



Audit of the Office of Justice Programs'
Procurement for
the JustGrants System



AUDIT DIVISION

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EXECUTIVE SUMMARY

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Objectives

The audit objectives were to assess: (1) the Office of Justice Programs' (OJP) implementation of the JustGrants transition; (2) OJP's administration of the procurement; and (3) General Dynamics Information Technology's (GDIT) performance and compliance with the terms, conditions, laws, and regulations applicable to the procurement.

Results in Brief

In 2017, Department of Justice (DOJ) leadership directed OJP, the Office on Violence Against Women (OVW), and the Office of Community Oriented Policing Services (COPS Office)—collectively referred to in this report as “the Components”—to utilize a single grants management system. In February 2020, OJP entered into a \$250 million blanket purchase agreement (BPA) with GDIT that included operations and maintenance services for multiple existing technology systems and development, modernization, and enhancement of new information technology (IT) application capabilities. OJP then issued orders to GDIT under this BPA to assist the Components in transitioning to a single system, later named JustGrants.

Development efforts to build JustGrants began in April 2019 under a predecessor contract, which was replaced by the BPA. However, significant development work under the BPA did not begin until May 2020, just 5 months before the systems being replaced would become obsolete. To meet the deadline, OJP drastically reduced the number of planned system features that would be available at launch and was not able to sufficiently test the features that were released, which created an ineffective launch. When JustGrants went live, technical issues prevented the Components from making awards in a timely manner and some award recipients were unable to submit required reports, which compromised the Components' oversight. OJP has since remedied many of the critical issues and fiscal year (FY) 2022 awards were

made in a timely manner. As of February 2023, OJP continues to resolve technical issues and build out JustGrants. However, we identified weaknesses with OJP's contractor oversight and monitoring that resulted in non-compliance with BPA terms and conditions.

Recommendations

Our report contains four recommendations to assist OJP in administration of this BPA as well as future contracts.

Audit Results

The Components award billions of dollars through grants and cooperative agreements each fiscal year. Historically, DOJ awards were managed through two legacy systems: the Grants Management System (GMS), utilized by OJP and OVW; and NexGen, utilized by the COPS Office. In FY 2017, the Deputy Assistant Attorney General for the Justice Management Division directed the Components to implement a consolidated grants management system. DOJ also established for JustGrants a non-negotiable “go live” date of October 15, 2020, the date the Components were required to transition to DOJ's new financial system, the Unified Financial Management System (UFMS). The “go-live” date of October 15 was necessary because the transition to UFMS would render the legacy grants management systems obsolete.

To facilitate the transition, in FY 2019 OJP entered into a scope modification under an existing contract with GDIT to begin migration of grant documentation from the legacy systems into the IT platform that would serve as the foundation for JustGrants. Then on February 1, 2020, OJP awarded GDIT a \$250 million BPA to obtain enterprise-wide application development support services for OJP and supporting business organizations with the objective to “significantly improve OJP's Office of the Chief Information Officer (OCIO) operations and the OJP customer experience.” This included the continued development efforts for JustGrants using an agile model, which allowed the Components and the contractor to

adjust project requirements as necessary. As required, the Components went live with JustGrants on October 15, 2020.

OJP Could Have Better Performed Planning to Ensure Effective Delivery of BPA Requirements

We found that inadequate coordination and ineffective planning early in the process significantly affected OJP's ability to deliver JustGrants as intended. Specifically, the IT platform that was selected to serve as the foundation for JustGrants did not meet all the Components' business needs and created difficulties for its end users. Additionally, GDIT did not have necessary resources for the development work until May 2020, just 5 months before JustGrants was scheduled to launch, which slowed the development process and, in order to accelerate the development schedule, OJP authorized certain GDIT staff to work significant amounts of hours over the standard 40-hour work week. Further, to meet its deadline OJP was required to drastically reduce the number of system features it originally planned as part of the minimum viable product, and did not properly test the features that were included at launch.

Since the launch of JustGrants, OJP has improved its management of contractor staff and continues to add system features. However, as of March 2023, the Components continue to discuss desired functionality and whether any functionality identified should be built directly within JustGrants or built externally and later integrated into the system.

OJP Should Ensure Future Procurement Documents, including Solicitations and Statements of Work, Provide an Accurate Description of Need and Establish Clear Performance Metrics

In response to its solicitation, OJP received three quotes from prospective vendors. At first, OJP deemed all three prospective vendors unacceptable due to non-conforming labor categories. After that initial evaluation, rather than re-soliciting, OJP used a source selection method not disclosed in the solicitation and invited one of the three applicants, GDIT, to update its quote and ultimately awarded GDIT the BPA. Following the BPA's award to GDIT, OJP provided the task order statements of work

(SOW) to GDIT, which specified the requirements with more detail than the BPA solicitation did. Upon review of the task order SOWs, GDIT amended its quote to account for IT platform-certified staff and as a result, the average labor rate increased from about \$84 to \$158 per hour. In our judgment, a lack of detail in the BPA solicitation prevented prospective vendors from submitting accurate quotes and may have impacted OJP's ability to assess the quotes and ensure that it had selected the vendor that provided the best value.

Additionally, OJP did not adequately establish expectations for GDIT through its Quality Assurance Surveillance Plan (QASP) that would allow OJP contracting officials to effectively monitor progress for working software, a primary measure of agile projects. Rather, we found the QASP only included general measures the government typically tracks, such as monthly financial and technical reports. This limited those charged with direct oversight of the BPA and adversely impacted OJP's ability to effectively evaluate progress.

OJP Should Ensure the Duties Delegated to the Contracting Officer's Representative (COR) are Fully Executed and Documented

A COR was identified in the BPA and was delegated duties outlined in a COR appointment letter. We found the COR did not perform all duties outlined in the COR appointment letter. For example, the COR did not confirm if GDIT reviewed applicant responses in the security background questionnaire to ensure prospective employees were not debarred from working with the federal government. Additionally, we found that government furnished equipment was not adequately monitored and that the COR did not enforce the BPA requirement for obtaining signed non-disclosure agreements from contractor personnel.

OJP Should Ensure GDIT Invoiced Costs are Paid Timely

We tested financial provisions of the BPA to assess OJP's compliance with those requirements. We judgmentally reviewed 71 contractor invoices totaling \$63 million and found that OJP did not pay 27 invoices in accordance with the Prompt Payment Act.

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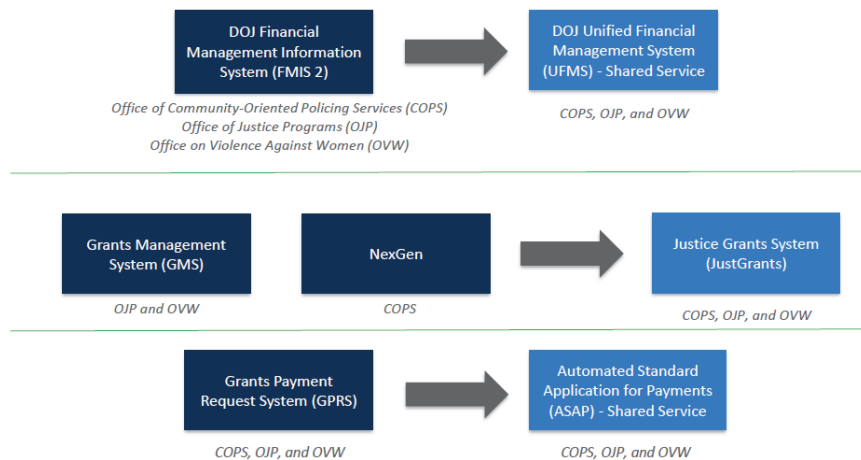
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Introduction

In Fiscal Year (FY) 2022, the Department of Justice (DOJ) awarded 5,123 grants and cooperative agreements totaling approximately \$4.9 billion through its three primary awarding components: the Office of Justice Programs (OJP), the Office on Violence Against Women (OVW), and the Office of Community Oriented Policing Services (COPS Office), collectively referred to throughout this report as “the Components.”¹ Prior to FY 2021, DOJ awards were managed through two legacy systems: the Grants Management System (GMS), utilized by OJP and OVW, and NexGen, utilized by the COPS Office. In September 2017, DOJ leadership directed the Components to consolidate systems and to utilize a single grants management system to create efficiencies and to ensure uniformity among Information Technology (IT) and administrative systems. Additionally, to comply with a long-standing DOJ directive that streamlines and standardizes financial business processes and procedures across the DOJ, the Components committed to transitioning to the Unified Financial Management System (UFMS). However, DOJ’s legacy payment system, Grants Payment Request System (GPRS), was not compatible with UFMS and this required the Components to move to the Department of Treasury’s payment system, Automated Standard Application for Payments (ASAP). To ensure compatibility, the transition to the three systems had to happen concurrently.

Figure 1

The Transition of DOJ Grant and Financial Management Systems



Source: OJP

^a The UFMS combines and replaces six core financial management systems and allows the DOJ to streamline and standardize business processes and procedures across all Components.

^b ASAP, a Department of the Treasury shared service for grant payments, replaced the GPRS for the DOJ grant-making components to allow organizations to securely draw down federal funds.

¹ The Components distribute funding through two types of agreements: (1) grants, which generally do not require substantial involvement from the Components; and (2) cooperative agreements, which generally do require substantial Component involvement. Throughout this report, we refer to grants and cooperative agreements collectively as “grants,” “grant awards,” or “awards.”

DOJ additionally established a non-negotiable launch date of October 15, 2020, for both internal and external users (i.e., Component staff and recipients of DOJ awards) to transition to the new JustGrants system. The firm transition date was necessary due to the Components' transition to UFMS, which would render other legacy financial management systems obsolete and required coordination between multiple government and contractor stakeholders for the alignment with other active federal databases.²

DOJ Components

OJP provides grants to federal, state, and local governments within the 50 states and U.S. territories through programs intended to develop the nation's capacity to reduce and prevent crimes, improve the criminal and juvenile justice systems, influence and increase the knowledge about crime and related issues, and assist crime victims in communities across the nation.

The COPS Office is responsible for advancing the practice of community policing by the nation's state, local, territorial, and tribal law enforcement agencies through information and grant resources. The COPS Office awards grants to hire officers and other community policing professionals, develop and test innovative policing strategies, and provide training and technical assistance to community members, local government leaders, and all levels of law enforcement.

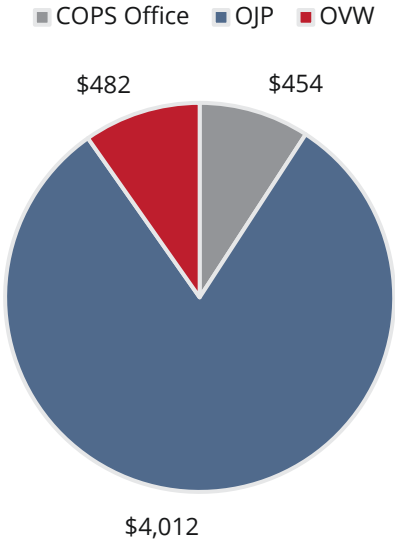
Finally, OVW provides federal leadership in developing the national capacity to reduce violence against women and administer justice for and strengthen services to victims of domestic violence, dating violence, sexual assault, and stalking. OVW administers grant programs authorized by the Violence Against Women Act of 1994 and subsequent legislation. These grant programs are designed to develop the nation's capacity to reduce domestic violence, dating violence, sexual assault, and stalking by strengthening services to victims and holding offenders accountable.

Contractor

According to the General Dynamics Information Technology (GDIT) website, it creates large-scale, secure IT networks and systems and provides professional services for U.S. defense and intelligence, state and local government, and commercial customers. Further, its website states that GDIT delivers software solutions

Figure 2

FY 2022 Grants Awarded by OJP, OVW, and COPS Office in millions



Source: OIG figure based on Component data as of February 2023.

² Other active federal databases include Grants.gov and SAM.gov. Grants.gov is a system that standardizes grant information, application packages, and processes for finding and applying for federal grants. The System for Award Management (SAM) allows entities to register to do business with the federal government, lists federal government contract opportunities, captures contractor performance, and reports contract data.

and develops strategies, architectures, and solutions to modernize IT infrastructure services, unified communications, and high-performance computing.

Background

In September 2017, DOJ leadership directed the Components to utilize a single grants management system. To comply with the DOJ directive, in September 2018 the OJP's Office of the Chief Information Officer (OCIO) selected a commercial off-the-shelf platform that would serve as the foundation for JustGrants. To begin planning and development work for JustGrants, OJP modified an existing IT contract administered by the National Institutes of Health (NIH).³ However, the NIH contract was nearing its end, and OJP preferred direct control and administration of the follow-on project. On February 1, 2020, OJP awarded GDIT a \$250 million blanket purchase agreement (BPA), the scope of which included, among other tasks, software development to continue the efforts of the NIH contract and to "significantly improve OJP's OCIO operations and the OJP customer experience."⁴ The BPA encompassed enterprise IT projects for six main areas within OJP OCIO, including design, development, and additional resources for JustGrants.⁵ As required, the Components went live with JustGrants, ASAP, and UFMS on October 15, 2020.

