



September 10, 2018

MEMORANDUM FOR: Dr. Walter G. Copan
Director & Under Secretary of Commerce
for Standards and Technology

FROM: Mark H. Zabarsky
Principal Assistant Inspector General for Audit and Evaluation

SUBJECT: *NIST Should Improve Controls for Monitoring R&D Grants and Cooperative Agreements*
Final Report OIG-18-025-A

This report provides the results of our audit to assess the National Institute of Standards and Technology's (NIST) use of \$300 million allocated by the Middle Class Tax Relief and Job Creation Act of 2012 (the Act) for public safety communications research and development (R&D). The objective of our audit was to assess whether NIST is appropriately using funds allocated by the Act to conduct public safety communications R&D, including NIST's management of the Public Safety Innovation Accelerator Program (PSIAP). NIST's Public Safety Communications Research division (PSCR) plans to spend \$132.4 million of its \$300 million budget on PSIAP grants and cooperative agreements (PSIAP awards), of which it spent \$31.4 million in FY 2016 and FY 2017.

In this audit, we evaluated the existence and effectiveness of NIST's controls to manage Act funds, including PSIAP awards and "Open Innovation Prizes and Challenges."¹ We reviewed relevant policies and procedures pertaining to NIST's use of Act funds, including controls for the overall R&D program and management of PSIAP awards and prize challenges. We interviewed relevant NIST officials and assessed supporting documentation of NIST's R&D efforts.² Appendix A provides more details about our objective, scope, and methodology.

¹ NIST established the "Open Innovation Prizes and Challenges" program to "create a framework in which [it] can work with individuals, companies, organizations, and academic institutions in a rapid, more collaborative way than traditional engagements." The program "leverages financial awards and incentive based activities to solve discrete and well defined problems surrounding: Crowdsourcing, Prize and Challenge Competitions, Hack-a-thons, Data Jams, Ideation, Collaborative Iteration & Design, and Team-building Activities." NIST Website: <https://www.nist.gov/ctl/pscr/funding-opportunities/prizes-challenges>. Accessed July 9, 2018.

² In part, we selected non-statistical and statistical samples of supporting documentation to evaluate NIST's management of R&D Act funds, including files for 1) a non-statistical sample of five PSIAP award recipients to evaluate NIST's awarding, monitoring, and close-out phases; 2) a non-statistical sample of four applicants from NIST's 2017 prize challenge, "Virtual Public Safety Test Environment Challenge" to evaluate whether it selected award winners properly, and 3) a statistical sample of 50 R&D expenditures funded by the Act to evaluate whether expenditures were appropriate and properly approved by NIST management.

Based on our review, we found that NIST has opportunities to strengthen its controls for monitoring PSIAP awards. In addition, we noted other less significant matters that came to our attention during the audit. We discussed these matters with NIST PSCR and Grants Management Division (GMD) officials.

Background

Passed by Congress in February 2012, the Act contained provisions for the buildout, deployment, and operation of the First Responder Network Authority (FirstNet) Nationwide Public Safety Broadband Network (NPSBN), a dedicated, interoperable network for emergency responders.³ NIST was provided up to \$300 million from the Public Safety Trust Fund⁴ to conduct research and assist with the development of standards, technologies, and applications to advance wireless public safety communications in support of FirstNet's NPSBN. In part, the Act requires NIST to establish a research plan and direct research that accelerates the development of communications technology that can be integrated into the NPSBN.⁵ NIST is also required to consult with various federal agencies and convene working groups with government and commercial parties to discuss public safety communications.⁶

NIST's PSCR has led NIST's R&D efforts required by the Act.⁷ PSCR noted that NIST has been working with first responders and industry partners since 2002 in order to gather and develop standards for public safety communication requirements and perform other R&D activities. PSCR stated that its continued actions in these areas supports FirstNet's efforts to provide a network dedicated to public safety users. Prior to receiving dedicated R&D funds from the Public Safety Trust Fund, NIST and FirstNet entered into an interagency agreement authorizing PSCR to conduct public safety R&D in support of FirstNet. PSCR began managing grants and cooperative agreement awards in 2017 for the first time.

