



Audit of the Office of Community Oriented Policing Services' COPS Hiring Program



AUDIT DIVISION

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EXECUTIVE SUMMARY

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Objectives

The objectives of this audit were to: (1) determine if the Office of Community Oriented Policing Services (COPS Office) made fiscal year (FY) 2021 and 2022 COPS Hiring Program (CHP) awards in accordance with applicable guidance and vetting procedures; and (2) assess COPS Office monitoring of CHP awards to ensure compliance and performance. Our audit scope included CHP applications and awards between FYs 2021 and 2022, and monitoring of CHP awards between FYs 2021 and 2023.

Results in Brief

The COPS Office made FY 2021 and 2022 CHP awards in accordance with statutory requirements to ensure a national distribution of funds, and we did not identify material concerns with the COPS Office's monitoring of CHP awards. However, some CHP applicants submitted inaccurate or insufficiently supported information in their applications, and the COPS Office's system of data validation did not consistently identify and flag these errors for additional review.

Further, the ability to hire officers engaged in community policing activities, which is the fundamental metric by which the COPS Office assesses success of the CHP, appears to be a growing challenge. In response to an Office of the Inspector General (OIG) survey of CHP recipients, 60 percent of respondents stated that hiring was a challenge for their agency. We also noted that CHP applications decreased in recent years and that program costs have shifted to CHP recipients since FY 2012. We believe that it would be beneficial for the COPS Office to initiate a review of these issues and the potential impact they may have on the continued success of the CHP.

Recommendations

Our report contains four recommendations to assist the COPS Office in administering the CHP.

Audit Results

The COPS Office administers the CHP, which is a competitive award program that provides funding directly to local law enforcement agencies (LEA) to hire or rehire career law enforcement officers in an effort to increase community policing capacity and crime prevention efforts. The CHP is the COPS Office's largest program; in FYs 2021 and 2022, the COPS Office awarded over \$278 million, representing over 35 percent of all COPS Office award funding.

Hiring Challenges, Application Decline, and Other Factors Affecting CHP Recipients

The hiring of community policing officers is the fundamental metric of success for the CHP program. However, in response to an OIG survey, 60 percent of responding CHP recipients stated that hiring was a challenge for their organization. These LEAs also struggled to retain officers once hired or to backfill positions, which are CHP program requirements.

We also found that CHP applications have significantly decreased over the last decade, with a high of 1,718 in FY 2013 to 654 in FY 2023, a decline of 62 percent. Finally, we found that program costs have shifted to CHP recipients since FY 2012, and some CHP recipients indicated this shift has posed financial challenges.

There are many potential causes for these issues. For example, a COPS Office [report](#) identified "heightened community frustration with the policing profession" and "concerns about officer safety and well-being" as factors affecting a "historic crisis in recruiting and retaining qualified candidates." Further, there is increased sensitivity and evolving public expectations regarding the policing profession. A May 2024 Congressional Research Service [report](#) to Congress noted that the COPS Office was originally funded in FY 1995 with the goal of putting 100,000 officers on the street, and that in March 2024, the

administration “requested increased funding for [CHP] to... increase the capacity of [LEAs] to implement community policing strategies that strengthen partnerships for safer communities and enhance law enforcement’s capacity to prevent, solve, and control crime.” This report also states, however, that “[p]roponents of reform argue that funding should be used for programs that address social problems, [such as] poverty, homelessness, [or] lack of access to mental health care in order to reduce involvement with the criminal justice system rather than increasing the number of police officers.”

Moreover, funding for each officer available under the CHP has not increased since 2012 and currently lags far below the national average of sworn officer salary and benefit costs. This increases the financial burden on local LEAs with CHP-funded positions, as the LEA must use its own funds to make up any difference between the amount of funding provided by the COPS Office and the amount actually needed to hire an officer.

We believe that it would be beneficial for the COPS Office to evaluate the current state of the CHP and the factors impacting its success and, in coordination with the Department, identify and pursue potential options that would improve the continued viability of the program.

Application Submission Errors and Data Validation

Through our testing on the accuracy of information submitted by CHP applicants in FYs 2021 and 2022, we found that about 16 percent of sampled data points were either inaccurate or insufficiently supported, and about

42 percent of violent crime outliers from our sample were not flagged for additional review as intended by established data cleaning thresholds.

As the scoring of a CHP application is data driven, automated data validation is key to maintaining the accuracy of applicant-submitted information and the integrity of the CHP. However, revisions made by the COPS Office in 2016 substantially increased violent crime thresholds, which generally excluded some crimes from data validation. Consequently, the high thresholds omitted smaller agencies with erroneous data from verification. We discussed concerns related to application accuracy with the COPS Office during our audit, and it indicated that it would begin implementing remedial actions to mitigate the risk in upcoming award cycles.

Award Monitoring

We did not identify any material exceptions through our review of the COPS Office’s CHP monitoring files and found the system of monitoring was compliant with its monitoring requirements.

Other Considerations in the Application and Awarding Processes

We found that the COPS Office met statutory requirements to ensure a national distribution of CHP funds in FYs 2021 and 2022. Finally, we found that the COPS Office effectively coordinates with other Department of Justice components, such as the Civil Rights Division, during the application vetting process to help ensure CHP awards are not made to potentially problematic applicants.

Table of Contents

Introduction	1
OIG Audit Approach	4
Audit Results	5
Hiring Challenges, Application Decline, and Other Factors Affecting CHP Recipients.....	5
Application Submission Errors and Data Validation.....	9
Award Monitoring	13
Other Considerations in the Application and Awarding Process.....	14
Conclusion and Recommendations	15
APPENDIX 1: Objectives, Scope, and Methodology.....	16
Objectives	16
Scope and Methodology.....	16
Statement on Compliance with Generally Accepted Government Auditing Standards	16
Internal Controls.....	16
Compliance with Laws and Regulations	17
Sample-Based Testing.....	17
Computer-Processed Data	17
APPENDIX 2: Survey Results	18
APPENDIX 3: The Office of Community Oriented Policing Services' Response to the Draft Audit Report	21
APPENDIX 4: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report.....	24

Introduction

The Office of Community Oriented Policing Services (COPS Office) is responsible for advancing the practice of community policing by the nation's state, local, territorial, and tribal law enforcement agencies (LEA) through information and award resources. Community policing is a philosophy that promotes organizational strategies that support the systematic use of partnerships and problem-solving techniques to proactively address the immediate conditions that give rise to public safety issues such as crime, social disorder, and fear of crime.

In service of this mission, the COPS Office administers the COPS Hiring Program (CHP), a competitive award program created by the Violent Crime Control and Law Enforcement Act of 1994, that provides funding directly to local LEAs to hire or rehire career law enforcement officers in an effort to increase its community policing capacity and crime prevention efforts. The CHP is the COPS Office's largest award program. In fiscal years (FY) 2021 and 2022, the COPS Office awarded a total of \$278,613,092 through the CHP, which constituted over 35 percent of all COPS Office award funding for that 2-year period. As of its FY 2024 CHP solicitation, the COPS Office reported that the CHP had funded more than 136,000 additional officer positions for more than 13,000 state, local, and tribal LEAs since the program's inception. Between FYs 2012 and 2023, CHP grants averaged about \$130 million annually.

According to the statutory requirements, the general purpose of the CHP is to increase the number of career law enforcement officers involved in activities that are focused on interaction with members of the community and on proactive crime control and prevention. This includes the hiring and training of new, additional career law enforcement officers or the rehiring of law enforcement officers who have been laid off as a result of state, tribal, or local budget reductions for deployment in community oriented policing, with a priority on the hiring and training of military veterans.¹ As such, the COPS Office stated that it monitors and reports on the following CHP performance measures:

- The number of community policing officers or deputies funded;
- The number of LEAs that have initiated new partnerships in support of community policing; and
- To what extent COPS Office award funding has increased LEAs' community policing capacity.