In addition to the \$250 million BPA to GDIT, OJP entered into other contracts and expended additional funds to assist with JustGrants-related work such as program and project management services, consulting services for strategy development and implementation, and information technology security support. The Office of the Inspector General (OIG) did not audit these contracts and primarily focused on the implementation efforts for JustGrants. We make no recommendations related to the other contracts.

OIG Audit Approach

The objectives of this audit were to assess: (1) OJP's implementation of the JustGrants transition; (2) OJP's administration of the procurement; and (3) GDIT's performance and compliance with the terms, conditions, laws, and regulations applicable to the procurement. To accomplish our objectives, we:

³ The NIH contract period of performance was from September 15, 2016, to June 14, 2020.

⁴ The BPA included a base period and four option periods, through January 31, 2025.

⁵ The six areas include: (1) technical program management, (2) enterprise application development, (3) enterprise and data architecture, (4) technology innovation, (5) web-based IT projects, and (6) identity and access management support.

Figure 3: Primary Actions Related to the Development and Implementation of JustGrants



- Reviewed DOJ's and OJP's strategy documents to determine the general implementation process for IT modernization efforts, in addition to JustGrants-specific strategy documents.
- Interviewed OJP key personnel involved with JustGrants, including the Contracting Officers (CO) and the Contracting Officer's Representative (COR).
- Reviewed policies related to acquisition, Statement of Work (SOW) deliverables, and security requirements outlined in the BPA.
- Analyzed GDIT invoices, labor categories, labor rates, and OJP's authorization of payments and compliance with the Prompt Payment Act.
- Reviewed BPA documentation including quality assurance procedures.
- Reviewed agency property records, traced purchases to property records, assessed timeliness of equipment inventory, and reviewed property management policies.
- Reviewed feedback submitted through the JustGrants helpdesk.
- Monitored internal meetings—such as team meetings between the OJP business representative, developers, and the team facilitator—and larger meetings where multiple teams coordinated, planned, and reviewed work.
- Distributed two surveys to internal and external JustGrants users. The internal survey received 296 responses (a response rate of 35 percent) and the external survey received 6,404 responses (a response rate of 21 percent). The complete survey results are included in Appendix 2.

Appendix 1 contains further details on our audit objectives, scope, and methodology.

OIG Issue Alert

On May 6, 2021, the OIG published an [Issue Alert](#) to disclose concerns identified as part of our continuous oversight of the Components.⁶ Specifically, we reported that even 6 months after the launch of JustGrants in October 2020, some users continued to experience issues registering for the system, assigning roles, and accepting awards. We noted that each of these issues can prevent award recipients from accessing DOJ funds and therefore impact the recipients' ability to achieve grant goals and objectives. Our alert identified the following causes as contributing to the reported challenges: (1) the consolidating of multiple systems that required properly registering with multiple systems; (2) new security protocols preventing migration of award recipient information; (3) educating and training award recipients on how to use the system; and (4) initial system anomalies, such as missing functions and incorrect hyperlinks. Additionally, once users were registered, some experienced issues with submitting grant documentation, including performance reports, Federal Financial Reports (FFR), award modification requests, and required award closeout information.

⁶ DOJ OIG, JustGrants Transition Impacting DOJ Awardees' Ability to Access Funds and Manage Award Activities, Issue Alert 21-069 (May 2021), <https://oig.justice.gov/sites/default/files/reports/21-069.pdf>.

Audit Results

The transition to JustGrants was a significant undertaking for DOJ, encompassing three awarding components with different business processes and requirements. The transition required integration of: (1) the DOJ's grant, financial, and payment systems outlined in Figure 1 above; (2) other active federal databases, and (3) multiple legacy systems that supported individual grant programs or assisted the Components with oversight and review.

We found that OJP's planning and development process was insufficient to meet the non-negotiable "go live" deadline, and OJP faced challenges in implementing JustGrants. When the system went live in October 2020 with only about 30 percent of planned system features completed, users were faced with significant technical issues that adversely affected their ability to administer awards and conduct necessary oversight. Further, we identified issues with OJP's administration, oversight, and monitoring of the BPA which, if improved, will assist OJP in additional IT modernization efforts under this award and with future procurements. Specifically, we found:

- BPA planning and development efforts were slow, and OJP did not award the BPA to GDIT until February 2020. OJP authorized certain GDIT staff to work significant overtime to meet task order requirements, and GDIT did not have necessary resources for the development work until May 2020, just 5 months before JustGrants was scheduled to launch.⁷ The insufficient development time contributed to the launch of a system that lacked many of the system features planned as part of the "minimum viable product" (MVP) and frustrated both internal and external users.
- The SOW in the BPA solicitation was overly broad and did not sufficiently relate to the subsequent SOWs of the task orders, resulting in significantly higher costs.
- The task orders, Quality Assurance Surveillance Plan (QASP), and monthly status reports did not identify meaningful agile metrics for assessing contractor performance.
- Inadequate oversight and monitoring led to poor tracking of Government Furnished Equipment (GFE) and non-compliance with BPA requirements.
- OJP did not pay 27 invoices in accordance with the Prompt Payment Act.

⁷ Overtime as used in this report refers to non-standard work hours where contractor staff worked more than 40 hours per week. Overtime for contractor staff was not invoiced at higher rates.

A Closer Look at Implementation: The Final Stretch

January 2020: To meet the October 2020 deadline, OJP significantly reduces system features that were needed by internal and external users.

February 2020: OJP awarded GDIT a \$250 million BPA to obtain enterprise-wide application development support services for OJP and supporting business organizations

March 2020 to August 2020: OJP authorizes contractor staff to work up to 60 hours per week in order to make progress.

August 2020: Select contractor staff were authorized to work up to 100 hours per week in order to make progress.

October 2020: JustGrants goes live, but contained significant issues and causes extreme frustration for many users. Over 5,600 helpdesk tickets are opened within the first month of launch.

The Planning and Implementation of JustGrants

DOJ issued the directive to implement a single grants management system in September 2017. In September 2018, OJP's OCIO began planning for the transition, which included purchasing the IT platform on which JustGrants would be built, migrating data from the legacy systems to the new IT platform, and contracting with IT companies to develop JustGrants. However, the \$250 million BPA to GDIT—the bulk of the development effort for JustGrants—was not awarded until February 2020, and staff did not start the majority of the development work until May 2020—just 5 months before the non-negotiable launch date.

The lack of effective planning caused multiple issues that, in our judgment, contributed to a complicated and ineffective system launch. For example, to meet the launch date, some contractor staff were authorized to work significant overtime hours—up to 100 hours per week, which included 60 hours of overtime. Notably in the base period of task order 2, we identified two subcontractor staff who charged 119.5 and 133.5 hours in a week, including an instance of charging 23 hours in a single day. According to GDIT, the accelerated development schedule and the associated overtime caused a period of higher turnover during several months in 2021. Such significant work hours should be prevented because it can also be taxing on staff and may not yield quality work products. However, as of January 2023, OJP provided evidence that BPA contractor staff levels improved, and we did not identify any indications of material staff shortages that would negatively impact BPA requirements.

Further, to launch on time, OJP was forced to significantly reduce system features that were critical parts of grant administration and oversight, and testing of those features was, by OJP's own estimation, inadequate. In some cases, users could not accept awards, access award funding, or submit financial and programmatic reporting that the Components relied upon to assess grantee performance. Ultimately, the system that went live proved to be significantly frustrating for both internal and external users, and DOJ had to repeatedly extend application, reporting, and other deadlines in order to accommodate for the system's critical deficiencies.

Initial Decisions Complicated Efforts to Transition to JustGrants, and OJP is Still in the Process of Addressing the Issues

To prepare for the transition, OJP first needed to procure the IT platform on which JustGrants would be developed. After conducting market research on viable options, OJP's OCIO selected a commercial off-the-shelf IT platform developed for government users and procured the IT platform in September 2018. While this acquisition was handled under a separate contract and is therefore not part of this audit, the consultant hired by OJP to assess the JustGrants transition found that the IT platform did not fully meet the needs of the Components, each of which has multiple grant programs with different requirements. Specifically, the consultant noted that OJP's OCIO selected the IT platform without input from OJP's business team, the officials charged with determining the needs of end users. As a result, the consultant noted "the business requirements did not drive the technology selection, rather the technology selected started to drive the requirements." The consultant also noted that, in an effort to meet its deadlines, OJP's OCIO began eliminating features in a "rushed and error-prone" manner. Ultimately, the consultant found that when JustGrants went live in October 2020, fundamental features were missing, production features did not work, and the system was "more-or-less unusable."

Findings in the consultant's report, which was issued to OJP in January 2022, corroborated many of the concerns we identified in our May 2021 Issue Alert and parallel matters we identified throughout this audit. Additionally, respondents to surveys distributed by the OIG in late March 2022 to internal and external JustGrants users provided further insight into these matters. The complete survey results are included in Appendix 2. As of February 2023, OJP stated it had completed 73 of the 91 consultant recommendations and planned to complete the remaining 18 by the end of June 2023. Many of the report's recommendations focused on the technical aspects of JustGrants and include, but are not limited to, conducting additional testing of code, establishing "release criteria" to reduce technical issues, and improving sprint management.⁸

"This system has caused tremendous issues, and the process by which it was rolled out is inexcusably problematic. I have been through other system rollouts that used the [minimum viable product] process, and while they experienced some hiccups and growing pains, they were all usable in their initial form and within a year had become high quality products. JG is STILL a poorly functioning system, and we continue to discover issues that negatively impact performance. Virtually all of these issues are avoidable, which makes it all the worse. I rarely have a meeting with a grantee that does not involve them griping about something to do with JG, and it is a continual embarrassment to my office and the department as a whole."

- Internal User Response to the OIG's Survey as of March 2022

To Deliver JustGrants on Time, OJP Reduced Features it Originally Planned as Part of the Minimum Viable Product

Software development typically is performed in two primary ways: a waterfall approach, or the agile model. Using the waterfall approach, the requirements, design, development, and testing are performed sequentially with the final product released near the end of the project. Using an agile model, requirements, design, development, and testing are performed concurrently in small increments, releasing portions of the product after short periods of time (called "sprints"). An agile model allows a business to identify, adjust, and deliver the most valuable set of features first, known as the MVP. The Government Accountability Office and industry leading practices have shown the use of agile methodologies allows for faster software development and

⁸ A sprint is a dedicated period of time in which a set amount of work will be completed on an agile project.

delivery, resulting in enhanced product value and a greater responsiveness to user needs.

To implement the transition to JustGrants, OJP intended to use an agile model and develop, test, and release products throughout the process in 2-week sprints. This model allows for flexibility within the implementation process to ensure goals are met. In March 2019, OJP finalized an outline for what it considered to be the MVP, which included all features OJP believed would be necessary at the time JustGrants went live. However, by January 2020, prior to establishing the BPA, OJP officials realized they would not be able to complete work in all areas of the MVP to meet the October 2020 launch and thus reduced the MVP scope.

OJP did not postpone the launch of JustGrants since they took a go/no-go approach and did not identify any issues that would preclude the new system from meeting their go live goal of October 2020. However, with the legacy grant management systems being obsolete as a result of the transition to UFMS, and to ensure continuity and system compatibility among JustGrants, UFMS, and ASAP, OJP prioritized financial and payment related features of the MVP and temporarily suspended work on others.

JustGrants launched in October 2020 without all features needed to support basic functionality necessary to move grant applications through the system, issue new awards, and manage existing awards.⁹ Over the course of the transition to JustGrants, many users experienced instances in which JustGrants did not perform as expected due to the technical performance issues and the system not being fully completed. To address these issues, OJP focused on stabilization efforts rather than further developing and implementing new system features.

As of March 2023, Components continue to discuss desired functionality, identifying MVP features for the sections within the grants management lifecycle, and whether features should be included as part of the JustGrants platform or separately built and integrated into JustGrants. However, OJP stated that there were no delays to the FY 2022 award season for the Components, and that JustGrants is operating as needed and supports award-making functions.

We asked OJP about the main causes of the system issues during the launch. OJP officials stated:

- There were limitations to the IT platform, which did not meet all the business needs for the necessary system features. However, because it was already committed to the IT platform with no other options, OJP identified alternate external solutions for system features that could not be incorporated into the platform.
- The scope of development work (i.e., MVP) could not be completed within the fixed amount of time.

⁹ At the October 2020 launch, only about 30 percent of system features originally planned as part of the MVP from April 2019 were completed, while other system features were partially completed and still being developed.

- Testing created a bottleneck for development teams, which pushed testing system features outside of the designated timelines for the sprints.¹⁰ As a result, technical issues were not identified until the features were in production or just before being released.
- A lack of contractor staff, and specifically IT platform-certified staff, adversely affected the rate at which system features were completed.

