

Tips for Managing Your Title II Award as a Funding Recipient

General Conditions

The Award Document is the state's legally binding agreement with the Office of Justice Programs (OJP) for receipt of Title II funds. Up to 30 [Mandatory Award Conditions](#) (i.e., General Conditions) are expected to be placed on all or almost all OJP awards in 2021 reflecting Federal statutes, regulations, and other conditions. Title II-specific and other conditions will also be placed on the award. If a designated state agency (DSA) fails to fully comply with the mandatory requirements and award terms, the Office of Juvenile Justice and Delinquency Prevention (OJJDP) may impose additional award conditions or take other actions as appropriate under the circumstances.

TIPS

- As early as possible, preferably during the application phase, review the list of the 30 General Conditions that are expected to be on all 2021 federal awards from OJP (see <https://www.ojp.gov/funding/explore/legaloverview2021/mandatorytermsconditions>).
- Take time to document how your agency complies, as compliance procedures could be subject to review during a Federal site visit.
- These universal conditions often remain the same from year to year, but always conduct a side-by-side comparison with the previous and current award documents to determine whether these requirements have changed in content.
- Many of the statutes, regulations, and conditions placed on the Title II award are applicable to multiple federal grants awarded by OJP.
- If the DSA administers other OJP grant programs (e.g., Justice Assistance Grant), the DSA grant program managers and the financial staff for each should meet to determine which laws, conditions, rules, and regulations are global (applicable to most/all grant programs) and which are grant-specific.
- This process can create an economy of scale with one or more DSA staff assigned to confirm DSA compliance and document the processes by which DSA compliance can be shown.

Financial Management and System of Internal Controls

Title II award recipients and subrecipients (including recipients or subrecipients that are passthrough entities) must comply with standards for financial and program management ("Part 200 Uniform Requirements"). If it is determined that an applicant poses a higher risk to OJP, it could affect the funding decision and/or result in additional reporting requirements, monitoring, special conditions, withholding of award funds, or other additional award requirements.

TIPS

- It is important to review your DSA's [Financial Management and System of Internal Controls Questionnaire](#) submitted with the last Title II application.
- Note any identified past performance or other programmatic or financial concerns. Ask whether these issues have been or are still being addressed by the DSA.

DUNS Number and SAM

Recipients of federal funds must have a Data Universal Numbering System (DUNS) number when applying for Federal awards and cooperative agreements (initial or supplemental awards) (2 C.F.R. Part 25 - Universal Identifier and System of Award Management). Recipients must have registered their DUNS number in the System of Award Management (SAM): <https://sam.gov/content/home> to receive an award, and SAM registrations must be updated or renewed at least once per year to maintain an active status. This registration must be "active" in SAM for the entire period of the award.

TIPS

- Do not wait until the last minute to verify that the DSA's SAM registration is current. Determine who at the DSA is responsible for SAM registrations.
- Oftentimes, a new juvenile justice specialist is hired, and the person responsible for SAM registrations for the DSA (sometimes the prior juvenile justice specialist) cannot be identified. Having to re-register for access to SAM can take days and, thus, can delay your ability to submit your application.

Approved Budget Set-Up in State Accounting System

Once approved by OJJDP, the budget for your Title II program should not change unless and until a budget modification is approved by OJJDP. Communication between the grant award administrator (formerly known as the Point of Contact) and the financial manager (formerly known as the Financial

Point of Contact) is vital in ensuring that the necessary budget amendments are made and that approvals of such requests are shared, so the state accounting system always reflects the most recently approved Title II budget.

TIPS

- Make sure the budget established in the state’s accounting system matches the Title II budget as submitted and/or approved by OJJDP.
- Make sure the budget and accounting system includes the match required.
- Maintain records that show the source, amount, and timing for all matched contributions.
- Set up each budget category separately in your State's financial system.
- Use a coding string for each budget category [Chart of Account Element/Program Code] to record, track, and reconcile expenditures by budget category both in the financial system and externally.
- Grant award modification (GAM) requests and approvals must be shared with the financial manager so that the Title II budget in the state’s accounting system is current. GAMs should be placed into the Title II Grant Financial File created and maintained by the financial manager.

