal telephone directory.
OJP Vendor Tracking System	This system was developed to maintain and track OJP vendor information. The original intent of this system is obsolete but the system is still used to access certain information.
Office of Victims of Crime (OVC) Application Tracking System	The OVC system for tracking grant applications.
OVC Assistance	This system records annual performance reports from Victim Assistance grantees and is used for an audit trail and reconciliation.
OVC Compensation Tracking System	This system records annual performance reports from victim compensation grantees.
OVC HyperText Markup Language (HTML) Creator	This system creates HTML files for State grantee information from the OVC Subgrant system to be posted on the OVC OJP web page.
OVC Subgrant (HQ)	This is an internal system used by OVC to view data for Victims of Crime Act (VOCA) Reports.
OVC Subgrant System Dial-In System	This is a dial-in system used by Victim Assistance grantees to record data for VOCA Reports.
OVC Training and Admin	This system tracks expenditures by the Victim Assistance grantees for audit trail and reconciliation.

Phone Activated Paperless Request System (PAPRS) System	The PAPRS is a system whereby grantees access their grant fund balances, draw down funds, and transfer funds between grants.
PAPRS Help System (PAPRINFO)	This system enables Office of the Comptroller accountants to determine a variety of information, such as grants assigned to a certain vendor and the correlation with other systems determining payments eligibility.
PAPRS System Data Preparation	This system prepares personal identification numbers and grant ID numbers for the PAPRS system users.
Program Accountability Library (PAL) Application Tracking System	This is the main application tracking system for all OJP grants and is populated by program office application systems and GMS.
PIPELINE (renamed and is now called ATMS)	This system extracts data related to NIJ grants from Control Desk systems.
Property Management Information System (PPMIS)	The PPMIS is used to track and account for capitalized equipment throughout OJP.
Public Safety Offices Benefit (PSOB) (Oracle)	This is the Public Safety Office grant processing system for law enforcement, first responder's death benefits.
RSAT IPR	This is a subaward system for recipients of the RSAT grant.
Standard Form (SF) 269 System	This system was developed for BJA to allow SCAAP grant managers and supervisors to view and edit SCAAP grant application records and generate status reports.
SF269 Tracking System	This system uses a log menu to enter data for the SF269 report. The log menu contains compliance dates for the SF269 and the Categorical Progress reports. This system was replaced by the IFMIS 269 module, but other dates are still maintained in the system. Other systems such as PAPRS and LOCES look to this system for data.
Tackle Box	This is an OJP Intranet system for OJP e-mail, and other information pertinent to OJP.
Travel Manager (FMIS)	This system generates forms for authorization of travel for DOJ employees and payment.
Violence Against Women Act (VAWO) Subgrants Awards	This system is used for Violence Against Women State grantees to compile information about their subgrants.

Victim Assistance in Indian Country	This system is similar to the VOCA Reports system except that it is limited to native American grantees.
VOCA Reports	This system generates internal reports on data submitted by grantees about their subgrantees' use of funds. The reports are used for audit compliance and to track the effectiveness of money distributed to victims.
VOITIS IPR	This is a subaward system for recipients of VOITIS grants.
WebFocus	This system allows access to mainframe legacy databases housed at the Rockville Data Center.

OFFICE OF JUSTICE PROGRAMS' RESPONSE
TO THE DRAFT AUDIT REPORT



U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

JUN 9 0 2003

MEMORANDUM TO: Guy K. Zimmerman
Assistant Inspector General for Audit
Office of the Inspector General

FROM: Deborah J. Daniels *(Signature)*
Assistant Attorney General

SUBJECT: Draft Audit Report on Streamlining of Administrative Activities
and Federal Financial Assistance Functions in the Office of Justice
Programs and the Office of Community Oriented Policing Services

This memorandum responds to report recommendations directed to the Office of Justice Programs (OJP) for action, included in the above-referenced Office of the Inspector General (OIG) draft audit report. The draft report contains eight recommendations; however, only Recommendations 1 and 3 through 8 are applicable to OJP. For ease of review, the seven recommendations pertaining to OJP are restated in bold, followed by our response to the recommendation.

- 1. Develop and implement a method of coordination [with the Office of Community Oriented Policing Services] to identify proposed programs and grants that have similar purposes and eliminate any duplication of effort to ensure that awards are not made to the same grantee for similar purposes.***

We agree with the recommendation. The OJP and the Office of Community Oriented Policing Services (COPS) will coordinate and exchange information on program purposes at the beginning of each fiscal year. If potential duplication is identified, OJP and COPS will coordinate, as appropriate, to ensure that duplication does not occur.

- 3. Continue efforts to implement OJP's current reorganization plan.***

We agree with the recommendation. In 2001, we began reorganization and streamlining through a two-phase reorganization plan. We have merged the programs and staffs of the Corrections Program Office and the Drug Courts Program Office into the Bureau of Justice Assistance. This merger consolidated overlapping functions, reduced management redundancy, and improved coordination and communication. We have also

created the Office of the Chief Information Officer (OCIO) in recognition of the importance of mission-critical systems and the need for an agency-wide grants management system and management information system. In addition, we merged the Office of Congressional and Public Affairs and other information dissemination functions into one office.

In the near future, OJP will move forward to consolidate several administrative and support functions into the Office of Management and Administration. We will also merge the programs, functions, and staff of the Executive Office for Weed and Seed and the American Indian/Alaska Native Affairs Desk into the Community Capacity Development Office. Collectively, these action actions will move OJP toward greater centralization of management and improved communication and coordination across organizations and programs.

4. ***Identify all the overlapping programs that will still exist after the reorganization is implemented and develop plans to either reorganize the overlapping programs or strengthen the communication between the overlapping programs to eliminate the duplication.***

We agree with the recommendation. The Office of Justice Programs has embarked upon a multi-year effort to improve the way we accomplish our mission and serve our customers. To guide our improvement efforts we developed a comprehensive Management Plan that identifies and schedules our major change initiatives. One of our major performance improvement goals is to efficiently manage resources to ensure accountability across OJP and consistency with national policy goals. One of the strategies we have developed to enable us to achieve that goal is to develop internal mechanisms to collaborate in targeting resources to maximize impact. We will investigate the need for better internal collaboration, and establish more formal, organized methods to collaborate in areas of need. Recent OJP accomplishments to improve internal collaboration:

1. Collaboration is becoming the standard among bureaus and programs as we work to exchange program strategies and simplify our processes and reduce burden.
2. By reorganizing we are now able to provide better information on best practices and service for national training and technical assistance grants.
3. The senior leadership team meets regularly to coordinate policy and share information concerning cross OJP issues.
4. Senior managers meet regularly to discuss improvements to OJP operations and administrative services.

5. ***Monitor the progress of efforts to fully automate the "Redbook" process and ensure that the process is fully automated by the end of calendar year 2003 as planned.***

We agree with the recommendation. We are on track for fully implementing the Grants Management System (GMS) Build-Out program by the end of December 2003. The

GMS Build-Out program will fully automate the OJP "Redbook" process from solicitation to close-out.