In general, a CHP award supports a 5-year period of performance, comprised of 3 years of direct officer funding with time for recruitment and hiring. Since 2012, the statutory cap has been set through enacted annual appropriations bills at \$125,000 for each officer for the 3-year funding period, unless the Director of the COPS Office grants a waiver of the local match. Although this equates to approximately \$41,667 of federal funding for each officer annually, the COPS Office statute requires recipients to decrease the federal share and increase the local share during award implementation in anticipation of retaining the position with state or local funding post-award. CHP funds are limited to 75 percent of the entry-level salary and fringe benefits for each approved position, based on the applicant's current entry-level salaries for full-time officers. Any difference between the amount of funding provided by the COPS Office and the amount needed to hire an officer must be made up by the award recipient. The CHP further requires the award recipient continue funding the positions for a minimum of 12 months following the conclusion of federal

¹ 34 U.S.C. § 10381(b) (2023).

support. Therefore, the CHP has two key requirements that necessitate a financial contribution from the award recipient.

First, there is a minimum required local match of 25 percent of the total program costs (match requirement) for the majority of CHP recipients. In recent years, this local match has often been far larger than the minimum due to increasing sworn officer salary and benefit costs: for FYs 2021 through 2022, most CHP recipients contributed an average of 57 percent of total project costs.² However, depending on available funding, the COPS Office may approve full or partial waivers of the match requirement for applicants that demonstrate severe fiscal distress, as supported by the fiscal health data provided in the application and compared to the overall CHP applicant pool. A waiver of the match requirement may also serve to waive the \$125,000 statutory cap described above.

Second, the award recipient must agree to continue to maintain the increased staffing level using state or local funds following the conclusion of federal support.³ According to CHP solicitations, LEAs must retain each CHP-funded position for a minimum of 12 months following the 3 years of funding for that position; this is referred to as the retention requirement. The additional officer positions should be added to the LEA's budget over and above the number of locally funded officer positions that would have existed in the absence of the award. Unless the awardee meets exception criteria for severe fiscal distress and is approved for a waiver, the retention requirement cannot be satisfied through attrition. LEAs that fail to retain the additional officer positions for a period of 12 months may be ineligible to receive future COPS Office awards for a period of 1 to 3 years.

To better understand the CHP from the perspective of award recipients, we conducted a survey of recipients from FYs 2021 and 2022. As shown below, about 60 percent of those who responded to our survey reported that hiring officers was a challenge for their agency.

² The calculation of the average match of 57 percent of total project costs for FYs 2021 through 2022 excludes awardees that received a match waiver.

³ 34 U.S.C. § 10382(c)(8) (2023).

Table 1

Areas in which LEAs Reported Experiencing Challenges When Implementing CHP Funding

Answers (multiple selections possible)	Responses
Hiring officers	60%
Meeting the match requirement	13%
Maintaining community partnerships	2%
Implementing the community policing plan in the chosen problem/focus area	9%
Other, please specify	15%
Not applicable; we have not experienced any challenges in implementing our CHP award	24%

Note, as respondents were able to select more than one response, the overall percentage exceeds 100 percent. See Appendix 2 for the complete survey results, including a summary of narrative answers to this question.

Source: Office of the Inspector General (OIG) Survey

Over the years, the COPS Office has sought to assist LEAs in addressing challenges in officer hiring, recruitment, and retention by holding listening sessions, promoting best practices, and providing direct technical assistance to agencies to address their recruitment and hiring challenges.⁴ For example, in April 2023, the Office of Justice Programs' (OJP) Bureau of Justice Assistance (BJA) and the COPS Office hosted an event with more than 35 law enforcement and community leaders to address current recruitment and staffing challenges, and they summarized these discussions in a 2023 [report](#).⁵ The report acknowledged that a number of significant events have led to changes in community expectations of police and other public servants, which have played a part in LEAs' struggles to attract potential applicants, fill positions left vacant by retirement, and reduce or prevent the increasing number of resignations. Although the report proposed no universal solution, it provided short-term solutions and long-term strategies for LEAs to consider, including a reevaluation of the benefits and incentives provided to their officers.

Further, policing has become an increasingly sensitive issue. A May 2024 Congressional Research Service [report](#) to Congress noted that the COPS Office was originally funded in FY 1995 with the goal of putting 100,000 officers on the street, and that in March 2024, the administration "requested increased funding for [CHP] to ... increase the capacity of [LEAs] to implement community policing strategies that strengthen partnerships for safer communities and enhance law enforcement's capacity to prevent, solve, and control crime."⁶ However, the same report notes that in recent years "[p]roponents of reform argue that funding should be used for programs that address social problems, [such as] poverty, homelessness, [or] lack of access to mental health care in order to reduce involvement with the criminal justice system rather than

⁴ The COPS Office has technical assistance resources available through the Collaborative Reform Initiative for Technical Assistance Center at <https://cops.usdoj.gov/collaborativereform> (accessed February 1, 2024).

⁵ BJA and the COPS Office, *Recruitment and Retention for the Modern Law Enforcement Agency* (2023), <https://web.archive.org/web/20250227141610/https://bja.ojp.gov/doc/recruitment-retention-modern-le-agency.pdf> (accessed March 15, 2024).

⁶ Congressional Research Service, *Community Oriented Policing Services (COPS) Program* (updated May 9, 2024), <https://crsreports.congress.gov/product/pdf/IF/IF10922> (accessed August 16, 2024).

increasing the number of police officers.” In addition, Congress has allocated funding to the COPS Office to enhance the ability of LEAs to address these issues through programs that promote enhanced crisis intervention responses, such as the Community Policing Development Program.

OIG Audit Approach

The objectives of this audit were to: (1) determine if the COPS Office made FY 2021 and FY 2022 CHP awards in accordance with applicable guidance and vetting procedures; and (2) assess COPS Office monitoring of CHP awards to ensure compliance and performance. For the second objective, our audit scope included FY 2020 and 2021 CHP awards that were monitored between FYs 2021 and 2023.

To accomplish our objectives, we reviewed policies, procedures, and manuals on CHP application and monitoring processes; interviewed COPS Office officials; ensured the CHP funding recommendations and overall monitoring met established statutory requirements; reviewed a sample of CHP applications; assessed scoring, vetting, and data validation processes; reviewed a sample of COPS Office’s monitoring of CHP awards; surveyed CHP recipients for FYs 2021 and 2022; and assessed certain aspects of the performance of the CHP as a whole. Appendix 1 contains further details on our audit objectives, scope, and methodology. The complete results of our survey can be found in Appendix 2.

Audit Results

While we found that the Office of Community Oriented Policing Services (COPS Office) complied with statutory requirements in awarding and monitoring COPS Hiring Program (CHP) awards, we also identified challenges faced by law enforcement agencies (LEA) that we believe merit focused action by the COPS Office to ensure the continued viability of the CHP. Specifically, in response to an Office of the Inspector General (OIG) survey, 60 percent of responding CHP recipients stated that hiring was a challenge for their organization. We also found that CHP applications have significantly decreased over the last decade, although the COPS Office noted that the program continues to receive significantly more applications than it has the resources to fund. Further, program costs have shifted to CHP recipients since fiscal year (FY) 2012, and some CHP recipients indicated this shift has posed financial challenges.

Through our review of CHP applications submitted in FYs 2021 and 2022, we also found that about 16 percent of sampled CHP applicant data points contained either inaccurate or insufficiently supported information, and about 42 percent of violent crime rate outliers from our sample that should have been flagged for review were not. In addition, we found that violent crime numbers on which a portion of the applications were scored had not been verified.

Hiring Challenges, Application Decline, and Other Factors Affecting CHP Recipients

During our audit, we identified challenges faced by LEAs that, while not directly related to our audit objectives, we believe merit focused action by the COPS Office.