OJP officials informed us that project objectives did not significantly change from the original NIH contract to the BPA. Specifically, both contracts included funding for JustGrants development; however, the \$250 million BPA allowed for a significant increase in resources over the \$16.7 million designated for development work under the NIH contract. Under the NIH contract, there were 48 full-time equivalent (FTE) positions while the BPA, as awarded, had 158 FTEs applicable to the JustGrants development work.

Users Experience Issues as JustGrants Goes Live

As previously noted, DOJ awards billions of dollars in funding each year through thousands of individual grant awards. To effectively oversee these funds and ensure compliance with DOJ requirements and government-wide standards, DOJ must have a functional grants management system that allows external users to apply for awards and submit grant-related documentation.

We found that when JustGrants was launched, many basic areas of functionality were incomplete and users experienced ongoing technical issues. For example, some recipients could not submit FFRs or programmatic reports, which are used to report expenditures and grant progress to DOJ. As a result, an automatic internal control feature of JustGrants withheld award funds because recipients were not able to comply with the award reporting requirements. Users also faced challenges accepting awards and submitting requests for award modifications. These issues prevented

OIG Survey Result: JustGrants User Viewpoints on Product Rollout

Internal Survey Responses

"It was never mentioned that at the launch of the system, we would not be able to perform basic functions of award management."

"The JustGrants system that was launched lacked much of the basic functionality of GMS and resulted in staff being unable to perform their work and grant recipients being unable to access funds for long periods of time."

"Additional solutions will also be needed to properly handle performance reports as the JustGrants platform is insufficient to handle the complex reports and data required for congressional reporting, data calls, etc."

"My team was unable to perform any closeouts in JustGrants until nearly four months after JustGrants went live."

External Survey Responses

"It was my understanding that JustGrants was being "built in flight" and would become more robust over time, but certain features that I would consider to be core/basic functionality, such as the ability to print [Grant Award Modifications] and award budgets, were not available early on and still don't function fully a year and a half later."

"While it was communicated that JustGrants would provide core functionality with additional features, nothing could be farther from the truth. We have had nothing but issues with the JustGrants system..."

"I've been preparing and submitting Federal grant applications for over 20 years and have never had as bad an experience with a grants application and management system as I have with JustGrants. The first time I used JustGrants in 2021, the system malfunctioned so badly that OVW had to accept applications by email. Now over a year later it is still very difficult to use."

"The system is horrible and adds tremendous amounts of stress to our staff. Functionality is poor. Support is poor."

* The internal and external responses were provided as of March to April 2022.

¹⁰ A development team consists of a business representative from the government and contractor staff (e.g., developers, testers, and a team facilitator).

OIG Survey Result: Internal User Feedback on JustGrants

“Everyone understood that rolling out a new system would require flexibility, patience, and ingenuity. We knew it wouldn't be perfect. But the disaster that is JustGrants is far beyond normal bumps in the road. A new system should, eventually, work as well if not better than the system it replaces. But JustGrants cannot do half the things GMS could do, and its utter failure to support basic requirements shared across grant offices is a real and ongoing threat to the success of the critical victim services and public safety work our offices fund.”

“A lot of money went into this system that does not meet expectations for federal staff or stakeholders. Many grantees are very upset and have been extremely vocal about the matter.”

“I don't think the underlying system they built it on is well suited to the needs. We have had to develop countless “work-arounds” which create legal risk to accommodate the flaws in the system.”

“The decision to use an existing turnkey case management system which cannot be easily customized appears to be the fatal flaw in the entire enterprise.”

“Initially the system's development was plagued by an attitude that the different components simply needed to change their business processes – underscoring a basic lack of knowledge of the different statutory mandates which dictate how the three components and OJP bureaus do business. Furthermore, this instance [sic] that business processes be changed has raised questions about how and why this platform was selected.”

* The internal responses were provided as of March to April 2022.

Component grant managers from effectively monitoring grantee progress towards achieving award goals and objectives. In addition to the technical issues, transitioning to JustGrants was a significant change for users of the legacy systems, requiring them to properly register in SAM.gov and ASAP, and to use multi-factor authentication for identity access security. Collectively, these issues caused significant frustration for both internal and external users; a sample of feedback from those users is included in the text box to the left and on the previous page. DOJ acknowledged the issues and provided grantees multiple extensions for deadlines related to award acceptance, reporting, and closeouts. Further, DOJ announced that it would not suspend any award funds due to late report submissions. However, as described throughout this report, some issues persisted into 2022—over a year and a half after the system launch.

We also found that grant applicants were impacted when the Components experienced delays in awarding FY 2021 funding. Some delays were caused by external factors out of OJP's control—such as adjustments to solicitation award conditions required by the new administration and technical issues with the peer review process—but there were also internal issues related to JustGrants. Specifically, some system features required to process the COPS Office awards were still in development. Additionally, staff were navigating the system for the first time, which created new business practices and employees had to learn how to use the system. OJP provided notice of the impending delays to all potential award recipients on September 9, 2021. OJP worked with DOJ officials, and with OVW and the COPS Office, to prioritize the remaining FY 2021 awards and was able to issue all of them by December 31, 2021. We did not identify any substantial delays with FY 2022 awards.

To better understand the challenges faced by JustGrants users, we deployed two surveys—one for internal users (users who are employed by the Components) and one for external users (applicants and recipients of DOJ grants). In

our survey of internal JustGrants users, we asked if they had experienced technical difficulties with the system; 91 percent stated they had. We also categorized areas we believed to be common aspects of grant oversight and asked users to identify the types of technical issues they faced: (1) at the time of the launch, (2) 6 months after the launch, and (3) currently (as of March to April 2022, the time our survey was active). As shown in Figure 4 below, many internal users reported technical issues with various areas of grant oversight, and some of those challenges persisted as of April 2022, the time our survey closed.

Figure 4

Internal Users who Experienced Technical Issues

Issue Experienced	Around the Launch	6 Months Later	Currently as of March to April 2022	Not Applicable
Publishing a Solicitation	31%	29%	31%	50%
Basic Minimum Requirements (BMR)	24%	29%	22%	59%
Peer Review	24%	38%	18%	51%
Programmatic Review	35%	44%	33%	35%
Funding Recommendation	23%	44%	19%	46%
Pre-Award Budget Review	25%	35%	26%	50%
Award Package Approval Process	34%	52%	26%	32%
Performance and Financial Monitoring	41%	48%	59%	26%
Grant Award Modifications	43%	47%	54%	26%
Award Condition Modifications	38%	42%	49%	32%
Closeouts	38%	40%	46%	33%

Source: OIG survey of internal JustGrants users

^a Users may not need access to all modules in JustGrants to carry out their oversight responsibilities. Therefore, in Figures 4 and 5, we excluded modules that had a “Not Applicable” response rate of 60 percent or greater. The complete survey results are included in Appendix 2.

We also asked external users if they had experienced technical issues with JustGrants; 76 percent reported that they had, and again, some issues persisted into 2022, as shown in the following figure.

Figure 5

External Users who Experienced Technical Issues

Issue Experienced	Around the Launch	6 Months Later	Currently as of March to April 2022	Not Applicable
Registration	49%	18%	8%	41%
Accepting awards	31%	22%	13%	52%
Drawdowns / access to funds	25%	21%	15%	58%
Federal financial reports	31%	28%	17%	49%
Performance reports	32%	34%	26%	42%

Source: OIG survey of external JustGrants users

To assist users with the transition, OJP established a helpdesk to provide technical support for JustGrants users. We reviewed helpdesk data and determined that, in the first month after launch (October 2020), the helpdesk had received over 5,600 requests for assistance and the total number of requests had increased to 43,000 as of mid-November 2021. OJP worked to resolve system issues related to award recipients' ability to submit required documentation and access to DOJ funds. OJP also implemented multiple efforts such as onboarding outreach, training, and targeted technical assistance. Specifically, in August 2020, roughly 2 months prior to the launch date, OJP conducted limited user training sessions for award recipients, allowing users to access a training environment for hands-on experience and to collect feedback while discussing areas of the system. However, some OJP staff responsible for training efforts stated that the training environment contained inaccurate information and ultimately confused users. Additionally, since the JustGrants system was continuously updated, the training resources around the launch did not always align with the actual system.

“In nearly 20 years of grant application submissions and grant management, I have never seen such a confusing, hard-to-navigate, non-intuitive, cumbersome system. I called the Help Desk on multiple occasions and was on hold for an exorbitant amount of time, each and every time. The system itself was absolutely challenging. It got to the point where I created a Word document to track on a daily basis all that was going on, because I wanted some evidence to show the efforts to deal with the system in the event our grant application was not ultimately received. I had no confidence in JustGrants.”

- External User Response to the OIG’s Survey as of April 2022

helpdesk had received over 5,600 requests for assistance and the total number of requests had increased to 43,000 as of mid-November 2021. OJP worked to resolve system issues related to award recipients' ability to submit required documentation and access to DOJ funds. OJP also implemented multiple efforts such as onboarding outreach, training, and targeted technical assistance. Specifically, in August 2020, roughly 2 months prior to the launch date, OJP conducted limited user training sessions for award recipients, allowing users to access a training environment for hands-on experience and to collect feedback while discussing areas of the system. However, some OJP staff responsible for training efforts stated that the training environment contained inaccurate information and ultimately confused users. Additionally, since the JustGrants system was continuously updated, the training resources around the launch did not always align with the actual system.

Although there were issues with these initial training efforts, OJP has regularly updated its videos, guides, and other training materials since the launch of JustGrants. External users who responded to our survey reported low levels of dissatisfaction with the training provided, as shown below.

Figure 6

External User Experience with JustGrants Training

Training Activity	Very Dissatisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Very satisfied	Not Applicable
Pre-release sneak peek sessions	4%	7%	19%	18%	4%	49%
Self-paced eLearning videos	4%	8%	19%	29%	7%	33%
Reference guides	4%	10%	19%	32%	8%	27%
Quick guides	4%	9%	18%	31%	8%	30%
Presentation slide decks	4%	8%	19%	25%	6%	38%
Live office hours	4%	6%	17%	16%	5%	51%
Weekly/monthly briefing meetings	3%	5%	17%	11%	3%	61%

Source: OIG survey of external JustGrants users

^a Throughout this report, differences in the total amounts are due to rounding.

Finally, in November 2022 OJP officials reported that the continued focus on customer service and training opportunities resulted in a 40 percent reduction of service desk calls over the last year. Considering OJP's ongoing efforts, and the low levels of dissatisfaction reported as of April 2022 (the time our survey closed) we make no recommendations related to training.

The Current Status of JustGrants

As of February 2023, OJP continues to resolve technical issues and to provide training opportunities to JustGrants users. Further, OJP is focused on building out additional system functionality in the areas of performance management and monitoring to complete full grant life-cycle processing, as well as making incremental improvements to user experience, consistency, and efficiency throughout the system.

In our judgment, more effective planning early in the process could have prevented many of the issues faced by OJP and by the users of JustGrants. For example, improved coordination in selecting an IT platform that met all three Component needs may have allowed for the establishment of clearer expectations and more accurate planning for system features to be released at the launch. Further, an award process with more sufficient development time and resources may have reduced or eliminated the need to remove features originally planned as part of the MVP. As previously noted, OJP implemented 73 of the 91 consultant recommendations and has seen enhancements to the development of JustGrants, which includes but is not limited to the staffing, the sprint process, planning, and testing. Although the agile model allows for flexibility and adjustments to the process, well defined requirements are necessary to ensure program goals are met. In the following sections of this report, we provide recommendations we believe will assist in improving both the administration of the current BPA and future procurements for IT modernization efforts.

JustGrants Achievements Since October 2020

- 27,506 applications received.
- 12,797 awards made to entities totaled \$10.8 billion.
- \$11 billion drawn down by recipients.
- 70,546 performance reports and 129,819 FFRs submitted.
- 12,004 unique entities using JustGrants.

Source: OJP provided achievements as of March 2023. However, the OIG has not independently verified the information.

BPA Administration, Oversight, and Monitoring

We reviewed the acquisition and procurement process, including the original solicitation posted by OJP, modifications to that solicitation, and the associated SOWs. We found that a lack of clarity in the original solicitation and BPA as awarded resulted in significant cost increases once task orders were issued and implemented. We also identified multiple areas in which OJP was not in compliance with BPA requirements, and we found that the QASP and relevant task orders did not include meaningful metrics, which hampered OJP's ability to monitor progress.

OJP's Solicitation Lacked Detail to Better Estimate Task Order Labor Costs

In November 2019, OJP issued its solicitation and provided a request for quote to nine vendors identified based on market research. The solicitation also required vendors to complete a pricing template, which was OJP's best estimate of the anticipated labor mix and level of effort that would be utilized to complete the

requirements. The solicitation sought Enterprise-wide Application Development support services for the Components and supporting business organizations as coordinated with OJP's OCIO. The objective was to significantly improve OJP's OCIO operations and carry out responsibilities for direction, management, governance, and oversight of Enterprise-wide Application Development functions and activities including Technical Program Management, Enterprise Application Development, Enterprise & Data Architecture, Technology Innovation, Web-Based IT Projects, and Identity and Access Management Support. During the solicitation process, OJP provided the vendors two amendments. Amendment 1 was issued to answer the questions received by potential vendors and to amend the request for quote to clarify labor category descriptions, lower minimum qualifications, and reduce total hours in the pricing worksheet. Amendment 2 was issued to further amend the labor categories and again reduced the total hours in the pricing worksheet.