6. ***Monitor the progress of actions to implement the consultant's recommendation to integrate the current GMS system with modules that would expand the system to manage grants from beginning to end, and ensure that the expanded system is fully implemented by the end of calendar year 2003 as planned.***

We agree with the recommendation. We are on track for implementing by the end of December 2003, an enhanced GMS system with modules that would expand the system to manage grants from beginning to end.

7. ***Monitor the progress of actions to identify and eliminate automated systems which perform duplicative functions or contain duplicative data, and ensure the duplicative systems are eliminated by the end of FY 2003 as planned.***

We agree with the recommendation. We are on track for eliminating duplicative systems by the end of December 2003. In coordination with the GMS Build-Out, the OCIO initiated the Legacy Brown-Out program to eliminate overlapping or duplicative existing automated systems after each phase of the GMS Build-Out program is implemented.

8. ***Monitor the bureaus to ensure they use the GMS system to enable grantees to submit grant applications online for all bureau grant programs.***

We agree with the recommendation. All OJP bureaus and program offices were mandated to use GMS for all grant solicitations and awards opened or announced after January 31, 2003, except for awards made under the State Criminal Alien Assistance program (SCAAP) and the Local Law Enforcement Block Grant (LLEBG) program. The SCAAP and LLEBG programs are already considered a part of OJP's electronic grant management system.

We appreciate the opportunity to provide comments to the draft report. If you have any questions about this response, please feel free to contact me on (202) 307-5933, or LeToya Johnson, OJP Audit Liaison, on (202) 514-0692.

cc: Tracy A. Henke
Principal Deputy Assistant Attorney General

Cynthia J. Schwimer
Comptroller

Gary N. Silver, Director
Office of Administration

Kim Orben, Acting Director
Office of Budget and Management Services

David L. Zeppieri
Chief Information Officer

LeToya A. Johnson, Audit Liaison
Office of Justice Programs

Vickie L. Sloan, Audit Liaison
Department of Justice

Executive Secretariat
Control Number 20031161

OFFICE OF COMMUNITY ORIENTED POLICING SERVICES'
RESPONSE TO THE DRAFT REPORT



U.S. Department of Justice

Office of Community Oriented Policing Services (COPS)

MEMORANDUM

VIA FACSIMILE and U.S. MAIL

To: Guy K. Zimmerman
Assistant Inspector General
for Audit
Office of the Inspector General

From: Carl Peed 
Director
Office of Community Oriented Policing Services

Date: June 27, 2003

Subject: Draft Audit Report on Streamlining of Administrative Activities and Federal
Financial Assistance Functions in the Office of Justice Programs
and the Office of Community Oriented Policing Services

This memorandum is in response to the Office of the Inspector General's (OIG) above-referenced draft audit report dated May 7, 2003. The COPS Office thanks the OIG for the opportunity to respond to the auditors' recommendations.

I. Introduction

Since January 2002, the OIG has conducted an audit that included a detailed review of the grant functions and administrative activities of each of the COPS Office's divisions. The purpose of the audit was to determine if operational efficiency could be increased by streamlining any such functions and activities. After this extensive audit, we are pleased that the OIG found no overlap or inefficiencies within the COPS Office pertaining to our organizational structure, grant programs and administrative activities. Moreover, the OIG acknowledges the COPS Office's comprehensive automated grant management system that can be used to track all phases of the grant process, from application through closeout. Indeed, the draft audit report confirms what we hear anecdotally on a daily basis – that the COPS Office is an efficient, streamlined, customer-oriented operation that quickly responds to emerging issues faced by state, local and tribal law enforcement agencies across the nation.

Since its creation in 1994, the COPS Office has provided assistance to nearly 13,000 of the nation's approximately 18,000 law enforcement agencies to implement community policing, through awards of nearly 35,000 grants. The COPS Office has invested \$9.6 billion to add officers to the nation's streets and schools, enhance crime-fighting technology, support crime prevention initiatives, and provide training and technical assistance, an investment that has had a real effect on communities across America. We welcome the OIG's observations about how our operations could be even better. The draft audit report makes only two recommendations: first, for the COPS Office and OJP to develop and implement a method of coordination to eliminate potential duplication of effort in awards made to the same grantee for similar purposes, and, second, to continue developing our on-line grant application capabilities.

However, while overall the draft audit report reflects positively on the COPS Office, we would like to put certain points raised by the OIG about our programs and our relationship with OJP into context. As discussed in detail below, first, when put in perspective of the overall grant-making responsibilities of the COPS Office, the COPS Office cannot be characterized as continually relying on OJP to perform COPS services. Rather, as shown below, it would be more accurate to say that the COPS Office has accomplished its mission by, in part, collaborating in discrete areas with OJP (as well as with other offices in the Department of Justice and other Federal agencies). Utilizing available, pre-existing resources of other agencies – rather than reinventing the wheel – makes for cost-effective, quick, and maximum use of existing Federal government resources.

Second, OJP's LLEBG program and COPS hiring and technology grants fulfill different, but very complementary, law enforcement needs. Thus, rather than concluding on page v of the draft report that the Department's assistance programs are "fragmented," and result in "reduced efficiency and higher costs," the COPS Office believes that the offices' programs are complementary and have resulted in cost-effective and customer-friendly services, as shown below.

II. The COPS Office's Collaboration With OJP

The draft audit report, pages 7 – 12, indicates that the COPS Office "has continually relied upon OJP to perform services related to the administration of COPS Office activities." The OIG states that such reliance began at the inception of the COPS program, and grew to include both a reimbursable agreement with OJP for certain financial systems and a "pass-through" of certain funds to OJP to administer. It is true that COPS seeks innovative, efficient ways to maximize our resources and achieve our goals. It is also true that this includes utilizing existing resources where appropriate. However, while the use of certain aspects of OJP's existing structure has contributed to the COPS Office's ability to successfully reach our goals, OJP's assistance should be put in context of the COPS Office's extensive operations.

A. The COPS Office's Initial Grant Programs

On pages 7 – 8 of the draft audit report, the OIG indicates that the COPS Office initially “relied” on OJP to award grants under the COPS program. However, to put OJP’s role in awarding COPS’ initial grants into perspective, two weeks after the COPS Office was created in September 1994, OJP awarded 392 Phase I grants based on applications remaining from OJP’s previous Police Hiring Supplement grant program. Thereafter, within its first *three* months of operation, the COPS Office issued its first grant applications, for the COPS FAST and AHEAD law enforcement hiring programs. Within its first *seven* months of operation, the COPS Office then announced over 7,000 awards in those programs to state, local and tribal law enforcement agencies to hire sworn officers. In the nine years since then, COPS has made over \$9 billion in grants.

This impressive, successful start-up earned the COPS Office’s deserved reputation as an agency that quickly and pro-actively provides Federal assistance in an efficient, customer-oriented manner. OJP’s contribution of 392 grants represented six percent of the 7,000 COPS grants awarded in the program’s first fiscal year, and one percent of the 35,000 grants awarded in total. While an important contribution, when put into perspective, it should not fairly be characterized as OJP performing the COPS Office’s functions for us.