The hiring of sworn police officers engaged in community policing activities is the fundamental metric of success for the CHP program. This goal, however, may be under pressure due to difficulties that CHP recipients reported in hiring and retaining officers. In response to an OIG survey, 60 percent of responding CHP recipients from FYs 2021 and 2022 stated that hiring was a challenge for their organization, and, as shown in the text box to the right, these LEAs reported struggles to fill authorized positions, retain officers once hired, and backfill vacancies.

We also noted that around 6 percent of LEAs that received CHP awards either declined the award after it was made or withdrew from the award without meeting the goal of hiring officers, with most citing financial limitations as the reason.

A Sample of CHP Recipient Viewpoints: Hiring and Retention

"[The] applicant pool for new officers has dwindled. New hires [are] barely keeping pace with retirements. We have stayed at 22-24 officer openings for approximately one year even following significant pay raises and retention pay in April 2023."

"Due to the difficulties of hiring and the staffing shortages, I believe it is important to have a COPS Grant that focuses on sustainability, continuing, and improving community policing. It is difficult to fill vacancies and makes it difficult to have a COPS grant focused on hiring when agencies are already struggling to hire LE Officers / Deputies."

"Having difficulty hiring officers has made it extremely challenging to implement our CHP community policing project."

"We are significantly below our regular authorized positions and have not yet been able to seek to use grant funds."

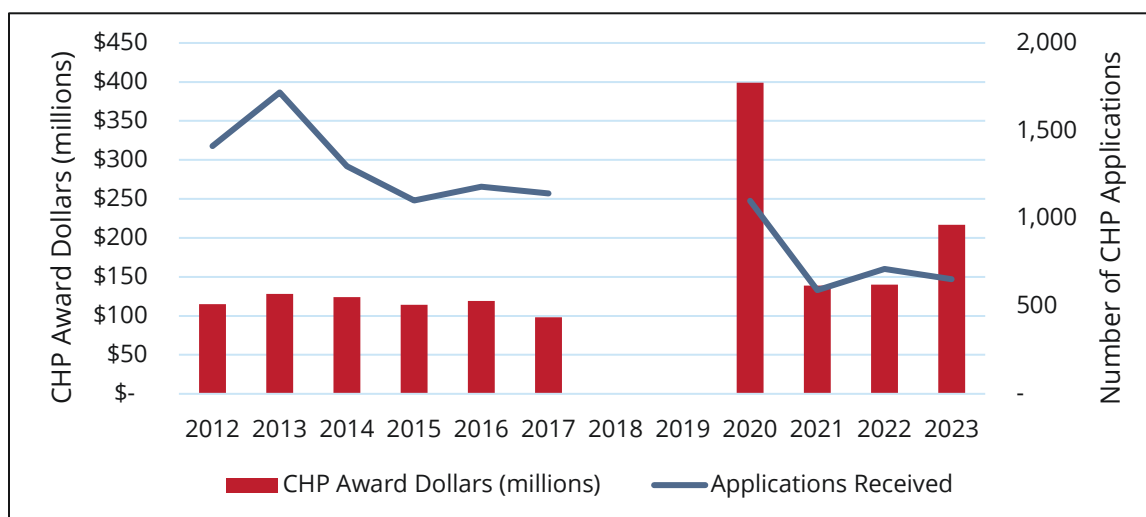
"It took our agency about 3 months to find a qualified officer."

"Recruiting has been challenging but [we were also] presented with other challenges with retention during this time."

As of October 2024, CHP recipients in our scope declined or withdrew from over \$12 million in award funds, equating to an estimated 103 fewer officers on the street.⁷ Additionally, CHP applications have significantly decreased over the last decade, with a high of 1,718 in FY 2013 to 654 in FY 2023, a 62 percent decline, as shown below. However, according to COPS Office officials, CHP remains competitive with only 364 of the 1,301 of LEA applicants receiving awards between FYs 2021 and 2022, or about 28 percent.

Figure 1

Number of CHP Applications Compared to CHP Awards from FYs 2012 through 2023



Source: COPS Office

^a The COPS Office stated that the CHP grant solicitation was placed on hold due to the issuance of a nationwide injunction by a federal district court on April 12, 2018, regarding immigration factors that were included in the 2017 CHP solicitation. This injunction was not lifted until December 2019, delaying both the FY 2018 and FY 2019 CHP appropriations. As a result, the FY 2020 award cycle includes annual appropriations for all 3 years, FYs 2018 through 2020.

There are multiple external factors, largely outside of the COPS Office’s control, that may affect the CHP. For example, in addition to the tightening labor market, a 2023 COPS Office [report](#) identified “heightened community frustration with the policing profession” and “concerns about officer safety and well-being” as factors affecting the “historic crisis in recruiting and retaining qualified candidates.”⁸ The report further stated that “[in] recent years, several significant events have led to rapid changes and shifts in community expectations of what people want from their police and other public servants” and noted that improved recruiting and retention “requires executives and hiring professionals to modernize policing from the

⁷ Although the COPS Office stated that all CHP funds that are de-obligated due to declinations and withdrawals are subsequently made available in future fiscal years for CHP awards, the OIG determined that this ultimately delays officers getting to the streets.

⁸ BJA and the COPS Office, [Recruitment and Retention for the Modern Law Enforcement Agency](https://web.archive.org/web/20250227141610/https://bja.ojp.gov/doc/recruitment-retention-modern-le-agency.pdf) (2023), <https://web.archive.org/web/20250227141610/https://bja.ojp.gov/doc/recruitment-retention-modern-le-agency.pdf> (accessed March 15, 2024).

ground up.” Suggested areas of improvement included, but were not limited to, streamlined eligibility and hiring practices; training; and benefits and incentives.

Further, a May 2024 Congressional Research Services (CRS) [report](#) to Congress indicated that the value of simply putting more officers on the street should be taken into consideration by the Department of Justice (DOJ or Department) and the COPS Office.⁹ That report stated that the COPS Office was originally funded in FY 1995 with the goal of putting 100,000 officers on the street, and that in March 2024, the administration “requested increased funding for [CHP] to... increase the capacity of [LEAs] to implement community policing strategies that strengthen partnerships for safer communities and enhance law enforcement’s capacity to prevent, solve, and control crime.” However, the CRS report also noted that “[p]roponents of reform argue that funding should be used for programs that address social problems, [such as] poverty, homelessness, [or] lack of access to mental health care in order to reduce involvement with the criminal justice system rather than increasing the number of police officers.”

The COPS Office has worked to address some of these issues within the CHP. For example, between FYs 2021 and 2024, the COPS Office gave additional consideration to LEAs committed to recruiting officers willing to relocate to areas “characterized by fragmented relations between police and community residents,” and to LEAs that required officers to complete evidence-based cultural sensitivity training. In response, the COPS Office stated that Congress has provided separate funding to enhance the ability of LEAs to address these issues in partnership with other service providers.¹⁰

There are also other factors that may be affecting the CHP. For example, COPS Office officials believe the existing funding cap of \$125,000 for each officer, for each award (the cap)—which has been set by Congress through annual appropriations bills since FY 2012—may no longer support an adequate portion of the base entry-level salary and benefits for at least 3 years and may impose a significant financial burden on many LEAs because it directly impacts the amount of their required local match.¹¹ The COPS Office also stated that the resulting higher local match may make the CHP less attractive to many LEAs and may help explain recent declines in the number of CHP applications, specifically from larger, higher-paying LEAs. Additionally, a COPS Office official noted that the cap does not account for inflation or geographical differences in the cost of living; and another COPS Office official stated that the cap—which does not account for increases to the cost of living—with economic challenges and match issues are all factors that generally serve to penalize large LEAs.