In December 2019, three vendors submitted quotes in response to the solicitation, and in January 2020, OJP completed its initial evaluation of the quotes. This evaluation found that all three vendors had non-conforming labor categories and deemed the quotes unacceptable. Subsequently, the Contracting Officer (CO) established a negotiation range, a type of source selection method that was not disclosed in the solicitation, to determine which vendor had the most highly rated quote with a reasonable chance of being selected for award with the purpose of continuing further communication regarding the solicitation. In an internal memorandum, OJP documented this evaluation of each vendor quote against the solicitation criteria and determined GDIT was the most reasonable compared to the other vendors. OJP also noted that GDIT's higher-rated proposal and lower-weighted average rate constituted the best value for the government. Thus, the other vendors were eliminated from the procurement process, and OJP allowed only GDIT to resubmit amended labor categories to conform with the solicitation requirements.

FAR 8.4 states the CO shall ensure all quotes received are fairly considered and an award is made in accordance with the basis for selection in the solicitation. Further, the agency is responsible for considering the level of effort and the mix of labor proposed to perform a specific task being ordered and for determining that the total price is reasonable.

Shortly after OJP determined GDIT's quote for the BPA was acceptable, OJP noticed that GDIT's pricing from its quote was lower than what they paid GDIT under the NIH contract, which provided services similar to those being solicited for the BPA. OJP followed up with GDIT to clarify its pricing and to ensure GDIT would be able to recruit and provide qualified staff to meet the BPA requirements. GDIT stated that its quote was responsive to the requirements described in the BPA, which were general and covered multiple IT modernization efforts, and emphasized that the BPA solicitation included a provision that allowed GDIT to use any labor category on its GSA schedule when developing more detailed task order proposals.¹¹ Later, OJP provided GDIT direct task order solicitations and SOWs issued under the BPA. GDIT reviewed these and submitted its quotes in response. Notably, GDIT's quotes provided new labor categories, which included IT platform-certified staff positions that were more aligned to the qualifications OJP requested in the specific

¹¹ A GSA Schedule, also known as a Federal Supply Schedule, is a long-term government-wide contract with commercial companies that provide access to products and services at discounted and negotiated rates to the government. Although GSA has already negotiated fair and reasonable pricing for items on the schedule, agencies may seek additional discounts before placing an order.

task order SOWs. This resulted in a significant increase to the average hourly labor rate, from about \$84 to \$158.¹² OJP approved GDIT's specific quotes in response to the task order solicitations.

The CO stated OJP had purposely used a broader SOW in the BPA to provide maximum flexibility while accomplishing a wide variety of work. Although the agile model allows for flexibility to adjust requirements, the significant average labor rate increase indicates that the task orders needed to implement JustGrants were considerably different than the solicitation. Furthermore, as OJP's original SOW lacked sufficient detail, prospective vendors were not able to provide accurate quotes and, therefore, this may have impacted OJP's ability to assess the quotes and ensure that it had selected the vendor that provided the best value to the government. While we did not find that OJP was non-compliant with FAR 8.4, given the lack of transparency in the source selection method and BPA SOW in the original solicitation and the resulting increase in costs, we believe OJP should work to strengthen the acquisition planning process for future awards. Therefore, we recommend that OJP enhance its solicitation process to ensure agency requirements are clear and accurate so that vendors can respond appropriately to those solicitations.

Developing Measurable Agile Metrics

FAR 46.401 states that a QASP is a tool used by the government to determine that the supplies or services conform to contract requirements, and QASPs should be prepared in conjunction with the preparation of the SOW. Further, OJP's acquisition plan stated that the COR would minimize the technical risk by ensuring that measurable and verifiable performance standards and deliverables are clearly stated in each order and by ensuring the procedures outlined in the QASP are followed throughout the performance of each order.

According to the QASP associated with the BPA, the contractor is responsible for management, quality control, and quality assurance actions to successfully meet the terms of the BPA and all orders. However, it is the government's responsibility to be objective, fair, and consistent in evaluating performance. Additionally, the QASP may be updated or revised to ensure it remains a valid, useful, and enforceable document. Through our review, we found that the QASP did not adequately establish expectations for GDIT and did not contain common agile metrics, such as tracking lead and cycle time or project velocity (i.e., the rate at which system features are completed). The QASP only included general measures the government typically tracks for contracts, such as monthly financial and technical reports. While the COR stated that the required reports were completed, the COR also expressed uncertainty regarding how to measure other QASP items such as ensuring government records were not disclosed. Further, the COR stated that a QASP that aligned with each individual task order would be more helpful than the BPA-wide QASP currently in place. We reviewed the measures contained within the individual task orders and found the same general measures described in the QASP.

Additionally, according to the QASP, the Monthly Status Report (MSR) must accurately reflect progress and status of projects, proactively identify and address any problems or issues encountered, and recommended resolutions must be feasible and likely to succeed in resolving issues. We reviewed the GDIT MSRs from June 2020 to August 2021 to assess project performance. In general, the MSRs had detailed descriptions of accomplishments, coordination, and prioritization at the feature level but it was difficult to trace measurable metrics back to working software, which is the primary measure of progress for agile projects. For example, GDIT indicated that accomplishments for a portion of the task order included completion of certain system

¹² Our analysis of the average hourly rate was for the base period of the BPA.

features, demonstrations of those features, and the validation of code in different work environments. However, the reports did not identify or include quantifiable, meaningful agile metrics to measure the working software in relation to the project as a whole.

In June 2021, GDIT developed a Quality Control Plan that identified measurable metrics focused on technical execution aspects for the project. Further, this plan reported on areas to improve program performance, such as identifying meaningful agile and quality metrics for product and process, establishing the capability to collect and analyze metrics, and engaging business owners to participate. While GDIT developed metrics for internal purposes, OJP had not asked GDIT to incorporate these agile and quality metrics into the monthly reports or the QASP as of August 2022.


OJP should have ensured its BPA included targets in order to effectively track performance. Not identifying appropriate agile metrics in the QASP and MSRs may hinder OJP's efforts to review and track specific work impacting the development of JustGrants. We discussed this issue with OJP officials, and they informed us they plan to incorporate agile metrics into the QASP and add key performance indicators as a deliverable. As of October 2022, the updates had not yet been finalized. Therefore, to ensure OJP can effectively evaluate performance under the BPA, we recommend OJP incorporate specific agile metrics into the BPA task orders, QASP, and MSRs to effectively measure performance.

COR Responsibilities



To assist the CO in the administration of the BPA, a COR was delegated duties outlined in a COR appointment letter. The COR is expected to understand those duties and maintain a file to document their actions. We tested certain provisions of the BPA to assess OJP's compliance with those requirements and identified three areas for improvement. In the table below, we outline the requirements as stated in the BPA, and the COR appointment letter; the OIG's finding; and the impact on effective BPA administration.

Table 1

COR Responsibilities

	Requirement	What We Found	Why it Matters
	<p>The COR is required to understand and manage security requirements for the BPA, which requires the contractor to pre-screen applicants and review all answers on the SF-85P to avoid unnecessary costs for government-performed security investigations.¹³</p>	<p>The COR did not confirm if GDIT reviewed the SF-85Ps. GDIT was not verifying the applicant responses, including if applicants were debarred from government employment. OJP stated that both the COR and GDIT did not have access to GDIT staffs' personal identifiable information submitted on the SF-85P.</p>	<p>The purpose of security pre-screening is to identify individuals who pose a threat to the government and avoid costly security investigations by OJP Security Staff. With the COR and GDIT both lacking the necessary access to the SF-85Ps, there is a risk that a security concern was not identified.</p>

¹³ An SF-85P is used by the government to conduct background investigations of persons under consideration for public trust positions.

	Requirement	What We Found	Why it Matters
	The COR is required to monitor Government Furnished Equipment (GFE) information and coordinate efforts with OJP's Business Resources Division (BRD).	The COR did not adequately monitor the GFE process, and OJP's BRD did not maintain clear records of GFE, did not update the asset management tracking system in a timely manner when contractors stopped working on the BPA, and did not consistently assign designated cost codes to GFE.	Without adequate tracking, there is an increased risk GFE will be misplaced or lost, increasing the likelihood of sensitive information being compromised.
	The COR was required to coordinate with the CO to ensure required non-disclosure agreements (NDAs) were submitted.	The CO and COR did not enforce the signed NDA requirement in the BPA. In September 2022, the OIG brought this to the attention of OJP. OJP officials told the OIG they determined that NDAs were not needed and were not placed at the task order level. The signed NDA requirement was not removed from the BPA until January 2023.	NDAs create a legal framework to protect ideas and information from being stolen or shared with third parties. Without enforcing the NDA requirement in the BPA, OJP risks the eventual disclosure of information that may compromise DOJ systems. Additionally, any changes to the BPA terms and conditions should be timely made in writing (i.e., BPA modification).

Source: OJP and GDIT, OIG analysis

As shown above, we found that the COR did not consistently ensure compliance with all terms and conditions of the BPA and COR appointment letter and did not maintain an adequate COR file and supporting documentation. Therefore, we recommend that OJP ensure the COR's BPA duties are fully executed as required and that documentation is maintained to support those efforts.

Prompt Payment Act

As of August 13, 2021, GDIT invoiced \$67,066,533 in labor costs under 76 invoices. In general, we found that the invoiced labor hours were supported, staff were authorized to work on the BPA, and GDIT used the approved hourly labor rates identified in the BPA and task orders, as appropriate. However, we did identify delays in OJP's payment of GDIT invoices.

FAR Subpart 32.9 requires agencies to establish policies and procedures to ensure compliance with the Prompt Payment Act, which states that the due date for making invoice payments is the later of the following: (1) the 30th day after the designated billing office receives a proper invoice from the contractor, or (2) the 30th day after government acceptance of the services provided. Additionally, it requires the government to pay contractors interest penalties when payments are late.

We requested from OJP the amount of interest paid to GDIT on the BPA. We judgmentally reviewed 71 contractor invoices totaling \$63 million and found OJP paid GDIT \$13,404 in interest on 27 invoices that took longer than 30 days to pay.

We found that no payments were made between September 24 and November 23, 2020. The COR and CO told us that some payment delays were the result of OJP's transition to UFMS that occurred in October 2020. After the UFMS system went live, the CO stated that there was a learning curve on the new system that created delays in processing invoices and some invoices could have been routed incorrectly. Of the 27 late payments, 10 occurred before the transition date and 17 occurred after the transition date, including a late payment in July 2021, 9 months after the transition. Although the \$13,404 in interest penalties is a small percentage of the overall BPA value, invoice payments should be made timely to avoid expending unnecessary funds. Therefore, we recommend that OJP enhance internal policies and procedures to help ensure compliance with the Prompt Payment Act.

Contractor Performance and Compliance

The BPA required the contractor to work with the Components to provide a wide range of organizational information technology management support services. With our focus on JustGrants, we reviewed the BPA, SOW, and associated task orders and MSRs, and monitored internal meetings to assess contractor performance.¹⁴ While OJP and GDIT were able to deliver JustGrants by the non-negotiable deadline, the system users experienced technical issues. We also determined that it was difficult to assess contractor performance in relation to working software, and we identified issues related to the reduction and delays of system features and significant use of contractor overtime. Additionally, we found GDIT did not verify employment applicant responses on the SF-85P, which includes if applicants were debarred from government employment. We cover each of these issues in more detail in previous sections of the report.

¹⁴ The OIG monitored internal meetings such as team meetings between the OJP business representative, developers, and the team facilitator and larger meetings where multiple teams coordinated, planned, and reviewed work. This monitoring occurred between March 14 and April 13, 2022.

Conclusion and Recommendations

We found that inadequate planning and development process significantly affected OJP's ability to deliver JustGrants as intended. Specifically, OJP did not award the BPA to GDIT until February 2020 or obtain necessary contractor staff for development until May 2020, just 5 months before the scheduled launch date. GDIT incurred significant amounts of overtime by staff and OJP reduced or removed features to meet the non-negotiable launch date.

Additionally, we identified a lack of detail in the SOW of the BPA solicitation, resulting in significant cost increases under the task orders. We also found that while GDIT established measurable metrics to track performance, OJP did not adequately establish expectations for GDIT through its QASP. This limited the COR's ability to provide effective oversight and adversely impacted OJP's ability to effectively evaluate progress.

Further, we found that the COR did not consistently ensure compliance with all terms and conditions of the BPA and did not maintain an adequate COR file and supporting documentation. As a result OJP: (1) did not ensure that applicant responses on the SF-85P were reviewed by GDIT, (2) did not adequately monitor GFE information, and (3) did not enforce the signed non-disclosure agreements.