NIST received initial Act funds in November 2015 and has begun executing its R&D program. At the time of our audit, 49 full-time equivalent staff members worked on the R&D program, and NIST's GMD provided administrative support for PSIAP awards. As of January 25, 2018, NIST has obligated \$64.1 million out of the \$300 million Public Safety Trust Fund allocation, which is available until the end of fiscal year (FY) 2022.⁸

PSCR outlined its approach to accomplish the Act requirements in its R&D plan, *NIST's Role in the Middle Class Tax Relief and Job Creation Act of 2012*. We found PSCR's main R&D efforts

³ Pub. L. No. 112-96, 47 U.S.C. § 1424.

⁴ In the Act, Congress directed proceeds from specific spectrum auctions to be deposited in the Public Safety Trust Fund to fund public safety initiatives and deficit reduction. Pub. L. 112-96 § 6413, 47 U.S.C. § 1457. Although the Act was passed in 2012, NIST did not receive funds until November 2015, after the Federal Communications Commission executed the spectrum auctions and transferred funds into the Public Safety Trust Fund.

⁵ Pub. L. No. 112-96 § 6303, 47 U.S.C. § 1443.

⁶ *Id.*

⁷ PSCR is a division within the NIST Communications Technology Laboratory, which was established in order to unite NIST's many wireless communications efforts into a unified research and development organization.

⁸ Pub. L. No. 112-96 § 6413, 47 U.S.C. § 1457.

included conducting internal R&D projects; developing and overseeing PSIAP award projects;⁹ developing and executing R&D prize challenges; and consulting with relevant public safety communications stakeholders. NIST estimates that it will allocate a significant portion of R&D funds to PSIAP awards and prize challenges—approximately \$132.4 million and \$27.1 million, respectively. See table I for PSCR’s estimate of spending for the \$300 million allocation, and appendix B for a further description of PSCR’s main R&D efforts.

Table I. PSCR’s Estimated Spending Plan for R&D Activities Funded by the Act

Total Estimated Spending Per R&D Activity, Through FY 2022 (in millions)*					
PSIAP Awards	Contracts	Labor	Interagency Agreements	Prizes and Challenges	Operations
\$132.4	\$48.6	\$41.6	\$36.7	\$27.1	\$13.6

Source: PSCR’s estimated spending plan, “PSCR Auction Funds Spend Plan by FY,” October 2017.

* Estimated funds total \$300 million authorized by the Act.

Finding and Recommendation

We found that NIST, led by PSCR and with grants administration support from GMD, established a framework to conduct public safety communications R&D. PSCR has demonstrated—through the R&D activities described in the background section and appendix B—that it is working towards accomplishing requirements of the Act. In addition, we did not identify significant exceptions in our tests of R&D expenditures, including those pertaining to PSCR’s processes for approving expenditures funded by the Act.¹⁰ We found that PSCR established a spending plan to use the \$300 million allocated for public safety communications R&D within the Act’s required timeframe. However, we identified internal control weaknesses in NIST’s monitoring of award recipient performance. PSCR officials had issued minimal procedures to ensure that once funds are awarded, federal program officers (FPOs) perform appropriate oversight of the award recipient’s financial and programmatic performance. In addition, we found that the FPOs lack experience administering grants and cooperative agreements.