While respondents to our survey did not report issues with funding or the match requirement in high numbers, we believe it is nevertheless plausible that the lack of adjustment to the cap since 2012 may contribute to overall difficulties in hiring and meeting the match requirement. Since the inception of the CHP in 1994, the federal share has only been increased once, when in FY 2012 the cap was raised from

⁹ Congressional Research Service, [Community Oriented Policing Services \(COPS\) Program](#) (updated May 9, 2024), <https://crsreports.congress.gov/product/pdf/IF/IF10922> (accessed August 16, 2024).

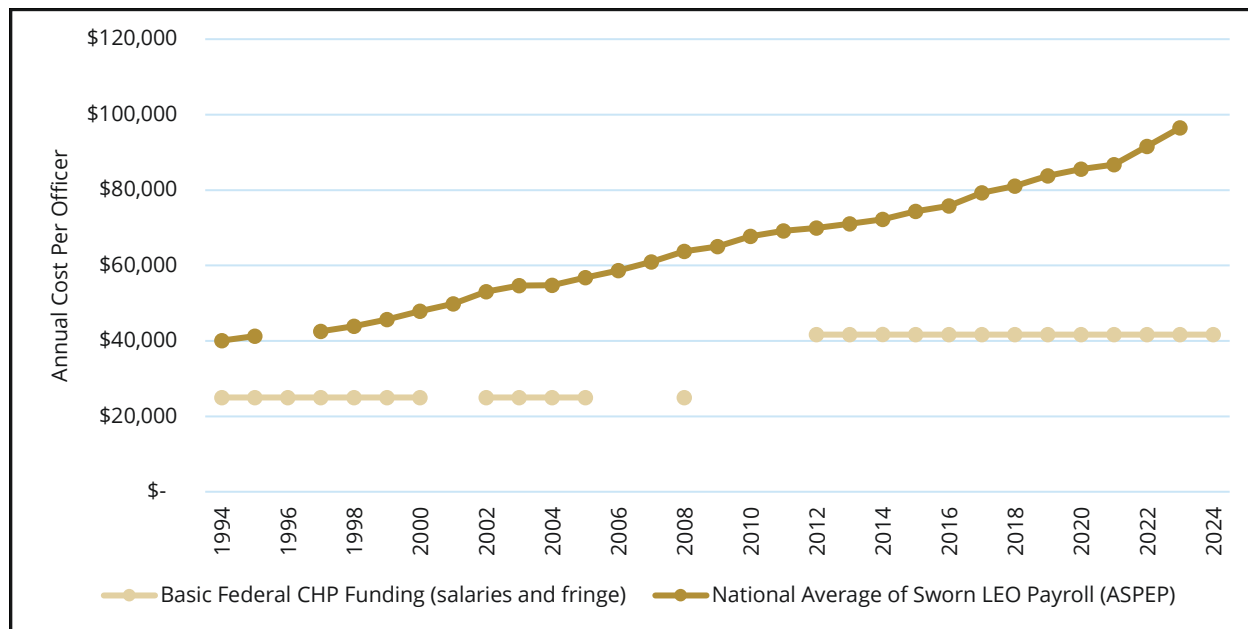
¹⁰ For example, the COPS Office has technical assistance resources available through the Collaborative Reform Initiative for Technical Assistance Center at <https://cops.usdoj.gov/collaborativereform> (accessed February 1, 2024).

¹¹ The Director of the COPS Office has authority to waive the cap and the match requirement, based on a recipient agency’s demonstration of severe fiscal distress. About 12 percent of CHP awardees received waivers in both FY 2021 and FY 2022.

\$75,000 to \$125,000.¹² Since that time, the cap has remained constant even though law enforcement payroll has risen more than 30 percent.¹³ As a result, CHP officer funding lags significantly behind national averages. The result of these dynamics is that more program costs have shifted to LEAs each award year since FY 2012.

Figure 2

CHP Annual Federal Share Compared to Trends in Law Enforcement Officer (LEO) Payroll



Source: COPS Office, U.S. Census Bureau's Annual Survey of Public Employment and Payroll (ASPEP)

^a Initially, Congress limited the maximum federal funding for each officer to \$75,000. However, the limitation was removed between FYs 2009 through 2011 with the Recovery Act. Then for FY 2012, the maximum federal funding for each officer was raised to \$125,000 for the 3-year funding period.

^b In FYs 2001, 2006, and 2007, federal appropriations did not provide funding to the COPS Office for its officer hiring program which, according to the COPS Office, was referred to as the Universal Hiring Program during these years.

^c There was no ASPEP in 1996, as the base reporting period for measuring employment and payrolls changed from October to March.

The OIG recognizes the complexity of the issues facing the COPS Office—which include LEA difficulties in recruiting officers to apply for open positions and significant staffing losses—during a complicated time for

¹² Beginning in FY 2012 and continuing through FY 2024, annual appropriations have set the cap at \$125,000 for each officer for the 3-year funding period, unless a waiver was granted.

¹³ According to the U.S. Census Bureau's ASPEP, police officers' average payroll throughout the country in 2023 increased 38 percent over 2012. Additionally, according to the U.S. Bureau of Labor Statistics, the national average of police officers' payroll rose 33 percent between 2012 and 2023.

the law enforcement profession. To help manage these complexities, we believe the COPS Office should coordinate with LEAs to better understand the specific causes of these challenges and then assess their impact on the CHP program and the COPS Office's ability to achieve success. Although the COPS Office recently issued a report on law enforcement recruitment and retention, it has not used that work to assess the future viability of the CHP program in light of those related challenges. Such an assessment may include conducting outreach to its LEA community to isolate and address specific reasons LEAs struggle to hire and retain officers under the CHP and to further understand the decrease in LEAs applying for program funds. Additionally, the COPS Office should evaluate its awardees' ability to be successful in retaining the CHP-funded officers, including the requirement to maintain the increased staffing level with local sources of funding following the conclusion of federal support, as required by statute.¹⁴ We believe that a comprehensive assessment could be beneficial to the continued viability of the CHP. Therefore, we recommend that the COPS Office assess current challenges imposed on CHP recipients (such as hiring, retention, and the \$125,000 officer funding cap), develop potential strategies to address those challenges, communicate this information to the Department and, in coordination with the Department, consider program changes that may be necessary, potentially including statutory changes, to address the viability and success level of the program.

Application Submission Errors and Data Validation

As previously noted, the OIG conducted a survey of FY 2021 and 2022 CHP recipients. Regarding the CHP application process, 40 percent of respondents indicated they experienced challenges in collecting required information, and about 60 percent indicated that the application took longer than 20 hours to complete, which is over the estimated 11.3 hours in the CHP solicitations. However, about 30 percent indicated they did not need assistance in completing the application, and 51 percent indicated that the assistance they received was good or very good. Further, the COPS Office provided survey results of CHP applicants for FYs 2021 and 2022 that indicated an overall satisfaction rating of over 70 percent through the CHP application process in those years.

CHP applicants are scored in three categories: (1) fiscal need, (2) crime, and (3) community policing, with the possibility of bonus points depending on aspects of their community policing plan. In general, the applicants that experienced more fiscal and economic distress, higher crime rates, and had more established community policing plans received higher scores and were more likely to receive an award.

As part of our audit objectives, we reviewed a judgmental sample of 40 CHP applications, 20 applications each from FY 2021 and FY 2022, and we tested the submissions within the applications (data points) related to each scoring category. This included the jurisdictional population, the inclusion of community partnerships and problem-solving in LEA business documents, number and type of partnerships, percentage of individuals in poverty, percentage unemployed, violent crime statistics, and academy training hours in cultural sensitivity and bias. Then we obtained supporting documentation from the CHP applicant and other external government sources to verify the accuracy of the applicants' assertions. We summarize the results of our testing below.

¹⁴ 34 U.S.C. § 10382(c)(8) (2023).