Lastly, 27 invoices were not paid in accordance with the Prompt Payment Act. To this end, we make four recommendations to OJP to improve administration of the GDIT BPA and to assist with future acquisition efforts.

We recommend that OJP:

1. Enhance its solicitation process to ensure agency requirements are clear and accurate so that vendors can respond appropriately to those solicitations.
2. Incorporate specific agile metrics into the BPA task orders, QASP, and MSRs to effectively measure performance.
3. Ensure the COR's BPA duties are fully executed as required and that documentation is maintained to support those efforts.
4. Enhance internal policies and procedures to help ensure compliance with the Prompt Payment Act.

APPENDIX 1: Objectives, Scope, and Methodology

Objectives

The objectives of the audit were to assess: (1) the Office of Justice Programs' (OJP) implementation of the JustGrants transition; (2) OJP's administration of the procurement; and (3) General Dynamics Information Technology's (GDIT) performance and compliance with the terms, conditions, laws, and regulations applicable to the procurement.

Scope and Methodology

In July 2021, Senator Charles Grassley, Ranking Member of the United States Senate Committee on the Judiciary, requested the OIG conduct an audit of the creation and implementation of JustGrants due to the issues surrounding the system.

The scope of the audit covered a \$250 million blanket purchase agreement (BPA) awarded to GDIT, and generally covered but was not limited to, February 2020 to February 2023. To accomplish our objectives, we interviewed OJP key personnel involved with the JustGrants project; reviewed Department of Justice (DOJ) and OJP strategies documents to determine the implementation process; reviewed the BPA and task orders; reviewed GDIT invoices and the approved labor categories and labor rates; evaluated OJP's compliance with Prompt Payment Act; reviewed quality assurance procedures; assessed OJP's oversight of GDIT; and observed internal meetings to assess contractor performance.

We distributed two surveys to over 33,000 JustGrants internal and external users to obtain feedback on: (1) user experience with JustGrants; (2) communication and training; and (3) user testing. The surveys were open from March 28 through April 11, 2022. We received 296 responses to our survey of internal users, a response rate of 35 percent of the total population (834). For our survey of external users, we received 6,404 responses, a response rate of 21 percent of the total population (30,792). The total population for internal and external users excludes "bounced" emails and those who had opted out of receiving survey invitations.

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 OJP to provide assurance on its internal control structure as a whole. OJP's management is responsible for the establishment and maintenance of internal controls in accordance with OMB Circular A-123 and Federal Acquisition Regulations (FAR). Because we do not express

an opinion on OJP's internal control structure as a whole, we offer this statement solely for the information and use of OJP.¹⁵

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/or 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 OJP's management complied with federal laws and regulations for which noncompliance, in our judgment, could have a material effect on the results of our audit. Our audit included examining, on a test basis, OJP's compliance with the following laws and regulations that could have a material effect on OJP's operations:

- FAR Part 7: Acquisition Planning
- FAR Subpart 8.4: Federal Supply Schedules
- FAR Subpart 22.103-4: Overtime, Approvals
- FAR Subpart 52.232-7: Payments under Time-and-Materials and Labor-Hour Contracts
- FAR Subpart 32.9: Prompt Payment
- FAR Subpart 52.245-1: Government Property
- Federal Register Volume 76-84: Prompt Payment Interest Rates
- FAR Subpart 37.603: Performance Standards
- FAR Subpart 46.4: Government Contract Quality Assurance

This testing included interviewing OJP personnel and contractor staff, analyzing BPA files and related documentation, reviewing invoices and supporting documentation, assessing suspension and debarment records, evaluating OJP property records, attending internal program level meetings, and examining OJP internal policies. As noted in the Audit Results section of this report, we found that OJP did not comply with

¹⁵ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

the BPA requirements, or agency policy regarding oversight and monitoring, and FAR Subpart 32.9 Prompt Payment. Additionally, we found areas of improvement related to future procurements, monitoring and evaluating contractor performance.

Sample-Based Testing

To accomplish our audit objectives, we performed sample-based testing of invoices and payments, BPA requirements, background investigation files, internal and external JustGrants users, and OJP property records. 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

During our audit, we obtained information from DOJ's Unified Financial Management System, OJP and GDIT accounting systems, and OJP's property management system. We did not test the reliability of those systems as a whole, and therefore any findings identified involving information from those systems were verified with documentation from other sources.

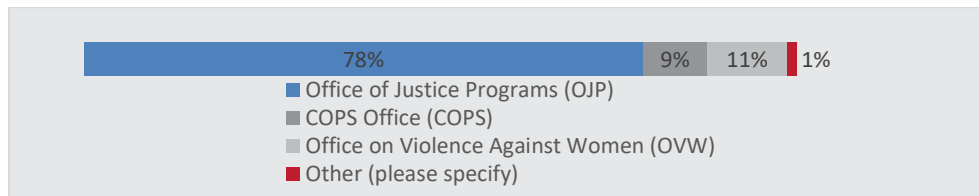
APPENDIX 2: Survey Results

Between March 28 and April 11, 2022, the DOJ OIG deployed two anonymous online surveys to over 33,000 JustGrants internal and external users. We received 296 responses to our survey of internal users, a response rate of 35 percent of the total population (834). For our survey of external users, we received 6,404 responses, a response rate of 21 percent of the total population (30,792). The total population for internal and external users excludes “bounced” emails and those who had opted out of receiving survey invitations. In general, we sought to obtain feedback on: (1) user experience with JustGrants; (2) communication and training; and (3) user testing as appropriate. The OIG created charts and graphs from the results compiled from the survey instrument. In addition, the OIG identified trends in the narrative responses. The complete results of each survey are detailed below.

Internal User Survey

Question 1: Please select which DOJ component you work for.

Figure A4.1



Note that 296 answered the question; none skipped. Throughout this report, differences in the total amounts are due to rounding.

Question 2: Do you use the JustGrants system?

Figure A4.2

Answer Choices	Responses
Yes	95%
No	5%

Note that 296 answered the question; none skipped.

Question 3: On average, what percentage of your time per month do you access the JustGrants system?

Figure A4.3

Answer Choices	Responses
25 percent or less	38%
26-50 percent	21%
Greater than 50 percent	41%

Note that 279 answered and 17 skipped the question.

Question 4: Please select the area(s) that are most applicable to your role. (Select all that apply)

Figure A4.4

Answer Choices	Responses
Publishing a Solicitation	39%
Basic Minimum Requirements (BMR)	29%
Peer Review	33%
Programmatic Review	55%
Funding Recommendation	46%
UFMS Financial Transaction Workflow	8%
Pre-Award budget Review	28%
Award Package Approval Process	53%
Performance and Financial Monitoring	62%
Grant Award Modifications	60%
Award Conditions Modifications	52%
Closeouts	56%
ASAP Account Authorization	7%

Note that 279 answered and 17 skipped the question. Additionally, the total of the responses is over 100 percent as internal users may have more than one assigned role.

Question 5: Since the October 15, 2020, launch of JustGrants, have you experienced any technical issues?

Figure A4.5

Answer Choices	Responses
Yes	91%
No	6%
Not Applicable	3%

Note that 263 answered and 33 skipped the question.

Question 6: If “Yes,” please check all the technical issues you have experienced for the applicable areas during these time periods.

Figure A4.6

	Around the Launch	6 Months Later	Currently as of March to April 2022	Not Applicable
Publishing a Solicitation	31%	29%	31%	50%
Basic Minimum Requirements (BMR)	24%	29%	22%	59%
Peer Review	24%	38%	18%	51%
Programmatic Review	35%	44%	33%	35%
Funding Recommendation	23%	44%	19%	46%
UFMS Financial Transaction Workflow	14%	18%	12%	73%
Pre-Award budget Review	25%	35%	26%	50%
Award Package Approval Process	34%	52%	26%	32%
Performance and Financial Monitoring	41%	48%	59%	26%
Grant Award Modifications	43%	47%	54%	26%
Award Condition Modifications	38%	42%	49%	32%
Closeouts	38%	40%	46%	33%
ASAP Account Authorization	16%	14%	11%	77%

Note that 263 answered and 33 skipped the question. Additionally, the total of the responses is over 100 percent as internal users may have had multiple issues at multiple times.

Question 7: If you experienced technical issues identified in the previous question, did you or your supervisor/manager access any of the available support resources (e.g., JustGrants Service Desk, JustGrants Business Representatives/Managers, JustGrants Outreach Support/“Tiger Team”) to resolve the issue?

Figure A4.7

Answer Choices	Responses
Yes	84%
No	5%
Not Applicable	11%

Note that 263 answered and 33 skipped the question.

An optional comment field was included with question 7, and 81 of the 263 respondents provided a comment. As noted above, we then identified trends in the narrative responses. For question 7, trends included 16 respondents who reported functionality limitations, 11 who said support resources were slow to respond, 8 who said they accessed the available support resources but didn’t receive any help, 8 who said they submitted a helpdesk ticket that was closed with no resolution, and 7 who commented on the inadequacy of training.

Question 8: Please rate your overall satisfaction of the user support you received from any of the available support resources (e.g., JustGrants Service Desk, JustGrants Business Representatives/Managers, JustGrants Outreach Support/“Tiger Team”) for the following areas.

Figure A4.8

	Very Dissatisfied	Dissatisfied	Neither Satisfied nor Dissatisfied	Satisfied	Very Satisfied	N/A
Timeliness of the technical support	26%	26%	17%	14%	5%	11%
Resolving the technical issues	31%	28%	15%	13%	4%	10%
Submitting a helpdesk ticket	15%	13%	22%	27%	9%	15%
Receiving walk-through instructions	19%	25%	20%	16%	4%	16%

Note that 263 answered and 33 skipped the question.

Question 9: Please select the percentage that best describes the ability to perform your duties using JustGrants during these time periods.

Figure A4.9

	Around the Launch	6 Months Later	Currently as of March to April 2022
25 percent or less	69%	11%	20%
26-50 percent	19%	58%	24%
51-75 percent	7%	37%	57%
Greater than 75 percent	8%	8%	83%
Not applicable	41%	19%	41%

Note that 263 answered and 33 skipped the question.

Question 10: Prior to using JustGrants, it was communicated to me that JustGrants would provide core functionality (e.g., a minimal viable product—MVP—using an agile approach), with additional features and functionality released over the next year and beyond.

Figure A4.10

Answer Choices	Responses
Yes	76%
No	16%
Not Applicable	8%

Note that 258 answered and 38 skipped the question.

An optional comment field was included with question 10, and 80 of the 258 respondents provided a comment. We then identified trends in the narrative responses. For question 10, trends included 40 respondents who said JustGrants

core functionality had not been reached and 11 who indicated the limited functionality was not fully communicated.

Question 11: Please rate your overall satisfaction with the following methods when technical issues were communicated.

Figure A4.11

	Very Dissatisfied	Dissatisfied	Neither Satisfied nor Dissatisfied	Satisfied	Very Satisfied	N/A
Weekly JustGrants issue and Resolution Tracker	12%	21%	29%	17%	5%	16%
Business Representative and Business Manager	10%	14%	26%	18%	11%	21%
Weekly office hour technical assistance sessions	8%	11%	27%	29%	10%	15%
Weekly/monthly JustGrants briefing sessions	10%	19%	25%	23%	12%	11%

Note that 258 answered and 38 skipped the question.

Question 12: Did you receive training for the JustGrants system (e.g., pre-release sneak peek sessions, self-paced eLearning videos, reference guides, quick guides, presentation slide decks, live office hours, and weekly/monthly briefing sessions)?

Figure A4.12

Answer Choices	Responses
Yes	87%
No	11%
Not Applicable	2%

Note that 258 answered and 38 skipped the question.

Question 13: If “Yes”, how satisfied were you with the following?

Figure A4.13

	Very Dissatisfied	Dissatisfied	Neither Satisfied nor Dissatisfied	Satisfied	Very Satisfied	N/A
Pre-release sneak peek sessions	16%	18%	23%	12%	4%	26%
Self-paced eLearning videos	15%	21%	25%	19%	5%	14%
Reference guides	12%	17%	24%	26%	7%	13%
Quick guides	10%	18%	23%	26%	8%	15%
Presentation slide decks	11%	17%	26%	22%	9%	15%
Live office hours	8%	9%	22%	27%	13%	21%
Weekly/monthly briefing meetings	10%	12%	26%	24%	11%	17%

Note that 258 answered and 38 skipped the question.

Question 14: I was given an opportunity to provide feedback on the JustGrants system functionality. If “Yes”, please share any feedback you had on the system’s functionality.

Figure A4.14

Answer Choices	Responses
Yes	42%
No	47%
Not Applicable	11%

Note that 255 answered and 41 skipped the question.

Using a provided comment field, 84 of the 255 respondents provided feedback. Specifically, 31 of the 84 who provided feedback said they reported functionality issues, 10 reported issued and felt there was no follow through on their feedback, 8 talked about how testing was limited, and 7 reported the system was not intuitive.