B. The COPS Office's Reimbursable Agreement with OJP

Pages 7 and 8 – 10 of the draft audit report indicate that the COPS Office has “continually turned” to OJP for services related to the COPS program through a reimbursable agreement. However, each year this list of services is reassessed and modified based on any changes implemented by either office.¹ Since the beginning of our program, the utilization of OJP’s services by the COPS Office has decreased.

Currently, most of the services that the COPS Office obtains from OJP can be generally characterized as systems costs and accounting services related to the payment of COPS grant funds. Specifically, when the COPS Office was created, it was determined that using OJP’s grant payment system would be more cost effective than creating a separate system. However, the use of OJP’s payment system, while certainly significant, should be put into perspective with all of the other significant financial activities for which the COPS Office is responsible.

The COPS Office performs all other necessary financial services related to the COPS program, including budget reviews, obligating funds, monitoring the validity of grant obligations, providing nationwide training to grantees in their financial responsibilities, monitoring grantee financial reporting for all active grants, resolving excess cash and local match issues, processing grant withdrawals and closeouts, resolving rejected transactions so that the monthly payment file from OJP can be loaded into the Department’s Financial Management Information System (FMIS), reconciling erroneous grant postings after the file is loaded, obtaining repayments from overpaid grantees, and reclassifying all open grant obligations at the

¹ As the list contained in the draft audit report is outdated, it does not accurately reflect the specific services currently received from OJP.

end of the fiscal year. Furthermore, the COPS Office serves as liaison to the Trust Fund audit, which is a multi-phased annual audit of the COPS Office's financial statements and internal controls.

This use of a reimbursable agreement to obtain a discrete service from another agency is an acceptable practice within the Federal government to encourage the reduction of costs and redundant systems. For example, rather than create costly individual systems, both the COPS Office and the OIG use the Department's pre-existing working capital fund services, a revolving fund used by the Department to finance services provided to Department components on a reimbursable basis. Thus, both the OIG and the COPS Office, in a prudent use of our funds, pay the Department reimbursable fees for such services as accounting, employee drug testing, the use of FMIS, and health unit services.

Likewise, the COPS Office's use of OJP's payment system reduces costs for the taxpayer and inconvenience for the grantees. Portraying the COPS Office's use of OJP's existing payment system as inefficient is antithetical to the intent of the Economy Act, which encourages agencies to use the services of other agencies in order to be more efficient and save costs. It also contradicts the Federal Financial Assistance Streamlining Act, which encourages agencies to simplify, standardize, and streamline grant-making business practices.

C. COPS Funds Passed Through to OJP

On pages 7 and 10 – 12 of the draft audit report, the OIG indicates that the COPS Office transfers portions of its appropriated funds to OJP to administer, and that in most cases OJP assumes full responsibility for the management and administration of these funds. However, almost all of the funds that the COPS Office passes through to OJP are so mandated by Congress in the COPS Office's annual appropriations language, a practice that began in FY 1999.² In FY 2002, the mandatory pass-through funds totaled \$361.9 million. An example of a mandatory pass-through for FY 2002 was the Police Corps program, which was funded at \$14,435,000.³ The appropriation from Congress required that the Police Corps funds be transferred to OJP to administer.

A discretionary way in which the COPS Office passes funds through to OJP to administer is in the category of "earmarks." Earmarks are legislative directives in the appropriations laws that dictate how to spend certain portions of funds appropriated within larger funding programs. However, the practice of passing through discrete earmarks to the other office is mutual, and is done for the purpose of promoting customer service and grantee convenience. The offices (COPS and OJP) pass through earmarked funds to each other when a grant project either

² As of FY 2004, the President's *Budget Submission to Congress* requests that the programs mandated to be passed through to OJP be funded directly in OJP's budget.

³ The Police Corps was created to help address violent crime by increasing the number of officers with advanced education and training who are assigned to community patrol.

continues a project previously administered by the other office, or specifically fits within an existing program of that office.

An example of this type of pass-through by the COPS Office would be specific earmarked grant awards within the Safe Schools Initiative (SSI).⁴ In FY 2002, COPS passed through \$9,531,000 in earmarked funds to OJP for specific SSI projects because OJP had previously administered those projects. Similarly, an example of OJP passing earmarked funds through to the COPS Office would be an award made to Triad, which is a partnership among the American Association of Retired Persons (AARP), the International Association of Chiefs of Police, and the National Sheriffs' Association to help ensure senior safety, including the addressing of domestic violence issues and senior fraud prevention. Another example is the pass-through from OJP to the COPS Office for the South Carolina Law Enforcement Division's establishment of a Computer Crimes Center to provide South Carolina with a single clearinghouse for reporting, training, investigative assistance, and prosecution of high technology crimes. In FY 2003, these two OJP pass-throughs of funding to the COPS Office totaled over \$4.2 million. In each of these cases, the result is that the grantee now has seamless administration of its Federal assistance and one-stop grant administration for that project.

The COPS Office also provides funds to OJP in situations that we would not categorize as OJP administration of COPS funds. Rather, the projects are jointly managed and funded by both the COPS Office and OJP. An example is the \$2 million contribution to support the Comprehensive Indian Resources for Community and Law Enforcement (CIRCLE) program in FY 2001. The CIRCLE program was an initiative in which COPS partnered with OJP to provide comprehensive funding to tribes, designed to empower American Indian communities to more effectively fight crime, violence, and substance abuse. In this manner, both OJP and the COPS Office collaborate and join our resources to address areas of mutual concern and expertise.⁵

D. Comparison of the COPS Office's Costs to Manage and Administer Grants

On pages vi and 12 – 13 of the draft audit report, the OIG finds that the COPS Office's management and administration (M&A) costs per grant administered are lower than those of OJP. However, the OIG also found that our M&A costs per program dollar are higher than those of OJP. The COPS Office was not able to obtain a list of all the factors that the OIG considered to support its calculation, but it appears that the OIG reached its conclusion by comparing the COPS Office's M&A costs in one fiscal year to the amount of COPS grants awarded in that year. Based on this analysis, the OIG calculated that the COPS Office's M&A costs per program dollar were higher than four percent.

⁴ The SSI supports a comprehensive, integrated community-wide approach to promote healthy childhood development and to address the problems of school violence and drug abuse.

⁵ The COPS Office has joined forces in many valuable collaborative partnerships in order to unite the expertise of other Federal agencies to best address a particular law enforcement need. For example, we assist the Drug Enforcement Administration in attacking methamphetamine issues and we partner with the Department of Health and Human Services and the Department of Education to put police in selected schools.