In total, PSCR plans to spend \$132.4 million of its \$300 million budget on PSIAP awards, of which it spent \$31.4 million in FY 2016 and FY 2017. By correcting weaknesses in award recipient monitoring procedures, NIST can enhance its oversight processes and reduce the risk

⁹ At the time of our audit, PSIAP award projects consisted of 10 grants and 23 cooperative agreements. Grants and cooperative agreements are both legal instruments reflecting a relationship between the Department and a recipient where the principal purpose is to transfer anything of value in order to accomplish a public purpose authorized by federal statute. Cooperative agreements differ from grants in that they anticipate substantial involvement (e.g., collaboration, participation, or intervention by the Department in the management of the project) between the Department and the recipient during the performance of the contemplated activity. U.S. Department of Commerce, October 24, 2016. *Grants and Cooperative Agreements Manual*. Washington, DC: DOC, 5-31.

¹⁰ Our statistical sample includes expenditures from FYs 2016 and 2017 but not expenditures for payroll transactions or grant recipient drawdowns, which we reviewed separately.

that the estimated remaining PSIAP funds of \$101 million in FY 2018 through FY 2022 are not effectively and efficiently spent.

PSCR Did Not Develop, Document, and Approve Comprehensive Programmatic Monitoring Procedures for Its Oversight of PSIAP Awards and R&D Activities

Based on our sample of five PSIAP awards—two grants and three cooperative agreements¹¹—and overall assessment of processes for monitoring PSIAP awards, we found NIST has opportunities to strengthen its policies and procedures for monitoring grants and cooperative agreements. For example, NIST policy does not require grant officers and FPOs to visit award recipients to monitor their performance or expenditures. NIST relied on a PowerPoint training presentation¹² and Worksheets¹³ for its oversight policies and procedures but had no policies or procedures formalized, approved, or issued. Specifically, we found the following internal control weaknesses in NIST’s monitoring of award recipient performance:

- PSCR officials had not conducted any site visits to award recipients at the time of our fieldwork and had no formal policy or plan to perform or evaluate the need for common grant monitoring actions like site visits. Conducting periodic, comprehensive reviews of information reported by award recipients using site visits, a best practice, increases the likelihood of detecting fraud, waste, or abuse in PSIAP awards.
- FPOs could not always provide evidence supporting monitoring discussions with all sample award recipients. Of the four FPOs assigned to monitor our sampled PSIAP awards, two could not provide evidence to support that appropriate monitoring discussions took place. For example, one FPO stated that conference calls with the award recipient did not involve discussions regarding their performance or progress in achieving program objectives. The other FPO held two conference calls; however, the calls included all award recipients in the FPO’s portfolio but were intended as opportunities for award recipients to share project information with the group.
- FPOs did not consistently meet the 30-day timeline required by the Department’s *Grants and Cooperative Agreements Manual* for reviewing and approving quarterly Research Performance Progress Reports (RPPRs). Of the 10 RPPRs reviewed, 4 FPO approvals (40 percent) were not submitted to the GMD in a timely manner, ranging from 17 to 64 days late. We also found little evidence that the FPOs use the reports to assess overall award recipient performance or test the validity of expenditures,

¹¹ To ensure our sample included a cross-section of grants and cooperative agreements, we selected a judgmental sample of awards. We based our sample selection on award amounts, federal funds drawn, special award conditions, and the type of entity (university, private, and foreign versus American). Additionally, we ensured our sample included at least one award managed by each of the FPOs. We did not project our results to the population; however, the procedures we reviewed affected all FPOs.

¹² Grants Management Division (GMD) developed a training presentation for the program office explaining the processes for reviewing PSIAP recipients’ quarterly FFRs and Research Performance Progress Reports (RPPRs).

¹³ The program office developed the PSIAP “Report Review Worksheet” (checklist) for FPOs to use while reviewing FFRs and RPPRs.

both important internal controls to ensure award progress and compliance with program requirements.

- FPOs did not ensure that recipients reported the completion percentages of their milestones, as required.¹⁴ For the 10 RPPRs we reviewed, none of the recipients reported the progress in achieving all milestones. Milestones are an important tool for assessing grant performance and complying with award reporting requirements.