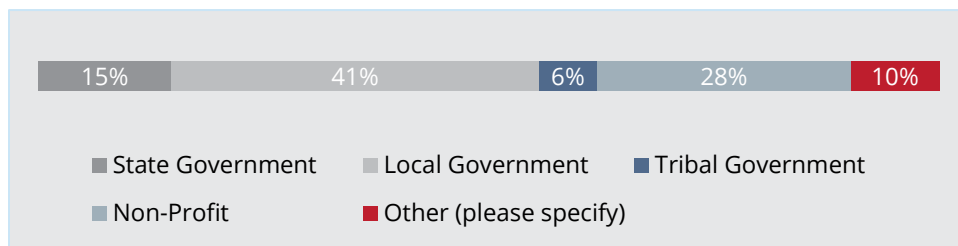
Question 15: Is there anything else you would like to share about JustGrants?

A 159 respondents provided a narrative response and 137 did not. We then identified trends in the narrative responses. For question 15, trends included 25 respondents who said the transition to JustGrants has increased their workload, 20 who said the system was not intuitive, 57 who said either the functionality, the rollout, the testing, or the training was poor, and 11 who said something positive about JustGrants.

External User Survey

Question 1: Please select your entity type.

Figure A4.15



Note that 6,404 answered the question; none skipped.

Question 2: Please select which DOJ component your entity has received an award(s) from. (Select all that apply)

Figure A4.16

Answer Choices	Responses
Office of Justice Programs (OJP)	73%
Office of Community Oriented Policing Services (COPS Office)	24%
Office on Violence Against Women (OVW)	32%

Note that 6,404 answered the question; none skipped. Additionally, the total of the responses is over 100 percent as a grantee may receive DOJ grants from more than one DOJ component.

Question 3: Please select your assigned role(s) for the JustGrants system. (Select all that apply).

Figure A4.17

Answer Choices	Responses
Entity Administrator	30%
Grant Award Administrator	48%
Grant Award Administrator - Alternate	12%
Application Submitter	33%
Authorized Representative	28%
Financial Manager	31%
Other (please specify)	3%

Note that 6,404 answered the question; none skipped. Additionally, the total of the responses is over 100 percent as the responding individual may have more than one assigned role.

Question 4: I was a previous user of:

Figure A4.18

Answer Choices	Responses
GMS	50%
NexGen	1%
Both	2%
Not applicable	47%

Note that 6,404 answered the question; none skipped.

Question 5: Do you use the JustGrants system?

Figure A4.19

Answer Choices	Responses
Yes	94%
No	6%

Note that 6,290 answered and 114 skipped the question.

Question 6: On average, what percentage of your time per month do you access the JustGrants system?

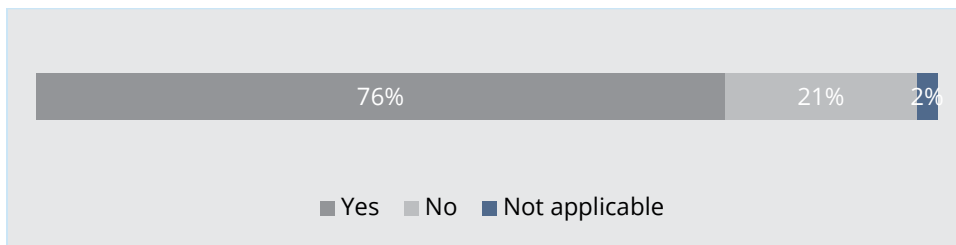
Figure A4.20

Answer Choices	Responses
25 percent or less	91%
26-50 percent	7%
Greater than 50 percent	1%

Note that 5,573 answered and 831 skipped the question.

Question 7: Since the October 15, 2020, launch of JustGrants, have you experienced any technical issues?

Figure A4.21



Note that 5,573 answered and 831 skipped the question.

Question 8: If "Yes," please check all the technical issues you have experienced for the applicable areas during these time periods.

Figure A4.22

	Around the Launch	6 Months Later	Currently as of March to April 2022	Not Applicable
Registration	49%	18%	8%	41%
Accepting awards	31%	22%	13%	52%
Drawdowns / access to funds	25%	21%	15%	58%
Federal financial reports	31%	28%	17%	49%
Performance reports	32%	34%	26%	42%
Other	20%	23%	23%	60%

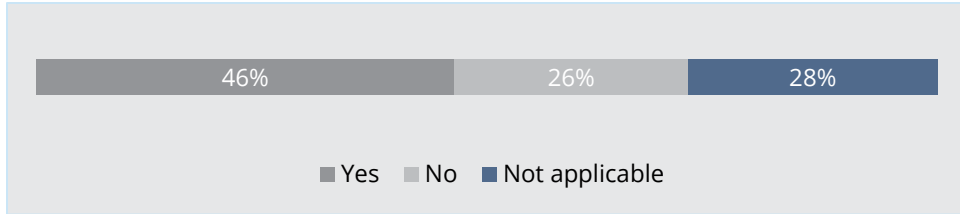
Note that 5,573 answered and 831 skipped the question. Additionally, the total of the responses is over 100 percent as a grantee may have had multiple issues at multiple times.

Question 9: Please select the appropriate percentage that best describes the ability to perform your award management responsibilities using JustGrants during these time periods.¹⁶

¹⁶ External survey respondents identified a technical issue preventing the selection of accurate percentage amounts
Continued

Question 10: Prior to using JustGrants, it was communicated to me that JustGrants would provide core functionality (e.g., a minimal viable product—MVP—using an agile approach), with additional features and functionality released over the next year and beyond.

Figure A4.23



Note that 5,394 answered and 1,010 skipped the question.

Question 11: Please rate your satisfaction with OJP, the COPS Office, and OVW for the following areas.

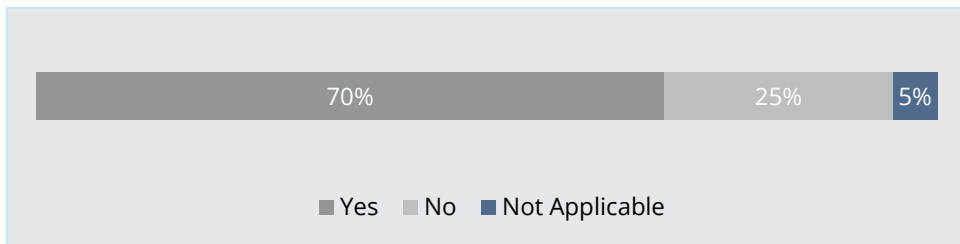
Figure A4.24

	Very Dissatisfied	Dissatisfied	Neither Satisfied nor Dissatisfied	Satisfied	Very Satisfied	N/A
Communication I received about JustGrants technical issues (e.g., emails, FAQ updates, and virtual Q&A sessions).	8%	14%	26%	37%	12%	3%
Assistance I received from the JustGrants helpdesk resolving the technical issues I have experienced with JustGrants.	9%	18%	19%	30%	17%	7%

Note that 5,394 answered and 1,010 skipped the question.

Question 12: Did you receive training for the JustGrants system (e.g., pre-release sneak [peek] sessions, self-paced eLearning videos, reference guides, quick guides, presentation slide decks, reference materials, live office hours, and weekly/monthly briefing sessions)?

Figure A4.25



Note that 5,394 answered and 1,010 skipped the question.

across response areas. For example, a user could not select 25 percent or less for all three time periods: around launch, 6 months later, and currently (as of March to April 2022). Therefore, we excluded this question from our survey results.

Question 13: If "Yes", how satisfied were you with the following?

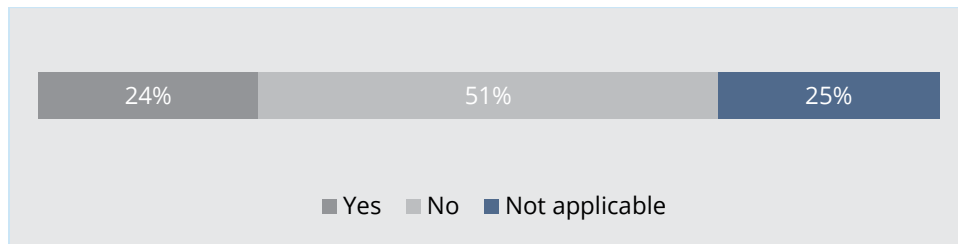
Figure A4.26

Training Activity	Very Dissatisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Very satisfied	Not Applicable
Pre-release sneak [peek] sessions	4%	7%	19%	18%	4%	49%
Self-paced eLearning videos	4%	8%	19%	29%	7%	33%
Reference guides	4%	10%	19%	32%	8%	27%
Quick guides	4%	9%	18%	31%	8%	30%
Presentation slide decks	4%	8%	19%	25%	6%	38%
Live office hours	4%	6%	17%	16%	5%	51%
Weekly/monthly briefing meetings	3%	5%	17%	11%	3%	61%

Note that 5,394 answered and 1,010 skipped the question.

Question 14: I was given the opportunity to provide feedback on the JustGrants system's functionality.

Figure A4.27



Note that 5,367 answered and 1,037 skipped the question.

Question 15: Is there anything else you would like to share about JustGrants?

Note that 2,681 provided narrative comments answered and 3,723 skipped the question.

Questions 10, 14, and 15 provided the option for a narrative response, and over 2,500 respondents submitted meaningful narrative responses between those three questions. Common themes included a dissatisfaction with the navigation, intuitiveness, and user-friendliness of JustGrants; inefficiency; technical glitches; an inadequate helpdesk; and issues with submitting reports and user functionality and permissions, specifically related to the limitations of the Alternate Grant Award Administrator.

APPENDIX 3: The Office of Justice Programs' Response to the Draft Audit Report



U.S. Department of Justice

Office of Justice Programs


Office of the Assistant Attorney General

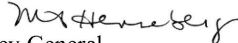
Washington, D.C. 20531

May 24, 2023

MEMORANDUM TO: Michael E. Horowitz
Inspector General
United States Department of Justice

THROUGH: Jason R. Malmstrom
Assistant Inspector General for Audit
Office of the Inspector General
United States Department of Justice

FROM: Amy L. Solomon 
Assistant Attorney General

Maureen A. Henneberg 
Deputy Assistant Attorney General

SUBJECT: Response to the Office of the Inspector General's Draft Audit Report, *Audit of the Office of Justice Programs' Procurement for the JustGrants System*

This memorandum provides a response to the Office of the Inspector General's (OIG) April 28, 2023, draft audit report entitled, *Audit of the Office of Justice Programs' Procurement for the JustGrants System*. The Office of Justice Programs (OJP) appreciates the opportunity to review and comment on the draft report.

In addition to responding to the OIG's recommendations, we would like to provide clarification, context, and additional data relating to some of the draft report's findings. Although the scope of the audit was primarily focused on the procurement for the JustGrants system, the draft report also discusses project planning for JustGrants business requirements, project scope at go-live, contractor resource onboarding timelines, and technical issue resolution from the end user perspective. To provide a more complete description of the transition to JustGrants, below OJP provides additional information and context about the development of and current state of JustGrants, the complex data migration process, the improvements made to JustGrants since launch and upcoming functionality, and the current user experience with JustGrants. In addition, OJP also provides additional context regarding the robust process utilized for the JustGrants procurement.

Transition to JustGrants

The draft report does not adequately describe the complexity and scope of the transition and migration of data. In October 2020, the Department of Justice (DOJ) grant making components –

the Office of Community Oriented Policing Services (COPS Office), the Office of Justice Programs (OJP), and the Office on Violence Against Women (OVW) – transitioned to a single consolidated grants management system at the direction of the Department leadership to eliminate duplication of effort across DOJ’s grantmaking components, improve our ability to manage, track, and monitor DOJ grants, and provide applicants and grantees with an improved user experience across the entire grants lifecycle. JustGrants replaced OJP’s and OVW’s previous 17-year-old Grants Management System (GMS), the COPS Office’s NexGen system and other legacy DOJ IT solutions, integrating them into a unified system, which is a complex, resource intensive effort. JustGrants is currently supporting over 46,000 users managing over 20,000 grants totaling \$24 billion.

In addition to consolidating and transitioning legacy grant systems, with the release of JustGrants, DOJ focused on coming into alignment with other federal government-wide standards in shared services and improving security controls of user access. Since the system was launched, JustGrants successfully interfaces with the following: 1) Department of the Treasury’s Automated Standard Application for Payments (ASAP) for grantee payments, 2) Grants.gov for the common grants application portal, 3) DOJ’s enterprise-wide Unified Financial Management System (UFMS), and 4) OJP’s Digital Identity and Access Management Directory (DIAMD).

The COPS Office, OJP, and OVW transitioned from the Grants Payment Request System (GPRS) to ASAP for the disbursement of funds. JustGrants’ direct integration with ASAP ensures alignment between permissible funding balances and funds available for drawdown. In addition, all DOJ components transitioned to a new integrated financial and acquisition management system, UFMS. JustGrants’ integration with UFMS ensures real-time funds control. Rather than relying on manual, disparate systems of vendor validation, JustGrants’ integration with UFMS also ensures the General Services Administration SAM.gov is the source of entity information. In terms of improved security controls, the transition to DIAMD for user access and management established multi-factor authentication for users, a standard IT security practice that legacy systems did not meet.