However, the COPS Office believes that the more appropriate calculation would be to compare M&A costs in one fiscal year to the entirety of the work that the COPS Office performs, rather than just choosing to single out one task, such as the amount of grants awarded each year. The COPS Office currently has over \$8 billion in grant awards outstanding, representing over 32,000 grants. We manage, maintain, and monitor that extensive grant portfolio – a significant amount of responsibility – in addition to awarding new grants each year. Thus, while new appropriations of COPS program dollars did decrease from 1999 to 2002, the total cumulative amount of program dollars administered by the COPS Office continues to increase annually. Any calculation of the costs needed to manage our work must take into consideration the totality of our work, and not just the grants we award each year. Based on the comparison of our annual M&A costs to the management of \$8 billion in active grants, the actual percentage of M&A costs per program dollar is less than one-half of one percent – approximately only 0.39 percent.

The OIG appears to assume that personnel costs should decrease if the amount of grant funding awarded each year decreases. While the COPS Office has, in fact, reduced its M&A to program dollar ratio over the years, it would be imprudent for a program managing over \$8 billion in active grants to further reduce personnel costs while continuing to effectively safeguard Federal funds. Even as newly appropriated program dollars have decreased, the increasing workload to maintain active grants, provide adequate customer service, programmatically and financially monitor grants for compliance, and close expired grants eliminates the prudence of further reducing M&A costs.

Furthermore, looking only to the amount of grants awarded in a given year does not take into account the work required for new program implementation and application processing. Regardless of the amount of grants awarded in a given fiscal year, the COPS Office still receives an overwhelming number of applications that must be given substantial review. In FY 2000 alone, COPS awarded \$637.7 million in grant funding, but received more than 5,000 applications requesting funding totaling almost \$994 million. Each application must be thoroughly processed, reviewed, and evaluated to ensure fair funding decisions.

E. Purposes of COPS Grants and OJP Grants

On pages v, viii, and 13 – 15 of the draft audit report, the OIG determines that COPS grants for hiring law enforcement personnel and purchasing equipment and technology and OJP's LLEBG program overlap in purpose. However, in actuality, there are two important distinctions between the two programs.

First, while funds from both COPS and OJP assist state, local, and tribal law enforcement, COPS grants are unique because every grant dollar awarded by the COPS Office must, by statute, be used to advance community oriented policing, a strategy credited with reducing crime and the fear associated with crime and with building trust between law enforcement and citizens. In addition, funds under the COPS Office hiring programs support three years of officer salaries to advance community policing. In contrast, while a grantee can choose to use OJP LLEBG funds to support community policing activities if the grantee so

desires, it is not a requirement that recipients of LLEBG funds must engage in community oriented policing. In addition, LLEBG grants are one-year grants.

Second, potential grantees are selected for awards from different pools, under different funding criteria. OJP LLEBG funds are awarded through the states and are not available to many of the local law enforcement agencies that the COPS Office can fund directly. Specifically, the LLEBG program is a formula program based on a jurisdiction's number of UCR Part I violent crimes reported to the FBI.⁶

In contrast, *all* state, local, federally recognized tribal, and public law enforcement agencies, as well as jurisdictions serving special populations (e.g., transit, university, public housing, schools, and natural resources), are eligible to apply directly to the COPS Office for funding. In addition, jurisdictions wishing to establish new police agencies are eligible to apply for COPS hiring and technology grants.

The OIG provided us with only three situations that it discovered during its audit to support its conclusion that COPS hiring and technology grants and OJP's LLEBG program result in duplication. As set forth below, however, the COPS Office respectfully submits that a closer review of each situation demonstrates that grantees are in fact making complementary use of different funding sources to add to, but not duplicate, the same crucial law enforcement purpose.

1. Orange County, Florida Sheriff's Office: The OIG's draft audit report states that the Sheriff's Office directly received four COPS grants totaling more than \$2.9 million to purchase computers, and also received \$26,142 of OJP LLEBG funds for the purchase of other computers and related accessories. The OIG asserts that this is duplicative. However, the COPS grants were limited in the types of technology that were allowable under the grant, and also required that the purchases result in the redeployment of officers into community oriented policing. In contrast, the \$26,142 in OJP funding (substantially less than the almost \$3 million provided by the COPS Office) was used by the grantee to fund certain additional allowable computer and accessory needs that were specifically unallowable under the COPS grant. Therefore, rather than being duplicative, COPS and OJP funds were effectively used in tandem to address the technology needs of the Sheriff's Office.
2. City of Orlando, Florida: The OIG's draft audit report states that Orlando received a \$14,063 Secure Our Schools (SOS) grant from the COPS Office. SOS grants are used to

⁶ The formula is computed in two stages. In the first stage, state allocations are proportionate to each state's average annual amount of UCR Part I violent crimes compared with that for all other states for the three most recent calendar years of data from the FBI. Each state, however, must receive a minimum award of 0.25 percent of the total amount available for formula distribution under the LLEBG program. In the second stage, local awards are proportionate to each local jurisdiction's average annual amount of UCR Part I violent crimes compared with that for all other local jurisdictions in the state for the three most recent calendar years. Only jurisdictions reporting crime rates above the formula-based threshold of \$10,000 are eligible for direct awards. The difference remaining between the state allocation and the local allocation total is awarded to a state administrative agency (SAA) designated by the Governor. The SAA has the option of distributing award funds to state police departments or units of local government not meeting the formula-based threshold of \$10,000.

establish and enhance a variety of school safety equipment and/or programs. In Orlando's case, the COPS SOS grant funded a particular school safety project, but did not allow for the purchase of certain equipment. Given the fact that the school system supporting Orlando has 150 schools and over 151,000 students, it is not surprising that the city also obtained \$40,000 in OJP LLEBG funding to purchase the safety equipment that was beyond the scope of the COPS-funded project. Again, this example indicates that Orlando's school safety needs went beyond the \$14,063 COPS SOS grant. As such, Orlando used grants from two distinct Department programs to fund related, but not duplicative, school safety efforts.

3. City of Daytona Beach, Florida: The draft audit report states that Daytona Beach received \$475,177 from the COPS Office to hire seven additional officers for three years. Daytona also used \$445,068 in OJP block grant funds received through the state of Florida to hire five officers for one year. In all, Daytona Beach hired twelve new officers with Department funds, with the COPS officer positions funded for three full years of service and the OJP officers funded for one year. Although only the COPS-funded officers were required to engage in community policing activities as a condition of the grant, Daytona voluntarily chose to use the OJP-funded officers to enhance the city's community policing efforts as well. However, these grant awards were not duplicative, as the OJP grant was for only one year and did not require the use of community policing strategies – Daytona instead chose voluntarily to use the OJP-funded officers to enhance its community policing efforts. It is more accurate to observe that Daytona wanted to hire 12 new officers to enhance the City's community policing efforts, and used a combination of COPS and OJP funding to accomplish that goal.

The complementary use of COPS and OJP funding described in the examples above is not at all atypical. According to the *National Evaluation of the COPS Program - Title I of the 1994 Crime Act*, a research report issued by the Urban Institute, grantees use multiple funding streams from both OJP and the COPS Office in a complementary manner in order to implement a local vision of policing. While the OIG states that Congress created what the OIG sees as "duplicative grant programs," the Urban Institute confirms that American law enforcement agencies prefer administering DOJ grants from multiple sources, as opposed to receiving funds from a "monopoly grant program," because of the increased variety of funding options available to address law enforcement needs. The demonstrated success of the separate COPS and OJP grant programs has certainly been recognized.