We also found that PSCR management designated portfolio leaders and met with them weekly to discuss significant activity within their portfolios. Senior leadership also met with portfolio leaders quarterly to review each portfolio in greater detail. Portfolio leaders manage many R&D activities within their respective portfolios including internal R&D projects, PSIAP awards,¹⁵ and stakeholder outreach events. Although PSCR senior leadership performed internal reviews of each portfolio, none of the review processes were formalized in an approved policy or procedure. Furthermore, we reviewed a non-statistical sample of documentation for three portfolio reviews and found that senior management did not provide comments regarding feedback or agreement with the portfolio leaders' management of the portfolios.

The Department's *Grants and Cooperative Agreements Manual*, which outlines the requirements for administration of grants and cooperative agreements,¹⁶ assigns responsibility for oversight of awards to operating units or program officers, noting that the purpose of project monitoring is to track recipient progress, compare the progress to goals established in the award,¹⁷ and ensure that recipients fulfill the terms and conditions of their awards. Monitoring the awards may include conducting site visits and meetings, reviewing written reports, and performing other tasks deemed appropriate by the grants officer.¹⁸

Further, the Government Accountability Office's (GAO's) *Standards for Internal Control in the Federal Government* states that management develops, maintains, and clearly documents internal control, which may appear in directives, policies, or operating manuals, in either electronic or paper form.¹⁹ These controls help (a) track major achievements and compare those results to plans and goals; (b) achieve organizational objectives and address related

¹⁴ FPOs used the National Science Foundation's guidance for reporting RPPRs because they stated it represented the best approach for reporting performance results for scientific R&D, similar to the PSIAP awards. According to this guidance, recipients are required to "show actual completion dates or the percentage completion [of milestones]." See National Science Foundation, "Final Format Research Performance Progress Report" at website https://www.nsf.gov/bfa/dias/policy/rppr/format_ombostp.pdf (accessed July 9, 2018).

¹⁵ Portfolio leaders manage between 6 and 10 PSIAP awards depending on the award focus and the FPOs area of expertise.

¹⁶ U.S. Department of Commerce, October 24, 2016. *Grants and Cooperative Agreements Manual*. Washington, DC: DOC, 1-7, available at http://www.osec.doc.gov/oam/grants_management/policy/documents/Grants%20Manual%20-%202016.pdf (accessed July 9, 2018).

¹⁷ *Ibid.*, 4-27.

¹⁸ *Ibid.*, 10-61.

¹⁹ U.S. Government Accountability Office, September 2014. *Standards for Internal Control in the Federal Government*, GAO-14-704G. Washington, DC: GAO, 29, 48, available at <https://www.gao.gov/assets/670/665712.pdf> (accessed July 9, 2018).

risks; and (c) establish and communicate “the who, what, when, where, and why of internal control execution to personnel.”²⁰

The lack of sufficient written policies and procedures, combined with, as noted above, the fact that PSIAP is PSCR’s first experience in managing grants and cooperative agreements, can lead to program vulnerabilities. To address these risks and expedite the development of comprehensive monitoring controls, we discussed our finding with PSCR management in January 2018. As a result, PSCR officials began taking corrective actions by developing draft policies.

Recommendation

We recommend that the Director of the Communications Technology Laboratory and the NIST Boulder Laboratory Director establish, approve, issue, and train FPOs on policies and procedures that specify the roles and responsibilities of the FPO and programmatic monitoring activities to administer PSIAP grants and cooperative agreements.

Summary of Agency Response and OIG Comments

On August 13, 2018, NIST responded to the draft report (see appendix C). NIST concurred with our finding, addressed our recommendation, and reported that it had begun implementing corrective action. As stated in NIST’s response, “PSCR has implemented new and improved award monitoring systems for PSIAP [FPOs],” “developed the PSIAP FPO Handbook to define award management roles and responsibilities,” and “developed and issued a written Standard Operating Procedures (SOP) for conducting award recipient site visits of a technical nature.” NIST also stated that it has trained FPOs on the new SOP. The final report will be posted on OIG’s website pursuant to sections 4 and 8M of the Inspector General Act of 1978, as amended (5 U.S.C. App., §§ 4 & 8M).