Transitions to new systems of this size and scope that require a data migration effort from multiple legacy systems are complex. During the transition to JustGrants, OJP migrated over 18,000 awards, 823,000 attachments, and approximately 65 million data points. The initial plans for JustGrants to have full functionality at launch were changed as the complexity of the system was realized and the need to prioritize first the integration with the financial systems (UFMS and ASAP). The decision to focus on a smaller set of features for the October 2020 go-live was intentional and deliberate.

JustGrants launched with the minimum features developed for basic functionality, which included user and access management roles; integration to ASAP, Grants.gov and UFMS; and operations necessary to move applications through the essential stages of the grant management lifecycle, from solicitation posting, application review, and award making, as well as post-award management of all open and active awards, to include grant modifications and closeout. The OIG’s conclusion that JustGrants went live with only about 30 percent of planned system features completed does not accurately consider that full business features are comprised of multiple parts of functionality. Although some business features had specific parts of functionality that were not fully completed, significant portions of many features were completed.

Over the course of the transition to JustGrants, many users experienced instances in which JustGrants did not perform as expected due to data migration complexities, the system not fully being built out, incomplete entity pre-launch actions, and technical performance issues. Users also faced challenges with learning how to access and navigate entirely new systems, and the various process changes reflected within the systems.

With regard to grantee challenges with accessing their funds, JustGrants system issues were not the primary cause of recipients not being able to access their funds. In most cases, the issue was the result of the award recipient not being properly enrolled in ASAP. To address this challenge, DOJ offered targeted technical outreach to assist award recipients with onboarding, enrollment, and award acceptance.

Development of JustGrants

The draft report does not accurately capture the level of effort, scope, and timing of JustGrants development work. Specifically, the draft report states that “staff did not start the majority of the development work until May 2020 – just 5 months before the non-negotiable launch date.” This is not factual as the development of JustGrants started in April 2019. By May 2020, OJP had completed a significant amount of development work.

Development of the JustGrants system for the go-live release in October 2020 was comprised of six program development increments, which commenced with Program Increment 1 in April 2019. By May 2020, the development work for four program increments – approximately two-thirds of the go-live development – had been completed, including the work to integrate with UFMS, ASAP, and Grants.gov. The development work from May 2020 to the full launch of JustGrants in October 2020, as referenced in the draft report, was comprised of the fifth and sixth program increments. The two final program increments focused on ensuring the integrations between the different modules and processes functioned, inclusive of data migration, external entity management integration, end to end testing, and user demonstrations and remediation. Over the summer of 2020, there were three early releases of JustGrants functionality to production to a subset of internal users. The first release was focused on Solicitations Management and went live in June 2020 and delivered the work which had been completed under the previous contract. The second release was focused on Performance Management and went live in July 2020. The third release was focused on Entity Management and went live in August 2020 and was the first production release with substantial code from the new contract. The major release also known as the go-live release or launch of JustGrants was delivered in October 2020 and provided the basic grants lifecycle functionality, including integrations with UFMS and ASAP and was delivered to all users.

Multiple agile delivery teams, which included platform developers, were established and working under the 2016 contract that was in place prior to the establishment of the 2020 Blanket Purchase Agreement (BPA). For a point in time reference, in January 2020, there were eight staffed development teams, a data migration team, a platform test team, and a DevOps team. These teams worked on the deliverables that were pushed to production over the summer and into the fall of 2020. While the transition to the BPA did not happen until May 2020, significant work (approximately two-thirds of the overall go-live release content) had been accomplished prior to that time. Additionally, new teams were added between January and April of 2020 resulting in 10 fully staffed development teams.

Additionally, it should be noted that the “Platform SME” labor category was new to the 2020 BPA contract. The 2016 contract used other labor categories to recruit platform developers. With the new BPA, developers who met the requirements of the “Platform SME” category were moved from the 2016 contract or were recruited using this labor category.

Current State and Improvements Since Launch

The draft report does not fully describe the current status of JustGrants or the significant improvements that have been made since the system was launched. Currently, JustGrants is operational and functioning for the deployed features. Over the last two years, OJP’s Office of the Chief Information Officer, in partnership with the OJP program and business offices, the COPS Office, and OVW, has worked to improve the operations of the JustGrants program and the quality of the JustGrants system. Over the last two years, significant efforts have been undertaken to identify, triage, and address the most urgent functional gaps and make overall program and system improvements. This enabled a successful FY 2022 award making season, which included improvements in application submission, application review, and the timely awarding of grants.

The following metrics demonstrate the operations and usage of JustGrants since its October 2020 launch. For this period, JustGrants has supported:

- 44,932 external users and 1,220 internal users
- 12,004 unique funding recipients using JustGrants
- 27,506 applications received from Grants.gov
- 12,797 grants awarded totaling \$10.8B
- \$11B in funds drawn down by grantees
- Post-award management of 20,700 active grants, totaling \$24.3B
- 70,546 mandatory performance reports and 129,819 Federal financial reports submitted
- 36,139 grant award modifications completed
- 8,250 grant closeouts performed

In terms of system improvement, the agile approach to JustGrants development is designed to continuously assess and release additional functionality based on prioritized needs identified by business representatives across the COPS Office, OVW, and OJP. Since the launch, additional processes, data fields, and functionality have been released across the entire system for improved efficiency, flexibility, and data collection and management.

Recognizing the need for improved testing, JustGrants project staff also increased the independent testing team and expanded automated testing efforts to improve the quality of the code released. This enhancement to the program is working as we have not released code into production resulting in critical errors.

OJP has published a Key Performance Indicator (KPI) report thirty days after each release to senior leadership to communicate code quality, velocity, and issue resolution progress with the first report published in February 2022. The initial report covered development activities that began in October 2021. The KPIs indicate that JustGrants met and exceeded its development performance targets for all FY 2022 and FY 2023 (to date) program increments.

Numerous advancements have been achieved which have contributed to:

- improved end user satisfaction with the system as shown through reduced call volume to the JustGrants Service Desk,
- higher quality system code as demonstrated by production releases with no critical errors, and
- a more efficient and effective agile methodology as shown through improved release cadence and overall program velocity.

Upcoming Functionality

There is additional functionality needed for monitoring and performance measurement activities that has not yet been implemented. OJP continues to work with its program and business offices, the COPS Office, and OVW to review the requirements for new development and propose IT solutions within the available resources. OJP also continues to actively monitor the operational effectiveness of JustGrants and related integrated systems. This includes gathering and analyzing data on operational controls, metrics, and effectiveness. Identified issues are assessed, prioritized, and resolved with short- and long-term solutions such as workarounds, mitigating controls, data remediation, and code fixes.

User Experience

The draft report does not adequately capture OJP's efforts to improve the JustGrants user experience. Using key performance data and feedback from users, OJP is continuously assessing and enhancing the JustGrants system functionality and usability, the effectiveness of training resources, and responsiveness of system support services.

DOJ obtains internal and external user feedback through a variety of means, such as weekly sessions for external users to receive topic-specific training; direct technical assistance and support on JustGrants system functionality; demonstrations to internal users of new functionality for validation purposes prior to its release into production; analysis of the JustGrants Service Desk assistance requests; training and webinar feedback forms; and direct feedback from grantees to their federal grant manager.

Between FY 2021 and 2022, the JustGrants user base increased by 39% to 48,068 users. Analyzing service desk data for that period, OJP noted a 68% decrease in service desk tickets escalated for code or data fixes and an increase of 12% for first contact resolution. A decline in volume of service desk tickets and an increase in first call resolution rates generally indicate improved understanding and usability of the system, while the reduction in tickets escalated indicates higher code quality and fewer system issues. The vast majority of calls received are for user password resets and walkthrough assistance about an action the user is taking in the system. The largest category of walkthrough assistance is related to entity management. Entity management is the responsibility of applicants and grantees to self-manage their organization's roles and assignments within the system, allowing for full control over assigning and authorizing individuals to submit grant applications, accept grant awards, and carry out post-award actions.

It is and will remain a top priority of OJP to continue to improve and enhance the system over time to provide further benefits to applicants, grant recipients, and Department personnel.

JustGrants Procurement Process

The draft report does not adequately represent the extensive procurement planning and coordination that was undertaken to support the development and implementation of JustGrants. OJP believes it carried out a robust solicitation process for the procurement of JustGrants contract support consistent with the Federal Acquisition Regulation (FAR) procurement policies and procedures in awarding the BPA.

Advanced procurement planning to support the development of JustGrants was a multi-year process that started in November 2017. The support sought from the BPA awarded by OJP was, in part, a continuation of support provided to the agency via a prior contract issued through an assisted acquisition with the National Institutes of Health Information Technology Acquisition and Assessment Center (NIH NITAAC). The NIH NITAAC contract was awarded in September 2016 and expired in September 2020.

In April 2019, OJP began significant development efforts for JustGrants via its contract with NIH NITAAC, 18 months prior to the JustGrants go-live. OJP had a detailed milestone plan that detailed a thoughtful transition of services from the NIH NITAAC contract to the new OJP BPA, and the milestone plan detailed all the major phases of the procurement. Further, OJP's BPA statement of work (SOW) scope was intentionally broad to support much more than OJP's JustGrants effort.

Awarded in February 2020, the OJP BPA awarded to support more than the JustGrants project. It was awarded to support multiple projects and to obtain enterprise-wide application development and enterprise architecture support services for OJP. The BPA was awarded in February 2020 to ensure that OJP had a contract vehicle in place with sufficient transition time (i.e., 8 months) to support the JustGrants project in the event a non-incumbent contractor was determined to be the best value awardee and transition of the work necessary. This planned lead time was appropriate and sufficient to avoid any adverse impacts to quality, costs, and schedule, even with a potential change in contractor supporting OJP requirements.

From the beginning of its advanced procurement planning, OJP embarked on its robust solicitation process by first engaging directly with the appropriate vendor community by hosting an "industry day," and then requesting feedback from vendors through a Request for Information that was publicly posted on FedBizOps. During this time, OJP was able to directly engage with vendors, provide greater detail on the scope of the BPA, and listen to industry's input on the RFQ's requirements. The final BPA SOW was directly influenced by feedback from industry. Moreover, after the RFQ was publicly posted, OJP provided vendors with an opportunity to ask questions on the SOW and RFQ so that vendors could submit an appropriate response. OJP thoroughly answered the questions received and publicly provided answers to all interested vendors.

The procurement was conducted in accordance with the FAR Subpart 8.4 - Federal Supply Schedules. Prior to posting the RFQ, the entire solicitation package, including the SOW, went through OJP's rigorous RFQ review process that involves input from five organizational layers, including feedback from the customer (OJP's Chief Information Officer and members of his team), the Department's Information Technology Acquisition Review Board, the OJP Contracts Specialist

and Contracting Officer, OJP acquisition policy officer, OJP head of procurement, and OJP Office of the General Counsel.

Given the magnitude and importance of the BPA, OJP further enhanced its normal solicitation process by coordinating with the Department's senior procurement officials. The entire solicitation was reviewed directly by DOJ's Chief Information Officer, DOJ's Director of the Office of Small and Disadvantaged Business Utilization, the Small Business Administration's Procurement Center Representative assigned to DOJ, the Justice Management Division's Bureau Procurement Chief, and DOJ's Senior Procurement Executive.

Detailed in the RFQ was the agency's best estimate of the labor categories (along with education and experience qualifications) that may be utilized over the duration of the BPA. The RFQ instructed quoters to propose their equivalent GSA Schedule labor categories and corresponding rates. All quoters bid to the same notional level-of-effort provided in the RFQ. Quoters were not provided a specific order-level SOW, nor were they asked to provide pricing for such. The RFQ was clear that the notional labor categories were included into the solicitation phase for evaluation purposes only. OJP conducted the RFQ competition in this manner because it realized that all eventualities could not be captured for its many order-level requirements anticipated under the BPA. As such, the BPA-level SOW allowed for variances in labor categories, and by implication, costs.

Costs did not "increase" as stated in the OIG draft report. Rather, after awarding the BPA OJP provided specific order-level SOWs for which the awardee proposed specific labor categories and rates. Per the terms of the RFQ – and thereby, the resulting award – the awardee was permitted to use any labor category on its GSA Schedule to meet agency requirements when responding to order-level SOWs. This was intentional, given the fact that GSA Schedule contractors have far more labor categories on their GSA Schedule to support the broad scope of the BPA than what the agency provided in the RFQ. However, to the extent that the awardee proposed the same labor category included in their BPA-level response, that specific labor category and corresponding labor rate could not be higher than any discounted rate proposed at the BPA-level. Otherwise, the awardee's pricing per labor category/hour could not be higher than that authorized by the underlying GSA schedule contract. In accordance with FAR 8.404, GSA has already determined the labor rates under schedule contracts to be fair and reasonable.