Table 2

Summary of CHP Application Testing

Application Year	Sampled Application Data Points	Inaccurate or Insufficiently Supported Data Points	Number of Outliers	Outliers Not Flagged
FY 2021	480	66	6	1
FY 2022	480	92	6	4
Total	960	158	12	5

Sources: OIG analysis of information provided by the COPS Office, CHP applicants, U.S. Census Bureau, U.S. Bureau of Labor Statistics, Federal Bureau of Investigation's Uniform Crime Reporting (UCR) National Incident-Based Reporting System (NIBRS), and JustGrants.

We found that about 16 percent of the data points we reviewed in our sample were inaccurate or insufficiently supported, which was approximately 14 percent for FY 2021, and 19 percent for FY 2022.¹⁵ In some cases, exceptions included LEAs' lacking a formal strategic plan or having insufficient support for officer academy training hours. However, most exceptions were related to inaccurate crime data submissions as compared to the Uniform Crime Reporting (UCR) National Incident-Based Reporting System (NIBRS).¹⁶ When we identified a discrepancy, we reached out to the LEA in attempt to determine the reason; some LEAs had not transitioned their crime reporting to NIBRS or were unsure why the discrepancy existed, while others identified errors as they reviewed our request.

The COPS Office ultimately relies on the accuracy of data that is submitted by LEA applicants. To mitigate the risk of inaccurate data influencing the CHP award allocations, the COPS Office developed an automated data validation process in 2009 that it has periodically reviewed and modified. The process consists of a data analysis module that uses a series of automated queries with established thresholds to flag outliers in the applicant-submitted data. This module includes queries on violent crime, changes in budget or staff, poverty rates, unemployment rates, differences between service and census populations, and differences between the number of positions requested compared to the budget. The automated queries compare the number of crimes reported and the JustGrants-computed crime rate (number of crimes reported per 10,000 in population) to established thresholds. If they exceed both thresholds, the number is flagged.

After anomalous data is flagged, the system generates automated emails, and applicants are provided a limited timeframe to update or confirm the accuracy of the data flagged from their application. Generally, applicants were provided 3 to 5 days and not more than one reminder to update their applications. After

¹⁵ For the application testing, we applied a variance threshold and determined a submission was inaccurate if it was off by more than 10 percent. Differences in total amounts are due to rounding.

¹⁶ The UCR is a Federal Bureau of Investigation program that has served as the national clearinghouse for the collection of data regarding crimes reported to law enforcement since 1930. On January 1, 2021, the UCR program transitioned from its legacy Summary Reporting System to NIBRS-only data collection.

the data is confirmed or updated, the list is then scored and processed in the allocation module to produce the funding recommendations.

For the 40 CHP applications in our sample, we used the COPS Office's established queries and thresholds for violent crime data to determine if JustGrants sent an automated notification to the applicants. We found no evidence of automated or manual emails in JustGrants for 5 of 12 violent crime data outliers that we identified, or about 42 percent. For example, a CHP application reported 145 rapes in a population of 87,743, when 97 was reported in NIBRS and no request to update this number was documented in JustGrants. The COPS Office reviewed application correspondence and audit logs and confirmed to us that the change request emails were not sent for the five outliers we identified. Additionally, it could not determine if the outliers were manually cleared by COPS Office staff, or if the system did not flag the response. COPS Office officials then told us that the organization would add to the JustGrants functionality in FY 2024, to include the ability to export a report of all the manually cleared application flags.

The COPS Office's automated queries have been a subject of prior OIG work. In a 2010 DOJ OIG review of the selection process for the FY 2009 COPS Hiring Recovery Program, the OIG found inaccuracies in some of the formulas that the COPS Office used to score and rank applications. Additionally, the OIG found that the COPS Office's data validation process to ensure the accuracy of violent crime data submitted by applicants was inadequate. Specifically, the OIG found that the COPS Office did not incorporate crime rates (e.g., number of crimes per 10,000 in population) into its automated queries, and that established thresholds were too high to be statistically useful.¹⁷ In response to that audit, the COPS Office took corrective action, including instituting a periodic review of data validation thresholds to ensure their usefulness.

Subsequent to the 2010 OIG report, the COPS Office stated that it later determined that crime thresholds in use in FY 2015 flagged far too many non-outlier responses. COPS Office officials further stated that it consequently increased the thresholds—both number of crimes and crime rates—based on the ninety-fifth percentile for 2015 UCR crimes and used these updated thresholds from FY 2016 through FY 2023. However, the changes resulted in the COPS Office increasing the number of crime thresholds more than 50 times the prior thresholds, on average. Through our review of application outliers for FYs 2021 and 2022, the crime statistics of burglary, aggravated assault, vehicle theft, and larceny were generally excluded from data validation as the thresholds were too high to identify any outliers for those years.

The COPS Office stated that it performed an additional detailed review of crime thresholds in FY 2021. However, it had been developed by an employee who was no longer with the COPS Office, it did not change the data validation thresholds for violent crime developed in FY 2016, and COPS Office officials stated that they were unsure of the statistics used to create the thresholds. After the OIG expressed concern that smaller entities would be excluded from data validation, the COPS Office issued a memorandum in October 2023 that detailed its intentions from the FY 2016 revisions and found issues with the data analysis module, which may have allowed LEAs with high crime numbers in relation to their relative size to not be flagged. Specifically, very high crime numbers in their data validation thresholds would overlook smaller locales with very high crime rates (i.e., number of crimes per 10,000 in population). For example, a town of 5,000 people

¹⁷ U.S. Department of Justice Office of the Inspector General, *A Review of the Selection Process for the COPS Hiring Recovery Program*, Audit Report 10-25 (May 2010), <https://oig.justice.gov/reports/COPS/a1025.pdf>, 26-29.

with 4,900 larcenies would not be identified as an outlier because it fell below the 4,934-larceny count used in the queries.

Through our review of the COPS Office's automated queries and thresholds, we found an additional area of concern. The COPS Office stated that it reviews violent crime data for the year prior to the year of application, which is also the main portion of the violent crime score. However, it had only developed an automated query for the crime data that was 2 years prior, omitting the year on which the violent crime score was based, increasing the risk of inaccurate violent crime data not being flagged before the CHP allocation module.¹⁸ We brought this to the attention of COPS Office officials, who stated in a January 2024 email that in future years data cleaning would be on both years of violent crime data.

In the same October 2023 memorandum, the COPS Office stated that the increase in the number of crimes thresholds may have resulted in a narrower range of outliers being identified through that part of the data verification process. Additionally, it stated that potential outliers outside of the ranges may have been picked up through manual data verification checks. However, we believe that, as the scoring of a CHP application is data driven, automated data validation is key to maintaining the accuracy of applicant-submitted information and the integrity of the CHP. The problems identified significantly increased the risk of applicants being scored and ranked based on erroneous violent crime numbers and rates, which in turn increased the risk that awards did not go to applicants according to established policies and procedures.

In the same October 2023 memorandum issued on its review of data validation thresholds, the COPS Office said it intended to take the following actions:

1. Conduct an analysis of 2022 and 2023 awards to determine the extent to which changes to the data cleaning queries resulted in potentially anomalous findings not being followed up on or identified through other means.
2. Conduct a comprehensive review of all the data cleaning thresholds and adjust thresholds as necessary to improve the process for identifying outliers to strengthen and improve the accuracy of applicant-provided data.

We determined that these planned corrective actions were generally reasonable. Therefore, we recommend the COPS Office: (1) complete its analysis of 2022 and 2023 awards to determine the extent to which anomalous or inaccurate application data was not flagged for review; and (2) complete its review of data cleaning thresholds and adjust thresholds as necessary to improve the process for identifying outliers to strengthen and improve the accuracy of applicant-provided data. We also recommend that the COPS Office complete updates of automated application queries to ensure the previous 2 years of violent crime data are reviewed during the application process, as planned.