Nevertheless, prior to this audit the COPS Office already had a practice of informally coordinating with OJP on a variety of other matters. Accordingly, in furtherance of our practice of mutual collaboration and coordination, both offices agree to formalize our coordination by, first, comparing program descriptions as soon as they become available in the fiscal year to identify programs that contain the same allowable uses and, second, if necessary as a result of the first step, ensuring that the relevant program managers from each office coordinate on a case-by-case basis to guarantee that duplicative awards are not made to the same grantee for the same purpose. Both offices are confident that this method for coordination will best allow us to identify at the earliest possible time any potential overlap.

III. Capability to Apply for COPS Grants On-Line

On pages v, viii, 7, and 15, the draft audit report indicates that the COPS Office has not developed a capability for applicants to submit grant applications on-line, and that doing so will streamline the grant application process and make applications available to grant managers more quickly and speed up the approval and award process.

Beginning in 2001, to further enhance customer service and to satisfy the requirements of Public Law 106-107, the COPS Office began using the Internet to streamline the delivery and management of COPS funding to law enforcement. To maximize the benefit of on-line grant functions for COPS grantees, the COPS Office decided to first focus on post-grant award activities. The COPS Office currently manages nearly 32,000 active grants made to nearly 13,000 law enforcement agencies. To best benefit those agencies, the COPS Office first developed on-line options for grant management functions such as submitting progress reports and notifying the COPS Office of changes to a grantee's government and law enforcement executives. By prioritizing post-award functions, the COPS Office first used its on-line capabilities to provide streamlined, efficient grant management tools to the majority of its customers. Indeed, the OIG positively recognized these achievements, stating that "COPS has made several post-award functions available on-line such as allowing grantees to provide information on grant progress using the 'COPS Count' and performing accounting maintenance functions."

With regard to our on-line grant application process, in addition to the customer service benefit of first addressing post-award activity, the COPS Office scheduled the development of its on-line grant application process to best coincide with the government-wide electronic funding application system being developed under the leadership of the Office of Management and Budget (OMB) and the U.S. Department of Health and Human Services (DHHS) E-Grants Program Office. The COPS Office's development of on-line applications is within all legal requirements for E-government activities, such as the P.L. 106-107 initiatives managed by OMB, and is on target for the OMB's implementation of government-wide on-line grant applications. Prior to the initiation of this audit, nearly two years ago the COPS Office created and filled a senior-level E-Grants Program Management Officer position to facilitate all our on-line efforts, including the development of on-line grant applications. In addition, officials of the COPS Office continue to represent COPS on numerous pre-award, post-award and audit oversight working groups in coordination with 26 Federal grant-making agencies to stay abreast of future P.L. 106-107 proposed policy guidelines and streamlining implementation. Among other things, the COPS Office has:

- Submitted comments to OMB in response to a Federal Register notice published April 8, 2003, regarding Standard Data Elements for Federal Grant Applications.
- Posted all COPS Notices of Funding Availability (NOFA) on the E-Grants FIND pilot website administered by the DHHS E-Grants Program Office.

- Prepared a strategic outreach campaign to educate future applicants on the new DUNS number requirement for applying for Federal grants, starting in FY 2004.
- Cross-referenced all of the COPS application kits with the proposed core data elements and developed a list of COPS-specific data elements to submit to the DHHS E-Grants Program Office, in preparation for integration with the Grants.gov portal.

Moreover, to underscore the need to coordinate on-line application efforts, the OMB formally announced the development of a government-wide electronic application system that all Federal grant-making agencies will be required to use once it becomes fully operational. By having focused first on post-award activity, the COPS Office is now in the best position to implement an on-line grant application strategy in cooperation with, and not in duplication of, the various E-grants efforts currently underway government-wide.

Thus, as recognized by the OIG, the COPS Office had already been developing an on-line grant application system prior to the audit, and we agree with the OIG's finding that we will continue to prioritize our plans to do so.

Although the COPS Office is taking active and timely steps to implement on-line grant applications, any indication that the COPS Office needs to "speed up the grant approval and award process" would be misplaced. The COPS Office has had a reputation for being an efficient, effective, and customer-oriented agency beginning from the 1994 start of the program. Specifically, in the beginning of the program, the one-page application used for the initial grant initiatives issued by the COPS Office not only represented an innovative and streamlined approach to grant-making, but was also very successful in allowing agencies to expand their community policing efforts quickly, without compromising the quality and thoroughness of the grant application and award process.

Additional benefits were felt by smaller agencies that historically lacked the resources to devote to the writing of extensive Federal grant applications. As a result, thousands of these smaller agencies were able to apply for grants, thereby expanding their community policing efforts. According to the Urban Institute, "[t]he COPS Office devoted substantial effort to making the application process simple in comparison to other law enforcement grant programs ... [b]y any objective standard, the COPS Office succeeded in simplifying the application form." Additionally, the Urban Institute reported that, "[o]verall, satisfaction with COPS Office staff was high, and largely unrelated to the size or type of the [grantee] agency ... 90% of funded agencies said that the COPS staff had been helpful, and 84% said that their COPS contact was easy to reach."

The COPS Office's customers continue to express their overwhelming satisfaction with the efficiency and service provided by COPS. As recently as June 2003, the U.S. Conference of Mayors stated the following:

The COPS Office enjoys a unique relationship with state and local law enforcement and does a superb job of providing vital funding, quickly and

efficiently, to local communities, and is cited by mayors and police chiefs as a model federal agency.

Previously, in June 1999, the U.S. Conference of Mayors stated that “[t]he Department of Justice and the COPS Office have done a superb job of administering the COPS program so that funds are quickly and efficiently made available to local communities.” Similarly, in Congressional testimony in December 2001, the National Sheriffs’ Association testified that “the COPS Office is user friendly. It makes applying for grants significantly easier and much less intimidating. The direct connection that COPS has with law enforcement allows it to be effective and meet its goals.”

IV. Current Status of Prior Audits

The OIG raises two prior audits involving the COPS Office: First, the OIG’s April 1999 report of COPS grantees and, second, the July 1999 audit of COPS. Again, these three-year-old audits should be put into context with subsequent facts and events.

First, the OIG’s April 1999 audit report sought to summarize individual initial findings from OIG audits conducted in 1997 and 1998 of 149 grantees. The initial findings did not “conclude” that the grantees incurred unallowable costs, supplanted, failed to provide timely grant reports or to plan to retain the officers after the grants ended, or committed any other grant violations. Rather, the OIG made initial findings, which are in the nature of allegations of possible violations. Those allegations, or findings, are then subject to a complete investigation and final resolution with each audited grantee before the allegations can be considered substantiated, if in the end they can be.