Monitoring Your Title II Budget

The Title II Grant budget should be jointly monitored on a routine basis by both the grant award administrator and financial manager to review for accuracy of the budget and expenses being attributed to the Title II award.

TIPS

- On a routine basis (ideally monthly but no longer than quarterly prior to the Federal Financial Report submissions), the financial manager (or designee) should generate system report(s) from the accounting system to use for tracking, reconciling, and conducting “budget to actual” comparisons.
 - The report generated from the state system should be used for monitoring and monthly reconciling by the juvenile justice specialist as the grant award administrator and the financial manager. Do the numbers from the state accounting system match those that are captured by the juvenile justice specialist including subgrant expenditures?
 - Are there expenses that need to be removed as they were inaccurately attributed to Title II?
 - If the grant is close to expiration or in the closeout period, monitor this on a weekly or daily basis.
- Use these meetings to assess whether a final budget revision request to OJJDP is needed.

Draw Down Requests and Cash on Hand

Develop written procedures for cash management of funds to ensure that Federal cash on hand is kept at or near zero. Draw down requests should be timed to ensure that Federal cash on hand is the minimum needed for disbursements/reimbursements to be made immediately or within 10 days. If Title II funds are not spent or disbursed within 10 days of receipt, funds must be returned to the awarding agency. DOJ periodically conducts financial reviews to ensure that this requirement is met.

TIPS

- Include processes for draw down requests into the DSA's Grant Management Policies and Procedures.
- Have a similar policy with your subgrants and contracts or institute a reimbursement-only policy for subgrantee and contract billing. Include this policy in the Administrative Guide for Subgrantees.

Suggested Federal Grant File Content

When OJJDP or other federal funders conduct grant monitoring or audits, a standard request will be made for states to provide their federal award file, which should contain documentation regarding the federal grant award. The grant award file can be available in electronic, paper, or hybrid formats.

TIP

State agencies receiving federal funds should develop a grant file for each individual federal award. The following documents are suggested for inclusion in the file:

- Full application and any updates
- Signed award document
- GAM requests and associated documents
- GAM approvals or denials (they are listed by #); Some GAMs are automatically generated, and you do not necessarily get a notice, so periodically check to see whether a GAM has been initiated by OJP. Some GAMS may include multiple awards made to the state agency, so be sure to check all GAMs as they are posted.
- Federal fiscal reports
- Federal progress report narratives and performance measures reports
- Subgrant/contract process such as announcement of funds, application documents, scoring process (if applicable), State Advisory Board (SAG) process in awarding funds (if applicable), etc.
- List of subgrants awarded (including award amounts and dates of awards).

Retention of Records

Per [2 C.F.R. § 200.333](#), retain all financial records, supporting documents, statistical records, and all other records pertinent to your Title II award for a period of 3 years from the date of submission of the final expenditure report (Federal Financial Report/SF-425). There are several exemptions from the above (for details, see DOJ Financial Guide, p. 126). This Retention of Records requirement is also applicable to Title II subrecipients/subgrantees.

TIPS

- Check your state policy regarding retention of records and use whichever retention date is longer.
- Retained records can be kept in print-copy or electronic format.
- Entirety of subgrant records and grant program administrative file records (emails, phone call logs included) are to be retained, and this requirement must be communicated to subgrantees.
- See [§200.334\(a\)-\(f\)](#), Retention requirements for records, for more detail.

Additional Resources

- The DOJ Grants Financial Guide can answer questions and provide guidance regarding pre-award and post-award management of grant awards. See the guide at https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/DOJ_FinancialGuide_1.pdf.
- The General Universal and Other Conditions placed on Federal awards is explained at <https://www.ojp.gov/funding/explore/legaloverview2021/mandatorytermsconditions>.



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