In accordance with Department Administrative Order 213-5, please submit, within 60 calendar days, an action plan that responds to our recommendation.

We appreciate the cooperation and courtesies extended to us by your staff during our audit. If you have any questions or concerns about this report, please contact me at (202) 482-3884 or Chris Rose, Supervisory Auditor, at (202) 482-5558.

CC: Dereck Orr, Division Chief, Public Safety Communications Research Division
Amy Egan, Audit Liaison
Catherine Fletcher, Audit Liaison

²⁰ Ibid., 29, 46.

Appendix A: Objective, Scope, and Methodology

The objective of our audit was to assess whether NIST is appropriately using funds allocated by the Act to conduct public safety communications R&D, including NIST's management of PSIAP. In completing this objective, we evaluated the existence and effectiveness of controls for NIST's R&D program as a whole, with emphasis on NIST's establishment and execution of proper controls for managing PSIAP awards and prize challenges. To accomplish our objective we

- interviewed NIST PSCR and GMD officials and reviewed relevant documentation to assess their controls (e.g., plans, policies, procedures, and guidance) for achieving the Act's requirements and managing PSIAP awards and prize challenges;²¹
- reviewed NIST documentation to assess whether appropriate actions were taken to award and monitor PSIAP awards, including a review of documentation for a non-statistical sample of 5 out of the 33 PSIAP award recipients;²²
- reviewed documentation for a non-statistical sample of prize challenge applicants to assess whether PSCR selected prize challenge winners according to its procedures;²³
- selected a statistical sample of 50 R&D expenditures and reviewed corresponding NIST supporting documentation to assess whether expenditures were appropriate, approved, and consistent with the objectives of the Act;²⁴
- interviewed a non-statistical sample of representatives from three federal agencies and assessed whether PSCR updated the agencies on its R&D progress and established opportunities for the agencies to provide feedback;²⁵
- analyzed PSCR's overall R&D spending and spending plans to determine whether spending was reasonable;
- selected a non-statistical sample of PSIAP recipient expenditures and drawdown requests to determine whether spending was reasonable, allocable, and allowable;²⁶ and
- reviewed grant closeout policies and procedures to determine whether close-out processes were adequate.

²¹ We evaluated PSCR's controls for awarding, monitoring, and closing PSIAP awards and its selection process for awarding prize challenges.

²² To ensure our sample included a cross-section of grants and cooperative agreements, we selected a judgmental sample of awards. We based our sample selection on award amounts, federal funds drawn, special award conditions, and the type of entity (university, private, and foreign versus American). Additionally, we ensured our sample included at least one award managed by each of the FPOs. We did not project our results to the population; however, the procedures we reviewed affected all FPOs.

²³ We based our non-statistical sample selection on rejected prize challenge applicants and winning applicants.

²⁴ We did not project the results of the sample to the population.

²⁵ We based our non-statistical sample on the agencies identified in the Act. Pub. L. 112-96 § 6303, 47 U.S.C. § 1424.

²⁶ We based our sample selection on PSIAP award recipients required to obtain GMD approval before drawing down funds.