In order to determine if the OIG’s characterization that its April 1999 findings meant that a “significant number of jurisdictions audited” were in grant violation, the Department of Justice contracted a former judge to act as an independent arbiter in a process called the audit resolution committee. The role of the arbiter was to conduct an impartial review of the OIG’s findings and determine if it were true that the grantees were guilty of grant violations. The arbiter conducted an in-depth review of a random sample of OIG audits by reviewing the OIG’s position, the grant terms and conditions, and the grantee’s position to determine whether the grantee was in compliance with the grant terms and conditions at the time of the audit.

After an exhaustive six-month review, the arbiter issued a lengthy opinion finding that, in almost 40 percent of the sampled audit findings, the grantee was not in violation of the grant condition as found by the OIG. Rather, the grantee was actually in compliance with the grant. Moreover, in the specific area of supplanting, the arbiter determined that in 67 percent of the OIG audits tested, where the OIG alleged that the grantee had violated the supplanting provision, the grantee was in fact in compliance with the supplanting provision. Both the OIG and the Department of Justice accepted the independent arbiter’s decisions as final and, in April 1999, reported it to Congress. See *Office of the Inspector General Semiannual Report to Congress (October 1, 1999 - March 31, 2000)*; *Attorney General’s Semiannual Management Report to Congress (October 1, 1999 - March 31, 2000)*.

While we rely on OIG audits of grantees as part of our overall monitoring and compliance strategy and devote substantial resources to resolving the audits, the audit resolution committee process proved that OIG audits are not indicative of COPS grantee compliance rates. Rather, only after the findings have been completely investigated can a decision be made as to whether a grantee is in compliance. In fact, the Inspector General himself confirmed this when testifying before Congress in March 2002, stating that one "could not statistically extrapolate" the results of an even larger group of grantee audits (330) to the entire population of COPS grants.

Second, the status of the OIG's July 1999 audit of the internal management and administration of the COPS grant program is not completely set forth. All of the recommendations included in the July 1999 report were closed by the OIG by June 2000. The OIG officially closed the report three years ago, based on the fact that the COPS Office and OJP had fully addressed all of the audit recommendations for improving the management of the COPS program. There are no continuing issues from the three-year-old audit.

These prior audit reports therefore are not indicative of COPS grantee compliance rates or of the COPS Office's current comprehensive monitoring and compliance strategy. The COPS Office's compliance program ranges from progress reports, desk reviews, and financial reviews to on-site monitoring visits and audits. All COPS divisions participate in ensuring grantee compliance and we commit a significant amount of resources to safeguarding Federal dollars. When it is determined that a grantee has violated the terms and conditions of its grant, the COPS Office takes enforcement action against the grantee, including obtaining the repayment of misspent grant funds.

V. Response to Audit Recommendations

Recommendation 1: Develop and implement a method of coordination to identify proposed programs and grants that have similar purposes and eliminate any duplication of effort to ensure that awards are not made to the same grantee for similar purposes.

The COPS Office and OJP agree to a two-step coordination process as follows:

1. The COPS Office and OJP will exchange program descriptions of allowable uses for COPS funds for hiring officers and civilians and purchasing equipment and technology and for the OJP LLEBG program as they become available throughout each fiscal year.
2. To the extent potential duplication is identified in step one, then the relevant program officials will coordinate as necessary on a case-by-case basis to ensure duplicative awards are not made to the same grantee for the same purpose.

Accordingly, the COPS Office requests closure of Recommendation # 1.

Guy K. Zimmerman
June 27, 2003
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Recommendation 2: Continue to develop an on-line application system for COPS grants that will allow potential grantees to complete grant applications on-line and that supports the downloading of on-line application data directly to the COPS Management System for processing.

In light of the fact that COPS was developing an on-line application system prior to this audit, the COPS Office agrees to continue to develop an on-line application system for COPS grants. Accordingly, the COPS Office requests closure of Recommendation # 2.

On the basis of the above information, the COPS Office considers the subject report closed as it pertains to the COPS Office and requests written acceptance of this determination from your office. If you have any questions regarding this response, please contact me at (202) 616-2888.

cc: Clark Cooper
Regional Audit Manager
Atlanta Regional Audit Office
Office of the Inspector General

Vickie Sloan
Director, Audit Liaison Office
Justice Management Division

**OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND
SUMMARY OF ACTIONS NEEDED TO CLOSE THE REPORT**

In its June 30, 2003, response to the OIG draft report, the Office of Justice Programs (OJP) concurred with our recommendations and discussed the actions it has already taken and will implement in response to the recommendations.

In its June 27, 2003, response, the Office of Community Oriented Policing Services (COPS) agreed with the two recommendations directed to it. However, the COPS Office took exception to how we presented various information in the report and to some of the conclusions we reached about the COPS Office. The COPS Office asserted that the information in its response would "put certain points raised by the OIG about our programs and our relationship with the OJP in context."

In this following analysis of the COPS Office response, we disagree with many of the COPS Office's comments and characterizations about the OIG report. We do not address all of the comments individually, but instead provide below a response to the most relevant issues raised by the COPS Office's response. After that, we address the OJP and COPS Office's responses to each of our individual recommendations.

The COPS Office's Initial Grant Programs

The COPS Office contends that our report did not put into proper perspective the fact that OJP awarded the 392 initial Phase I COPS grants for the COPS Office. As a result, the COPS Office suggests that our report unfairly characterized OJP's awarding of these grants as an example of the COPS Office's reliance on OJP.

Contrary to the COPS Office's contention, we accurately presented the facts that OJP awarded the first 392 Phase I COPS grants for the COPS Office early in FY 1995 because the COPS Office was not ready to do so quickly after being established late in 1994. We also stated that the COPS Office went on to award about 7,000 grants during the remainder of FY 1995. While the number of grants awarded by OJP for the COPS Office appears small, as we indicated in the report, it was the first of many actions performed by OJP for the COPS Office.

The COPS Office's Reimbursable Agreement with OJP

The COPS Office took exception to our statement that the COPS Office continually turned to OJP for services related to the COPS program. The COPS Office stated that each year the list of services obtained from OJP through a reimbursable agreement is reassessed and modified and that since the beginning of the COPS program the utilization of OJP's services by the COPS Office has decreased. The COPS Office further stated that the list of services we provided in the draft report does not accurately reflect the specific services currently received from OJP. In addition, the COPS Office indicated that the reimbursable agreements allowed it to utilize available, pre-existing resources of other agencies, rather than reinventing the wheel, and made for cost-effective use of Federal government resources.

The facts related to the COPS Office's use of a reimbursable agreement with OJP to obtain services related to the COPS program clearly support that the COPS Office continually relied upon OJP for such services. The report disclosed that for FY 1999 through FY 2002, the COPS Office transferred about \$16 million in management and administration costs to OJP through reimbursable agreements for OJP to perform COPS-related services. The audit report also graphically illustrated that the amounts transferred decreased in FY 2000 and FY 2001, but increased in FY 2002 to the FY 2000 level. In addition, the list of services included in the audit report was current at the time of the audit and was verified by both COPS and OJP during the audit and after the exit conference in April 2003. We cannot comment on any modifications to the list of services after the exit conference, since the COPS Office did not provide any documentation with its response to support such modifications.