Additionally, though the COPS Office stated that it periodically reviewed queries and thresholds, the issues identified had persisted since FY 2016. Despite the OIG's prior recommendations regarding data validation

¹⁸ We note that eligible educational institutions had queries and thresholds on both years of violent crime submitted in the application. However, educational institutions comprised a small percentage of applicants and awards.

and the COPS Office's responding corrective action, we continue to have concerns related to its efforts to validate CHP application submissions before funds are allocated. Therefore, we also recommend that the COPS Office develop and implement a process to periodically review and update data validation queries and thresholds to further strengthen the application review process.

Award Monitoring

While the COPS Office is responsible for awarding its grants, the COPS Office shares responsibility for monitoring awardees with the Office of the Chief Financial Officer (OCFO) within OJP. The COPS Office is responsible for performing programmatic reviews of award recipients and ensuring that the awardees meet performance expectations, whereas the OCFO is responsible for performing financial reviews of COPS Office awardees. In addition to the programmatic and financial reviews performed by the COPS Office and the OCFO, the Office of Audit, Assessment, and Management within OJP provides monitoring oversight. This audit focused on COPS Office monitoring activities such as site visits and enhanced office-based grant reviews (EOBGR).¹⁹

We reviewed a judgmental sample of 10 CHP awards from FYs 2020 and 2021 that were monitored by the COPS Office between FYs 2021 and 2023.²⁰ We then reviewed seven specific areas of CHP award monitoring that were common between site visits and EOBGRs. These included the COPS Office summary checklists, Federal Financial Reports (FFR) compared to Automated Standard Application for Payments (ASAP), financial checklists, the allowable cost worksheets, budget and actual expenditure comparisons, eligibility of hired officers, and community policing plans in comparison to the progress reports. We obtained the COPS Office monitoring files that supported the conclusions made by staff in their monitoring reports, and we did not identify any material exceptions through our review of the monitoring files and found the system of monitoring was compliant with the COPS Office's monitoring requirements.

Additionally, as part of our survey of FY 2021 and 2022 CHP recipients, we asked respondents to rate the training it received on FFRs, ASAP, performance reports, documenting community policing efforts, and tracking new hires and rehires. Most responding recipients indicated that they did request training on those subjects and, for those that did, most marked the training as good or very good.

In selecting awards for monitoring and program assessments, the Director of the COPS Office must ensure that not less than 10 percent of the aggregate amount of money awarded under all award programs is selected for review.²¹ During our review of the sample of the 10 CHP awards from the COPS Office monitoring plans for FYs 2021 through 2023, we additionally compared the COPS Office's completed

¹⁹ This audit focused on more formal audit monitoring events and did not include the informal, daily work performed by the Grant Administration Division.

²⁰ As only a limited number of FY 2021 and 2022 CHP awards were monitored between FY 2021 through 2023, we expanded our testing to include FY 2020 CHP awards. None of these awards were in the retention phase at the time of COPS Office review; therefore, our review of the COPS Office's monitoring activities did not include retention-related monitoring.

²¹ 34 U.S.C. § 10109(c)(1) (2023).

monitoring plans to the amount of open and active awards for each FY and found the COPS Office met the requirement to monitor not less than 10 percent of open and active COPS Office awards for each FY.

Other Considerations in the Application and Awarding Process

In our review of the application and awarding processes, we additionally reviewed COPS Office vetting procedures for CHP awards and the statutory requirements in the awarding and national distribution of CHP funds. Although we did not identify exceptions in these areas of testing and review, we detail our results below.

As part of its applicant vetting process, the COPS Office makes requests to other DOJ components such as DOJ's Civil Rights Division, Criminal Division, OIG, the Public Integrity Section, the U.S. Attorney's Offices, and the Office for Civil Rights at OJP. Specifically, the COPS Office provides an overview of the CHP and a list of potential awardees and requests that each component notify the COPS Office of any reason why an award may be "inadvisable or inappropriate." We reviewed the COPS Office's external vetting policies and procedures and its communication with other DOJ components for FYs 2021 and 2022 and did not find any issues with the process. Additionally, we did not find any applicants from FY 2021 through FY 2023 on the System for Award Management exclusion list.²²

In making awards to vetted applicants, the COPS Office was required to ensure the CHP complied with two major requirements contained in the COPS Office's authorizing statutes. The first required that at least 0.5 percent of program funding be allocated to each state or territory with eligible applicants.²³ The second required that CHP award funding be equally distributed between LEAs that have a primary law enforcement jurisdiction over populations of greater than 150,000 and those that have populations of 150,000 or less.²⁴ We reviewed the listings of CHP recipients in FYs 2021 and 2022 and determined the COPS Office met both requirements to ensure a national distribution of CHP funding in FYs 2021 and 2022.

²² An exclusion identifies a party that is excluded from receiving certain types of federal financial and non-financial assistance and benefits. If an entity or any of its principals are subject to an active exclusion, it means the entity is currently debarred, suspended, proposed for debarment, or declared ineligible for the award by any federal agency.

²³ 34 U.S.C. § 10381(f) (2023).

²⁴ 34 U.S.C. § 10261(a)(11)(B) (2023).

Conclusion and Recommendations

While we found that the COPS Office complied with statutory requirements in awarding and monitoring CHP awards in FYs 2021 through 2023, we believe that a comprehensive assessment of the challenges faced by CHP recipients could be beneficial to the continued viability of the CHP. Specifically, while hiring is the fundamental metric by which the COPS Office assesses success of the CHP, 60 percent of CHP recipients that responded to an OIG survey stated that hiring was a challenge for their organization. These LEAs also struggled to retain officers once hired and to backfill vacant positions. We also found that CHP applications have significantly decreased over the last decade, declining by 62 percent. Further, we found that program costs have shifted to CHP recipients since FY 2012 and some CHP recipients indicated that CHP awards posed financial issues. Given these circumstances, we believe that it will be beneficial for the COPS Office to identify the underlying causes of these issues and their impact on the future of the CHP.

Additionally, through our review of CHP applications submitted in FYs 2021 and 2022, we found that about 16 percent of sampled CHP applicant data points contained either inaccurate or insufficiently supported information, and about 42 percent of violent crime outliers from our sample that should have been flagged for review were not. We also found that violent crime numbers on which a portion of the applications were scored were not verified. Therefore, we make the following recommendations to enhance the administration of the CHP.

We recommend that the COPS Office:

1. Assess current challenges imposed on CHP recipients (such as hiring, retention, and the \$125,000 officer funding cap), develop potential strategies to address those challenges, communicate this information to the Department and, in coordination with the Department, consider program changes that may be necessary, potentially including statutory changes, to address the viability and success level of the program.
2. Complete its analysis of 2022 and 2023 awards to determine the extent to which anomalous or inaccurate application data was not flagged for review; and to complete its review of data cleaning thresholds and adjust thresholds as necessary to improve the process for identifying outliers to strengthen and improve the accuracy of applicant-provided data.
3. Complete updates of automated application queries to ensure the previous 2 years of violent crime data are reviewed during the application process, as planned.
4. Develop and implement a process to periodically review and update data validation queries and thresholds to further strengthen the application review process.

APPENDIX 1: Objectives, Scope, and Methodology

Objectives

The objectives of this audit were to: (1) determine if the Office of Community Oriented Policing Services (COPS Office) made fiscal year (FY) 2021 and 2022 COPS Hiring Program (CHP) awards in accordance with applicable guidance and vetting procedures; and (2) assess COPS Office monitoring of CHP awards to ensure compliance and performance.

Scope and Methodology

In general, our audit scope included the application review and awarding of CHP funding years 2021 and 2022, and the monitoring of 2020 through 2021 CHP awards that occurred between FYs 2021 and 2023. To accomplish our objectives, we reviewed policies, procedures, and manuals on CHP application and monitoring processes; interviewed COPS Office officials; ensured the CHP funding recommendations and overall monitoring met established statutory requirements; reviewed a judgmental sample of CHP applications; assessed scoring, vetting, and data validation processes; reviewed a sample of COPS Office's monitoring of CHP awards; and assessed certain aspects of the performance of the CHP as a whole.