We reviewed the following laws, regulations, standards, policies, and procedures:

- Middle Class Tax Relief and Job Creation Act of 2012, Public Law 112-96, § 6303
- *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, 2 C.F.R. Part 200
- *Federal Travel Regulation*, 41 C.F.R. Part 300-304
- GAO, *Standards for Internal Control in the Federal Government* (September 2014)
- DOC, *Financial Assistance Standard Terms and Conditions* (March 2017)
- DOC, *Grants and Cooperative Agreements Manual* (October 2016)
- DOC, *Travel Policy Handbook* (October 2016)
- National Science Foundation, *Final Format Research Performance Progress Report*
- Notice of Funding Opportunity (NOFO), NIST Public Safety Innovation Accelerator Program (PSIAP) (December 2016)
- NIST PSCR and GMD internal policies and procedures

We reviewed controls significant within the context of the audit objective by interviewing NIST officials, examining relevant policies and procedures, and reviewing documentation. We reported internal control weaknesses in the “Finding and Recommendation” section of our report. In satisfying our audit objectives, we relied on both computer-processed data in NIST’s Grants Management Information System (GMIS) and documents submitted by NIST. We tested the reliability of GMIS data by comparing the data to supporting documentation and determined the GMIS data was sufficiently reliable for our audit.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform our audit to obtain sufficient, appropriate evidence that provides a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusion based on our audit objective.

We conducted our review from September 2017–March 2018 under the authority of the Inspector General Act of 1978, as amended (5 U.S.C. App.), and Department Organization Order 10-13, April 26, 2013. We performed our work at the NIST PSCR laboratory in Boulder, Colorado; OIG Headquarters in Washington, DC; and the OIG regional office in Denver.

Appendix B: PSCR's Main R&D Efforts

PSCR outlined its approach to accomplish the Act requirements in its R&D plan, *NIST's Role in the Middle Class Tax Relief and Job Creation Act of 2012*. We found, consistent with the plan, PSCR's main R&D efforts included the following:

- **Conducting Internal R&D Projects.** NIST expanded its laboratory in order to leverage (a) its existing methods for gathering public safety communications requirements and developing communications standards and (b) its existing relationships with the public safety community. Within NIST's laboratories, it has conducted, or is in the process of conducting, several R&D projects in order to address the public safety communications topics it identified as the most critical. NIST officials stated that they are conducting approximately 30 internal R&D projects.
- **Developing and Overseeing PSIAP Award Projects.** PSCR leverages PSIAP award funding opportunities via grants and cooperative agreements "to stimulate critical R&D, advanced engineering, and product development in key technology focus areas" and to provide a platform for working with public safety agencies, academic researchers, and industry partners to support its mission of accelerating the advancement of public safety communications technologies.²⁷ In its funding opportunity in June 2017, NIST awarded \$38.5 million to 33 R&D projects, with awards ranging from \$164,884 to \$1.8 million. Applications were due in March and April 2018 for two other funding opportunities.
- **Developing and Executing R&D Prize Challenges.** Under the authority of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Reauthorization Act of 2010,²⁸ PSCR's "Open Innovation Prizes & Challenges" program focuses on "advancing public safety communications by leveraging the expertise and innovative solutions for a diverse array of contributors and collaborators across the globe."²⁹ PSCR has completed two prize challenges.
- **Consulting with Relevant Public Safety Stakeholders.** PSCR officials meet with a diverse group of public safety communications stakeholders to assist its R&D program. PSCR conducted or participated in several consultation opportunities, including annual PSCR conferences, public safety communications summits, roundtables, and meetings with federal partners identified in the Act.

²⁷ See NIST PSCR's website at <https://www.nist.gov/ctl/pscr/grants-and-cooperative-agreements> (accessed July 9, 2018).

²⁸ Pub. L. No. 111-358 § 105, 124 Stat. 3989.

²⁹ See NIST PSCR's website at <https://www.nist.gov/ctl/pscr/funding-opportunities/prizes-challenges> (accessed July 9, 2018).