We do not take issue with the COPS Office's contention that reimbursable agreements allowed it to use existing resources of OJP rather than "reinventing the wheel." We reported that the COPS Office's use of reimbursable agreements indicates that OJP was better suited to provide the functions for the COPS program. We did not examine in detail the use of reimbursable agreements to confirm whether they are more cost-effective, as the COPS Office contends. Moreover, whether or not the COPS Office's assertions about reimbursable agreements are true does not change the fact that the COPS Office relied on OJP to perform services related to the COPS program. Therefore, we believe the report fairly presents the COPS Office's use of reimbursable agreements as a method of reliance on OJP to perform COPS-related services.

COPS Funds Passed Through to OJP

The COPS Office commented that almost all of the funds that the COPS Office passes through to OJP are mandated by Congress in the COPS Office's annual appropriations language. The COPS Office also commented that the earmarked funds passed through to OJP are for either continuing projects previously administered by OJP or existing projects within OJP. The COPS Office also stated that discretionary pass-through funds are for projects jointly managed by the COPS Office and OJP.

Our report clearly identified that most of the funds passed through from COPS to OJP were mandated by Congress. In addition, our report also clearly indicated the reasons as reiterated in the COPS Office's response for why earmarked and discretionary funds are passed through to OJP. Accordingly, the report fairly presents that the amount of funds passed through from the COPS Office to OJP has steadily increased and reached almost 40 percent of the COPS Office's total budget for FY 2002.

Comparison of the COPS Office's Costs to Manage and Administer Grants

The COPS Office contends that we did not provide it with the details of how we calculated the ratios of management and administration (M&A) costs per program dollar and per grant administered. The COPS Office stated that it appears that we reached our conclusion by comparing the COPS Office's M&A costs in one fiscal year to the amount of COPS grants awarded in that year. The COPS Office also stated that while it has reduced its M&A costs to program dollar ratio over the years, it would be imprudent for a program managing over \$8 billion in active grants to further reduce personnel costs while continuing to effectively safeguard Federal funds. In addition, the COPS Office also stated that by looking at only the amount of grants awarded in a given year, our analysis does not take into account the work required for new program implementation and application processing.

The COPS Office is inaccurate when it states that we did not provide it with the details of how we calculated the ratios of management and administration (M&A) costs per program dollar and per grants administered. On several occasions during the audit and again at the exit conference, we informed top COPS Office officials of the methodology we used to calculate the ratios of M&A costs to program dollars and to grants administered. For the ratio of M&A costs to program dollars, the COPS Office and OJP were not able to provide data showing the amount of M&A costs used to administer current year program dollars versus the amount used to administer previous years program dollars. Accordingly, we only were able to show the ratio of

actual M&A costs spent during the fiscal year to the actual program dollars spent during the fiscal year. The source documents used to obtain the actual program dollars and M&A costs were verified by the COPS Office and OJP after the exit conference.

Further, the COPS Office's argument fails to take into account that our analysis was consistently applied for both the COPS Office and OJP. Therefore, the analysis fairly presents the COPS Office's M&A costs ratios as compared to OJP's. In addition, contrary to the COPS Office's contention, our analysis of M&A costs to grants administered did not compare the M&A costs to the grants awarded in one fiscal year, but instead compared the M&A costs spent in each fiscal year to the total active grants (awarded plus ongoing) administered during that fiscal year. Therefore, the analysis fairly presents that the COPS Office's M&A costs per grants administered have been increasing steadily while OJP's have been decreasing.

Purposes of COPS Grants and OJP Grants

The COPS Office takes exception to our conclusion that the COPS Office's grants for hiring law enforcement personnel and for purchasing equipment and technology duplicate some awards made under OJP's Local Law Enforcement Block Grant (LLEBG) program. The COPS Office contends that the two programs are not duplicative since under the COPS grants the grantees are required to use the funds to advance community policing while under OJP's LLEBG grants the grantees may choose to support community policing with the funds but are not required to do so. In addition, the COPS Office stated that the potential grantees are selected for awards from different pools under different funding criteria. Specifically, the COPS Office stated that the LLEBG grants are limited to jurisdictions based on the number of Uniform Crime Report Part I violent crimes reported to the FBI while all state, local, federally recognized tribal and public law enforcement agencies are eligible to apply for COPS Office grants. The COPS Office also stated that the three situations we cited as being duplicative were situations where the grantees made complimentary use of different funding sources to add to, but not duplicate, the same crucial law enforcement purpose. The COPS Office's response for each situation follows:

Orange County, Florida Sheriff's Office: The COPS Office stated that the COPS grant funds were limited in the types of technology that could be purchased under the grant and that the grant required that the purchased technology result in the redeployment of officers into community policing. The COPS Office stated that the OJP LLEBG grant funds were used to purchase technology that was not allowable under

the COPS grant. Therefore, COPS contends the grants were not duplicative.

City of Orlando, Florida: The COPS Office stated that like the Orange County situation, the OJP LLEBG grant was used to purchase safety equipment that was beyond the scope of the COPS-funded Secure Our Schools (SOS) grant. Therefore, COPS contends the grants were not duplicative.

City of Daytona Beach, Florida: The COPS Office stated that while the grantee did use the COPS grant funds to hire seven officers and the OJP LLEBG grant funds to hire five officers to perform community policing, the grants were not duplicative because the COPS grant was for three years and required the officers to perform community policing while the LLEBG grant was only for one year and the grantee voluntarily chose to use the officers to perform community policing.

The COPS Office is incorrect in its contention that the COPS hiring and technology grants are not duplicative of grants awarded under OJP's LLEBG grants. The fact that the COPS grant is required to advance community policing while the LLEBG grants are not does not change the fact that the two grants are sometimes used for the same or similar purposes as we identified in the report. When such cases occur, the grants are, in fact, duplicative. We also believe that for the three situations cited in the report the grants were duplicative, as explained below.

Orange County, Florida Sheriff's Office: While the COPS Office stated that the OJP LLEBG grant funds were used to purchase technology that was not allowable under the COPS grant, we found the opposite to be true. We obtained documentation during the audit that showed both the COPS technology grant and the OJP LLEBG grant were used to purchase similar computers and related software/accessories.

City of Orlando, Florida: While the COPS Office stated that the OJP LLEBG grant was used to purchase safety equipment that was beyond the scope of the COPS-funded Secure Our Schools (SOS) grant, we found the opposite to be true. We obtained documentation during the audit to show that the grantee used the OJP LLEBG grant to obtain video camera security systems for two schools. Based on the COPS Office's criteria for the COPS SOS grants, the SOS grants can be used to purchase the video equipment purchased by the grantee under the OJP LLEBG grant.

City of Daytona Beach, Florida: The COPS Office's argument for this situation is not well based. Regardless of whether the grants were for three years or one year and whether the grantee was required to or voluntarily hired officers to perform community policing, the fact is that the COPS hiring grant and OJP LLEBG grant were used for the same purpose.