Additionally, we distributed an anonymous survey to 344 FY 2021 and FY 2022 CHP award recipients to obtain feedback on the application process and challenges faced in implementing their awards.²⁵ The survey was open from September 25 to October 13, 2023. We received 93 responses (87 responses that were fully completed), with a response rate of around 27 percent.

Statement on Compliance with Generally Accepted Government Auditing Standards

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

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of the COPS Office to provide assurance on its internal control structure as a whole. COPS Office management is responsible for the establishment and maintenance of internal controls in accordance with Office of Management and Budget Circular A-123. Because we do not

²⁵ Although 364 CHP awards were recommended for funding between FYs 2021 and 2022, 18 CHP recipients received awards in both FYs 2021 and 2022 and we removed duplicate contacts from the count. Additionally, two entities did not list the award administrator contact. Therefore, we had a total of 344 survey recipients.

express an opinion on the COPS Office's internal control structure as a whole, we offer this statement solely for the information and use of the COPS Office.²⁶

In planning and performing our audit, we identified internal control components and underlying internal control principles as significant to the audit objectives. Specifically, we assessed the design, implementation, and operating effectiveness of internal controls to the extent necessary to address the audit objectives. The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to those internal control components and underlying principles that we found significant to the objectives of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Compliance with Laws and Regulations

In this audit we also tested, as appropriate given our audit objectives and scope, selected transactions, records, procedures, and practices, to obtain reasonable assurance that the COPS Office's management complied with federal laws and regulations for which non-compliance, in our judgment, could have a material effect on the results of our audit. Our audit included examining, on a test basis, the COPS Office's compliance with the following laws and regulations that could have a material effect on the COPS Office's operations:

- 34 U.S.C. §§10381–10389

This testing included interviewing auditee personnel, analyzing CHP award data by state and size of the population the law enforcement agency serves, and completed monitoring plans. However, nothing came to our attention that caused us to believe that the COPS Office was not in compliance with the aforementioned laws and regulations.

Sample-Based Testing

To accomplish our audit objectives, we performed sample-based testing for FY 2021 and FY 2022 CHP applications, and monitoring of FY 2020 and FY 2021 CHP awards that were monitored by the COPS Office between FYs 2021 and 2023. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the areas we reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

Computer-Processed Data

We obtained information from the following systems: Department of Justice's (DOJ) JustGrants; DOJ's Data Management, Reporting, and Analytics; COPS Office's Grant Monitoring Information System; the Federal Bureau of Investigation's Uniform Crime Reporting National Incident-Based Reporting System, and Summary Reporting System; U.S. Census data and Annual Survey of Public Employment and Payroll; and U.S. Bureau of Labor Statistics' Local Area Unemployment Statistics and Occupational Employment and Wages Statistics. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

²⁶ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: Survey Results

Between September 25 and October 13, 2023, the Department of Justice Office of the Inspector General (OIG) deployed an anonymous online survey to 344 COPS Hiring Program (CHP) recipients from fiscal years (FY) 2021 and 2022. We received 93 responses to our survey, a response rate of 27 percent. In general, we sought to obtain the recipients' views on the application process, award management, and the implementation of their awards. Additionally, the OIG identified trends in the narrative responses. The complete results of the survey are detailed below.

Question 1: How would your law enforcement agency rate the CHP application process? Mark one answer for each row.

Table A2.1²⁷

	Very easy	Easy	Neither easy nor difficult	Difficult	Very difficult	Did not apply this year
FY 2021	6%	14%	26%	15%	8%	32%
FY 2022	7%	15%	31%	18%	9%	20%

Question 2: When obtaining data for the CHP award application, in which areas did your law enforcement agency experience challenges, if any? Mark all that apply.

Table A2.2

Answers (multiple selections possible)	Responses
Budget information	12%
Population data	11%
Law enforcement officer training requirements	7%
Community policing strategy	8%
Community-based officer hire and relocation information	8%
Fiscal health (e.g., poverty, unemployment)	19%
Uniform Crime Reporting (UCR) data	8%
Other, please specify	4%
Not applicable; we did not experience any challenges in obtaining data for the CHP application	60%

Respondents were allowed to select more than one response. Therefore, the total exceeds 100 percent. There were three responses of "Other, please specify." Specifically, one respondent reported challenges with accessing the application portal, one respondent reported limitations to detail how it would address

²⁷ Throughout this report, differences in the total amounts are due to rounding. The sum of individual numbers prior to rounding may differ from the sum of the individual numbers rounded.

program requirements, and finally one respondent reported the application process was lengthy in comparison to the award amount.

Question 3: In total, about how many hours did it take your law enforcement agency to prepare for and complete the CHP application? Mark one answer for each FY. Include research, obtaining figures, data entry, etc.

Table A2.3

	Less than 10 hours	Between 10 and 19 hours	Between 20 and 29 hours	Between 30 and 40 hours	More than 40 hours	Cannot estimate hours
FY 2021	16%	22%	19%	19%	16%	9%
FY 2022	13%	23%	17%	25%	14%	7%

Question 4: How would your law enforcement agency rate the quality of assistance it received from the Office of Community Oriented Policing Services (COPS Office) during the CHP application process? Mark one answer for each FY.

Table A2.4

	Very good	Good	Fair	Poor	Very poor	Did not request assistance
FY 2021	28%	19%	16%	5%	2%	31%
FY 2022	33%	21%	17%	0%	4%	24%

Question 5: How would your law enforcement agency rate the training it received for each of the following aspects of CHP award management? Mark one answer for each row.

Table A2.5

	Very good	Good	Fair	Poor	Very poor	Did not request assistance
Submitting Federal Financial Reports (FFR)	10%	23%	12%	8%	4%	44%
Requesting payments through the Automated Standard Application for Payments (ASAP)	10%	23%	13%	7%	7%	40%
Submitting performance reports	9%	25%	18%	11%	5%	33%
Documenting community policing efforts	8%	21%	15%	8%	2%	45%
Tracking CHP hires/rehires	7%	20%	12%	7%	4%	50%

Question 6: When implementing the CHP award, in which areas did your law enforcement agency experience challenges, if any? Mark all that apply.

Table A2.6

Answers (multiple selections possible)	Responses
Hiring officers	60%
Meeting the fund match requirement	13%
Maintaining community partnerships	2%
Implementing the community policing plan in the chosen problem/focus area	9%
Other, please specify	15%
Not applicable; we have not experienced any challenges in implementing our CHP award	24%

Respondents were allowed to select more than one response. Therefore, the total exceeds 100 percent. Of the 85 that responded to this question, 13 selected “Other, please specify” for experiencing challenges in implementing the CHP award, and 12 provided a comment. Of these 12 comments, six respondents indicated challenges with hiring and retention, two respondents indicated avoiding supplanting, one respondent indicated a lack of communication from COPS Office award management, one respondent indicated issues with tracking expenditures, one respondent indicated issues using the online system, and one respondent indicated that they selected too many focus areas.

Question 7: Is there anything else you would like to tell us about the application process, award management, or implementation of the CHP award?

Table A2.7

Answer	Responses
No	75%
Yes, please provide a narrative response	25%

The narrative response was optional, and 21 provided a response. Most comments related to the design of the systems for applying to the CHP award and award management in general, followed distantly by hiring and attrition issues. The rest of the responses related to system access, reporting, match waivers, CHP guidance, ASAP payments, and inexperience in applying for a grant.