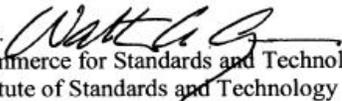
Appendix C: Agency Response



UNITED STATES DEPARTMENT OF COMMERCE
National Institute of Standards and Technology
Gaithersburg, Maryland 20899-
OFFICE OF THE DIRECTOR

AUG 13 2018

MEMORANDUM FOR Andrew Katsaros
Assistant Inspector General for Audit and Evaluation

FROM: Walter G. Copan, Ph.D. 
Under Secretary of Commerce for Standards and Technology &
Director, National Institute of Standards and Technology

SUBJECT Response to Office of Inspector General's Draft Memorandum dated July 12, 2018, *NIST Should Improve Controls for Monitoring R&D Grants and Cooperative Agreements*

This memorandum provides the National Institute of Standards and Technology (NIST) response to the draft memorandum dated July 12, 2018 from the Office of the Inspector General (OIG) entitled, *NIST Should Improve Controls for Monitoring R&D Grants and Cooperative Agreements*.

In the report, OIG identified internal control weaknesses in NIST's monitoring of award recipient performance. OIG had one recommendation for NIST:

We recommend that the Director of the Communications Technology Laboratory and the NIST Boulder Laboratory Director establish, approve, issue, and train FPOs on policies and procedures that specify the roles and responsibilities of the FPO and programmatic monitoring activities to administer PSIAP grants and cooperative agreements.

NIST concurs with the OIG's findings and appreciates their efforts to highlight areas for improvement to the PSCR's Innovation Accelerator Program.

In response to OIG audit findings, PSCR implemented new and improved award monitoring systems for PSIAP Federal Program Officers (FPOs). New procedures are supported by a suite of corresponding tools and multimedia resources designed to deepen FPOs' understanding of their roles and responsibilities, and to assist them in their day-to-day monitoring activities.

OIG conducted its audit very early in the post-award management phase of the PSIAP program, which provided us with a timely opportunity to strengthen internal controls at the start of our award programs. All PSCR staff involved in grants management have dedicated substantial time and efforts toward understanding the monitoring concerns raised by OIG and developing practical solutions.

NIST

PSCR developed the PSIAP FPO Handbook to define award management roles and responsibilities throughout the life cycle of grants and cooperative agreements. The Handbook contents include:

- Award types and FPO involvement;
- Post-competition procedures;
- Award recipient monitoring procedures;
- Procedures for documenting communications with award recipients;
- Storage of award documents.

The Handbook also lists key Department of Commerce contacts involved in grants management and links to resources and tools for PSCR FPOs.

Report evaluation forms designed for the PSIAP program are used to review periodic reports, track award recipient progress, and compare information reported between quarters and with the proposed project plans. The FPOs use the forms to track milestone completion, changes and problems, project outputs, special award conditions, training and professional opportunities.

PSCR developed and issued a written Standard Operating Procedures (SOP) for conducting award recipient site visits of a technical nature. The SOP is comprised of monitoring steps to ensure that award recipients are carrying out the technical aspects of their projects according to their award agreements with NIST, periodic reports, and communications with FPOs. The site visit procedure also serves to enhance PSCR's understanding its award recipient community and the public safety needs being addressed by the PSIAP projects.

The SOP includes a comprehensive preliminary review of documentation and information submitted by the recipient to help FPOs and the Grants Management Division (GMD) determine whether or not a site visit is necessary. If a site visit is prompted by risks of an administrative or financial nature, GMD may conduct a site visit or other follow-up monitoring activities as appropriate.

PSCR developed and trained FPOs on new protocol and forms for documenting monitoring discussions with award recipients. FPOs are required to document all monitoring calls with award recipients in a designated call log form. In-person meetings between FPOs and award recipients at PSCR's annual conference and other events are also documented using a new form. These records are stored with official award documents in GMIS.

Frequent communications and meetings between FPOs, GMD, and the DoC Federal Assistance Legal Division (FALD) have helped to clarify monitoring roles and responsibilities among FPOs. Regular correspondence and biweekly PSIAP meetings ensure that FPOs remain informed and trained on new monitoring policies.

Again, NIST appreciates the OIG's efforts and is confident their insights will help NIST improve the PSIAP.

cc: Amy Egan, NIST OIG Liaison

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