Capability to Apply for Grants Online

The COPS Office provided a lengthy discussion of information regarding the actions it has taken to develop an on-line grant application capability, much of which COPS stated was ongoing prior to the initiation of our audit.

While we acknowledged some of the COPS Office's actions in our report, the COPS Office did not disclose to us during the audit many of the actions it cited in its response to the draft report. In addition, the COPS Office did not provide any evidence in its response to support the type and timing of the actions taken. The COPS Office, however, did agree to continue actions to develop an on-line application capability that would allow it to receive grant applications and to download the application data directly into the COPS management system.

Current Status of Prior Audits

The COPS Office stated that our discussions of the two prior audits related to the COPS program should be put into context with subsequent facts and events. The COPS Office's comments regarding each of the prior audits is as follows:

April 1999 Summary Report: The COPS Office stated that this report of COPS grantees did not "conclude" that the grantees incurred unallowable costs, supplanted, failed to provide timely grant reports, failed to plan to retain the officers after the grants expired, or committed any other grant violations. The COPS Office stated that our report instead made allegations of possible violations that are then subject to a complete investigation and final resolution with each audited grantee before the allegations can be considered sustained. The COPS Office stated that after an exhaustive six-month review by an independent arbiter hired by the Department of Justice, the arbiter found that the grantees were not in violation of the grant conditions in almost 40 percent of the sampled audit findings reviewed.

July 1999 Internal Management and Administration Report: The COPS Office stated that the status of this report was not completely set forth. The COPS Office stated that all the recommendations in the report were closed by the OIG by June 2000 and that there are no continuing issues from the three-year old audit.

In its attempt to place our prior audits of the COPS program into a context that supported its position, the COPS Office misstated the facts regarding the two reports. Contrary to the COPS Office statements regarding the April 1999 Summary Report, the report did in fact conclude that the COPS grantees incurred unallowable costs, supplanted, failed to provide timely grant reports, failed to plan to retain the officers after the grants expired, or committed other grant violations. The findings in the 149 individual COPS grant audit reports that were summarized in the report were not “allegations” of possible violations as the COPS Office contends. Instead, the findings were supported by evidence as described in each individual audit. The accuracy of our findings was evidenced by the fact that in the majority of the sampled issues either the arbiter found or the COPS Office concluded that the grantees were, as originally reported, not in compliance with certain grant conditions at the time of the audit. In the remaining issues, the arbiter found that the grantees were in compliance based on the totality of the information available at the time of the audit—including information that was not provided to the OIG by the grantees but was provided to the arbiter for the first time.

As for the July 1999 Internal Management and Administration Report, the COPS Office is incorrect in stating that the status of this report was not completely set forth in the draft audit report. Contrary to the COPS Office’s assertion, the draft audit report disclosed that the COPS Office and OJP had reported taking corrective actions to address the issues in the report and that the audit report was closed.

Recommendation Number

1. **Resolved.** The COPS Office and OJP agreed to coordinate and exchange information about grant programs to ensure duplicative awards are not made to the same grantee by both agencies. The COPS Office stated the coordination and exchange of information would take place throughout the year while OJP stated the coordination and exchange would take place at the beginning of each fiscal year. We can close this recommendation when we receive documentation of procedures developed and agreed to by the COPS Office and OJP showing how and when the coordination and exchange of information

will take place and how they will ensure duplicative awards are not made to the same grantee for similar purposes.

2. **Resolved.** The COPS Office agreed to continue to develop an on-line application system for COPS grants. We can close this recommendation when we receive documentation showing that the COPS Office has developed an on-line application system for COPS grants that will allow potential grantees to complete grant applications on-line and that supports the downloading of on-line application data directly to the COPS Management System for processing.
3. **Resolved.** OJP agreed with the recommendation and stated that it began a two-phase reorganization plan in 2001. OJP stated that it had:
1) merged the programs and staffs of the Corrections Program Office and the Drug Courts Program Office into the Bureau of Justice Assistance, 2) created the Office of the Chief Information Officer, and 3) merged the Office of Congressional and Public Affairs and other dissemination functions into one office. OJP stated that in the near future it will: 1) consolidate several administrative and support functions into the Office of Management and Administration; and 2) merge the programs, functions, and staff of the Executive Office for Weed and Seed and the American Indian/Alaska Native Affairs Desk into the Community Capacity Development Office.

As noted in the audit report, we found that OJP intends to implement its reorganization in three phases, not two. In the third phase, OJP plans to obtain revisions to existing statutes that provide final grant-making authority to OJP's bureaus instead of to the Attorney General or Assistant Attorney General for OJP. We can close this recommendation when we receive documentation showing the three phases of the reorganization plan have been implemented.

4. **Resolved.** OJP agreed with the recommendation and stated that it had embarked upon a multi-year effort to improve the way it accomplishes its mission and serves its customers. OJP stated that it had developed a comprehensive Management Plan that identifies and schedules its major change initiatives. One of the strategies is to develop internal mechanisms to collaborate in targeting resources to maximize impact. OJP also cited four recent accomplishments to improve internal collaboration. OJP also stated that it would investigate the need for better internal collaboration and establish more formal organized methods to collaborate where needed. We can close this recommendation when we receive a copy of OJP's Management Plan and the formal organized methods of collaboration developed by OJP to

ensure that overlapping programs that exist after the reorganization is implemented are identified and eliminated.

5. **Resolved.** OJP agreed with the recommendation and stated that it is on track to fully implement the Grants Management System (GMS) Build-Out program by the end of December 2003, an achievement that will fully automate the OJP "Redbook" process from solicitation to close-out. We can close this recommendation when we receive documentation showing that OJP has completed the GMS Build-Out program and that it fully automates the OJP "Redbook" process from solicitation to close-out.
6. **Resolved.** OJP agreed with the recommendation and stated that it is on track to implement, by the end of December 2003, an enhanced GMS system with modules that will expand the system to manage grants from beginning to end. We can close this recommendation when we receive documentation showing that OJP has implemented the enhanced GMS system and that the enhanced GMS system manages grants from beginning to end.
7. **Resolved.** OJP agreed with the recommendation and stated that it was on track to eliminate duplicative systems by the end of December 2003. OJP stated that in coordination with the GMS Build-Out program, the Office of the Chief Information Officer initiated the Legacy Brown-Out program to eliminate overlapping or duplicative automated systems after each phase of the GMS Build-Out program is implemented. We can close this recommendation when we receive documentation showing that OJP has completed the Legacy Brown-Out program and eliminated the overlapping or duplicative systems.
8. **Resolved.** OJP agreed with the recommendation and stated that all OJP bureaus and program offices were mandated to use GMS for all grant solicitations and awards opened or announced after January 31, 2003, except for awards made under the State Criminal Alien Assistance Program and the Local Law Enforcement Block Grant program. OJP stated that these two programs already were considered a part of OJP's electronic grant management system. We can close this recommendation when we receive documentation showing how OJP plans to monitor the bureaus to ensure they use the GMS system to enable grantees to submit grant applications online for all bureau grant programs.