APPENDIX 3: The Office of Community Oriented Policing Services' Response to the Draft Audit Report



U.S. DEPARTMENT OF JUSTICE
OFFICE OF COMMUNITY ORIENTED POLICING SERVICES
Office of the Director
145 N Street, N.E., Washington, DC 20530



MEMORANDUM

TO: Jason R. Malmstrom
Assistant Inspector General for Audit
Office of the Inspector General

FROM: Cory D. Randolph
Deputy Director
Office of Community Oriented Policing Services

DATE: May 6, 2025

SUBJECT: Draft Audit Report - Audit of the Office of Community Oriented Policing Services Hiring Program

This memorandum is in response to the Office of the Inspector General's (OIG) draft audit report entitled, "Audit of the Office of Community Oriented Policing Services Hiring Program", dated April 15, 2025. The draft audit report contains 4 recommendations. The Department of Justice (DOJ) Office of Community Oriented Policing Services (COPS) appreciates the work of the OIG and has carefully considered the findings and recommendations presented in OIG's draft report. Below please find our response to each recommendation.

Recommendation 1. Assess current challenges imposed on CHP recipients (such as hiring, retention, and the \$125,000 officer funding cap), develop potential strategies to address those challenges, communicate this information to the Department and, in coordination with the Department, consider program changes that may be necessary, potentially including statutory changes, to address the viability and success level of the program.

The COPS Office concurs with this recommendation.

The COPS Office will review the CHP program requirements and the challenges faced by CHP recipients, including hiring, retention, and the \$125,000 per officer funding cap set by appropriations, and develop strategies to address those challenges. Based on this review, the COPS Office will recommend changes, as appropriate, and will communicate the recommended changes to CHP through the Department for consideration and action. It is important to note that Law enforcement organizations have historically experienced sworn officer hiring and retention challenges, and that these challenges are unique to an agency's location, size, and budget issues and unrelated to CHP program requirements. The COPS Office will provide the status of this corrective action in its next update.

ADVANCING PUBLIC SAFETY THROUGH COMMUNITY POLICING

Recommendation 2. Complete its analysis of 2022 and 2023 awards to determine the extent to which anomalous or inaccurate application data was not flagged for review; and to complete its review of data cleaning thresholds and adjust thresholds as necessary to improve the process for identifying outliers to strengthen and improve the accuracy of applicant-provided data.

The COPS Office concurs with this recommendation.

The COPS Office will take the actions necessary to strengthen and improve the accuracy of applicant-provided data. The analysis of the 2022 and 2023 awards to determine the extent to which anomalous or inaccurate application data was not flagged for review will be completed, and a process to periodically conduct an analysis of future application data will be incorporated into the COPS Office standard operating procedures. In addition, the COPS Office will incorporate the periodic review of data cleaning thresholds into its standard operating procedures to ensure that adjustments are made, when necessary. To date, the COPS Office has implemented the JustGrants functionality to export a report of all the manually cleared application flags, including the notes/justifications for clearing the flags. This JustGrants report will be used to ensure cleared application flags were properly addressed. The COPS Office will provide the status of this corrective action in its next update.

Recommendation 3. Complete updates of automated application queries to ensure the previous 2 years of violent crime data are reviewed during the application process, as planned.

The COPS Office concurs with this recommendation.

The COPS Office completed updates to the automated application queries to resolve potential weaknesses in the current thresholds for the queries. We have ensured that the previous 2 years of violent crime data are reviewed during the application process. Please see the attached memo with supporting documentation from JustGrants. We believe this is responsive to this recommendation, and we are requesting that Recommendation 3 be closed upon the issuance of the Final Report.

Recommendation 4. Develop and implement a process to periodically review and update data validation queries and thresholds to further strengthen the application review process.

The COPS Office concurs with this recommendation.

The COPS Office will further strengthen the application review process by incorporating a process to periodically review and update data validation queries and thresholds into the COPS Office standard operating procedures. The COPS Office will provide the status of this corrective action in its next update.

Mr. Jason R. Malmstrom
May 6, 2025
Page 3

The COPS Office thanks the Office of the Inspector General for the opportunity to review and respond to this draft audit. If you have any questions, please contact Donald Lango at (202) 616-9215. If I may be of further assistance to you, please do not hesitate to contact me.

encl.

cc: Louise Duhamel
Assistant Director, Audit Liaison Group
Justice Management Division

Shanetta Cutlar, Senior Counsel to the Director
Office of Community Oriented Policing Services

Matthew Scheider, Ph.D. Assistant Director
Community Policing Advancement
Office of Community Oriented Policing Services

Brenda Worthington, Assistant Director
Grants Administration Division
Office of Community Oriented Policing Services

Kimberly Rice
Regional Audit Manager, Denver Regional Audit Office
Office of the Inspector General

APPENDIX 4: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The Office of the Inspector General (OIG) provided a draft of this audit report to the Office of Community Oriented Policing Services (COPS Office). The COPS Office response is incorporated in Appendix 3 of this final report. In response to our audit report, the COPS Office concurred with our recommendations and discussed the actions it will implement in response to our findings. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for the COPS Office:

- 1. Assess current challenges imposed on COPS Hiring Program (CHP) recipients (such as hiring, retention, and the \$125,000 officer funding cap), develop potential strategies to address those challenges, communicate this information to the Department and, in coordination with the Department, consider program changes that may be necessary, potentially including statutory changes, to address the viability and success level of the program.**

Resolved. The COPS Office concurred with our recommendation. The COPS Office stated in its response that it will review the CHP program requirements and the challenges faced by CHP recipients, including hiring, retention, and the \$125,000 per officer funding cap set by appropriations, and develop strategies to address those challenges. Based on this review, the COPS Office will recommend changes, as appropriate, and will communicate the recommended changes to CHP through the Department for consideration and action. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation that the COPS Office has assessed current challenges imposed on CHP recipients (such as hiring, retention, and the \$125,000 officer funding cap), developed potential strategies to address those challenges, communicated this information to the Department and, in coordination with the Department, considered program changes that may be necessary, potentially including statutory changes, to address the viability and success level of the program.

- 2. Complete its analysis of 2022 and 2023 awards to determine the extent to which anomalous or inaccurate application data was not flagged for review; and to complete its review of data cleaning thresholds and adjust thresholds as necessary to improve the process for identifying outliers to strengthen and improve the accuracy of applicant-provided data.**

Resolved. The COPS Office concurred with our recommendation. The COPS Office stated in its response that it will take the actions necessary to strengthen and improve the accuracy of applicant-provided data. It stated that it will complete the analysis of the 2022 and 2023 awards to determine the extent to which anomalous or inaccurate application data was not flagged for review, and it will incorporate a process to periodically conduct an analysis of future application data into the COPS Office standard operating procedures. In addition, the COPS Office will incorporate the periodic

review of data cleaning thresholds into its standard operating procedures to ensure that adjustments are made, when necessary. The COPS Office also stated that, to date, it has implemented the JustGrants functionality to export a report of all the manually cleared application flags, including the notes/justifications for clearing the flags. This JustGrants report will be used to ensure cleared application flags were properly addressed. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation that the COPS Office completed its analysis of 2022 and 2023 awards to determine the extent to which anomalous or inaccurate application data was not flagged for review; and completed its review of data cleaning thresholds and adjust thresholds as necessary to improve the process for identifying outliers to strengthen and improve the accuracy of applicant-provided data.

3. Complete updates of automated application queries to ensure the previous 2 years of violent crime data are reviewed during the application process, as planned.

Closed. This recommendation is closed. The COPS Office concurred with the recommendation and provided documentation demonstrating the updated automated queries review the previous 2 years of violent crime data in the application process.

We reviewed the documentation and determined that it adequately addressed our recommendation.

4. Develop and implement a process to periodically review and update data validation queries and thresholds to further strengthen the application review process.

Resolved. The COPS Office concurred with our recommendation. The COPS Office stated in its response that it will further strengthen the application review process by incorporating a process to periodically review and update data validation queries and thresholds into the COPS Office standard operating procedures. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation that the COPS Office developed and implemented a process to periodically review and update data validation queries and thresholds to further strengthen the application review process.