The record shows that all vendors submitting a proposal bid to the same RFQ constraint in terms of the pricing submitted, so the other respondents would almost surely have had to adjust their labor categories provided and their price quoted to support the respective order-level SOWs that had additional labor qualifications. Given that the awardee demonstrated superior quality in all of the RFQ evaluation factors, OJP determined them to represent the best value in this procurement, and appropriately documented that decision in the contract file.

During the source selection process, OJP intentionally did not reveal how it would conduct exchanges with quoters, because the agency was not required to do so. The only requirement for exchanges in the FAR 8.4 environment is that they be fair and equitable, and OJP complied with this requirement. Under FAR 8.4, the agency is afforded a range of procedural options that may be used to process source selections (options set forth in case law); however, it was impossible to know the exact course of action OJP would take until the submissions were evaluated. Given the

circumstances and acquisition authority utilized, the OJP acted in a transparent and fair manner in making its best value award decision.

The FAR provides sufficient procurement policies and procedures that were followed by members of OJP's acquisition team in awarding the BPA. In accordance with FAR 1.102-4, absence of direction or policy is interpreted as permitting the acquisition team to innovate and use sound business judgment that is otherwise consistent with the law and within the limits of their authority. OJP contracting officers routinely take the lead, as demonstrated in this procurement, in encouraging business process innovations and ensuring that business decisions are sound.

The draft audit report contains four recommendations. For ease of review, the recommendations directed to OJP are summarized below and are followed by OJP's response.

We recommend that OJP:

1. Enhance its solicitation process to ensure agency requirements are clear and accurate so that vendors can respond appropriately to those solicitations.

The Office of Justice Programs concurs with this recommendation. OJP's Office of Administration (OA), Acquisition Management Division (AMD) is committed to encouraging business process innovations and ensuring that business decisions are sound. OA/AMD will review its existing procedures and, as necessary, develop procedures to enhance its solicitation process to more fully implement techniques such as: 1) coordinating with customers to consider incorporating specific order-level SOWs in the RFQ process, as appropriate, when larger contract vehicles (i.e., BPA or indefinite delivery/indefinite quantity (IDIQ)) are contemplated; 2) implementing additional price evaluation techniques, such as price realism analysis, into RFQ evaluation criteria, as appropriate; and 3) facilitating requirements development trainings with OJP offices, such as service acquisition workshops, to ensure agency requirements are clear and accurate.

Although we concur with the recommendation in pursuit of continuous improvement, as described in the section above, OJP believes it carried out a robust solicitation process for the procurement of JustGrants contract support and followed the FAR procurement policies and procedures in awarding the BPA.

We consider this recommendation resolved and request written acceptance of this action from your office.

2. Incorporate specific agile metrics into the BPA task orders, QASP, and MSRs to effectively measure performance.

The Office of Justice Programs concurs with this recommendation. At this time, only one task order under the BPA is an agile project. The contracting officer will coordinate with OCIO to define specific agile metrics, and then modify those metrics into this task order, as appropriate. Additionally, the contracting officer will continue to hold monthly accountability meetings with the contractor, established in May 2021, to ensure quality performance by discussing the following: 1) monthly performance assessment data and financial trend analysis; 2) staffing

issues or concerns of both parties; 3) recommendations for improved efficiency and/or effectiveness; and 4) projected outlook for upcoming months and progress against expected trends, including any corrective action plan analysis.

We consider this recommendation resolved and request written acceptance of this action from your office.

3. Ensure the COR's BPA duties are fully executed as required and that documentation is maintained to support those efforts.

The Office of Justice Programs concurs with this recommendation. The Contracting Officer (CO) has met directly with the Contracting Officer's Representative (COR) to review responsibilities detailed in the COR delegation letter. Further, CO will establish regular reviews with the COR to support contract compliance. FAR 1.604 specifies the minimum documentation that must be included in the COR file. OJP's acquisition office will also train all OJP CORs on maintaining a file for each contract under their administration and ensure that CORs have readily available access to all pertinent documents.

We consider this recommendation resolved and request written acceptance of this action from your office.

4. Enhance internal policies and procedures to help ensure compliance with the Prompt Payment Act.

The Office of Justice Programs concurs with this recommendation. OJP's Office of the Chief Financial Officer will review its existing policies and procedures related to the Prompt Payment Act and seek opportunities to clarify and/or enhance procedures that ensure compliance with the Act.

We consider this recommendation resolved and request written acceptance of this action from your office.

Thank you for the opportunity to respond to this draft report. If you have any questions regarding this response, please contact Ralph E. Martin, Director, Office of Audit, Assessment, and Management, at (202) 305-1802.

cc: Ralph E. Martin
Director
Office of Audit, Assessment, and Management

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APPENDIX 4: General Dynamics Information Technology's Response to the Draft Audit Report



Month 19, 2023

GDIT appreciates the opportunity to respond to the DOJ Office of the Inspector General audit report of the Office of Justice Programs' Procurement for the JustGrants System.

GDIT is proud of its role assisting the federal government with its most challenging requirements and takes seriously its responsibilities under its contracts. As the audit report observes, the JustGrants project was a complex and far-reaching effort that involved the migration of multiple outdated and obsolete legacy systems. GDIT worked at the direction of the government and other DOJ contractors to execute specific development tasks that were assigned to it. Despite these challenges, GDIT provided valuable and skilled resources to assist OJP in this system migration.

GDIT appreciates and agrees with OIG's recommendations that future programs involving such complicated migrations should involve earlier planning, improved coordination regarding selection of the underlying IT platform, and clear and accurate requirements. System migrations of this kind are complicated undertakings and will benefit from improved and earlier direction to contractors.

Although there are no recommendations in the audit report directed at GDIT, GDIT appreciates the opportunity to make the following observations:

- 1. GDIT worked as part of an integrated project team through orders for specific scope of development work.**

As noted in the report, the IT platform on which JustGrants was to be built was chosen by the government. As also noted in the report, the government selected other contractors to assist with JustGrants-related work, and in particular to set overall project goals and directions. GDIT's role was to act at the direction of DOJ and the other DOJ contractors.

- 2. GDIT complied with government direction under its contract, and none of the issues discussed in the report created security risk.**

GDIT

The report states at page 18 that “GDIT did not verify employment applicant responses on the SF-85P, which includes if applicants were debarred from government employment.” It further suggests at page 16 that this created “a risk that a security concern was not identified.” These statements risk misleading readers of the report, because the government acknowledges that GDIT was not able to access applicant responses on the SF-85P, and moreover because whether or not a contractor reviews such responses has no bearing on the government identifying security concerns.

As noted in the report, the SF-85P is a government questionnaire that is used by the government to evaluate prospective applicants for public trust positions (which, as the SF-85P states, are not national security sensitive positions). Applicants complete and submit the SF-85P online completely outside of contractors’ control. At all times during the contract, the government was responsible for and did conduct background checks and suitability determinations in response to SF-85P submissions by prospective applicants. Although adding an initial screening of such applications prior to the government background check stage might in theory save resources by eliminating the need to conduct a check on ineligible applicants, the decision not to conduct an initial screening does not create any security risk, because the background check itself would identify any ineligible applicants.

In any event, as the report acknowledges, the United States government decided to set access permissions so that GDIT could not access candidates’ SF-85P applications. As a result, GDIT was not able to “verify employment applicant responses on the SF-85P, which includes if applicants were debarred from government employment.” We understand that the government made this decision for its own purposes, and was aware of the effect of this decision on contractor access. This decision constructively changed the contract requirements related to contractor pre-screening of responses to the SF-85P questionnaire. GDIT agrees that this constructive change should have been memorialized by the government through a written amendment of the contract.

As noted above, however, GDIT is not aware of any evidence that the government’s decision created any “risk that a security concern was not identified,” because the government ultimately conducted background investigations and suitability determinations for SF-85P submissions regardless of contractor pre-screening activity.

Finally, although the OIG report also cites potential inefficiencies stemming from the government’s elimination of GDIT’s ability to pre-screen applications, GDIT is unaware of any increased cost to the government resulting from this decision.

GDIT

GDIT cares about effective partnership with the government, which is especially important for this type of complex legacy system migration. GDIT appreciates the report's observations that will allow for improved partnership between government agencies and contractors in these challenging and important projects.

Sincerely,

A handwritten signature in black ink that reads "Paul Nedzbala". The signature is written in a cursive style with a large initial "P".

Paul Nedzbala

Senior Vice President

APPENDIX 5: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The OIG provided a draft of this audit report to the Office of Justice Programs (OJP) and General Dynamics Information Technology (GDIT). OJP's response is incorporated in Appendix 3, and GDIT's response is incorporated in Appendix 4 of this final report. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Analysis of OJP's and GDIT's Responses

In its response to our draft report, OJP concurred with our recommendations. In addition, OJP provided comments that were not related directly to our recommendations. As we discuss in more detail below, we respectfully disagree with specific statements in OJP's response. Before discussing OJP's responses to each of our recommendations, we provide the following reply to statements not related to specific recommendations.

OJP's response discusses specific areas of its transition to JustGrants for which it believes the OIG report does not provide sufficient detail or context for the various challenges the agency faced in this important project. As we note in our report, the transition to JustGrants was a significant undertaking for DOJ. Our report also details that despite years of planning, the system that went live in October 2020 had a significant negative impact on users, and OJP was forced to provide multiple extensions to financial, programmatic, and other reporting that compromised DOJ's ability to provide effective oversight of the billions of dollars in awards it makes each year. OJP realized these issues, and in August 2021 engaged a private consultant to review the JustGrants transition and "to assess program deficiencies and recommend remedies." As noted in our report, the consultant found that at the time JustGrants was launched, fundamental features were missing, production features did not work, and the system was "more-or-less unusable." Ultimately, while the OIG acknowledges the scope of the project and the immense responsibility the transition was for OJP, the Office of Community Oriented Policing Services, and the Office on Violence Against Women staff, we believe our report fairly characterizes the planning and implementation of JustGrants, including its effect on both internal and external users.

One specific area that OJP's response identifies as necessitating more detail is the complexity and scope of the transition and migration of data. OJP stated that in addition to consolidating and transitioning legacy grant systems, DOJ focused on coming into alignment with other federal government-wide standards in shared services and improving security controls of user access. OJP also stated that its initial plans for JustGrants to have full functionality at launch changed as the complexity of the system was realized, and that the focus on "minimum features developed for basic functionality" for the October 2020 launch date was intentional and deliberate. OJP's response also asserts that the OIG's conclusion that JustGrants went live with only about 30 percent of planned system features completed does not accurately consider that full business features are comprised of multiple parts of functionality, and that while some features were not fully completed, significant portions of many features were completed. However, the OIG did not conclude that the launch of JustGrants was challenged solely due to the percentage of system features that were included at launch. Rather, and as noted throughout this report, our conclusions were informed by issues including, but not limited to: (1) the need to provide grantees multiple reporting extensions that complicated award monitoring and oversight; (2) the significant issues identified by the consultant hired by

OJP, and OJP's continued work to address those recommendations, and; (3) the views of both internal and external JustGrants users.

OJP's response also states that the OIG report does not accurately capture the level of effort, scope, and timing of JustGrants development work. Although our report clearly indicates that our work focused on the February 2020 blanket purchase agreement (BPA) with GDIT, it includes information about the development efforts to build JustGrants under an April 2019 National Institutes of Health (NIH) contract and detailed OJP's preliminary planning efforts, including the September 2018 procurement of the IT platform and the April 2019 migration of data from the legacy system to the new IT platform. However, as noted by OJP officials, one of the main causes of the system issues during the launch was the lack of contractor staff that adversely affected the rate at which system features were completed. The consultant hired by OJP also identified this as a concern and made a recommendation to OJP to add more staff to accelerate the development. Moreover, in its response to the draft audit report, GDIT agreed with the OIG's recommendations and stated that future programs involving such complicated migrations should involve earlier planning and improved coordination regarding the selection of the underlying IT platform, and clear and accurate requirements.

OJP stated that the draft report does not adequately capture OJP's efforts to improve the JustGrants user experience or fully describe the current status of JustGrants and the significant improvements that have been made since the system was launched. We do not believe this is accurate, as the report acknowledges OJP's success in making all FY 2022 awards on schedule, includes OJP's assertion that JustGrants is operating as needed and supports award-making functions, and describes OJP's implementation of multiple efforts such as onboarding outreach, training, and targeted technical assistance. Moreover, not only are additional achievements highlighted in the infographic on page 13 of this audit report, the report also notes that OJP implemented 73 of the 91 consultant recommendations and has seen enhancements to the development of JustGrants, which includes staffing, the sprint process, planning, and testing.

Finally, OJP's response states that the OIG report does not adequately represent the extensive procurement planning and coordination that was undertaken to support the development and implementation of JustGrants. The OIG acknowledges OJP's procurement planning included multiple stages, including hosting an industry day with vendors and receiving input from key DOJ personnel. However, despite OJP's efforts, the OIG identified areas within the procurement process that could be strengthened and improved. Moreover, in its response to our first recommendation, OJP states that it will pursue continuous improvement to enhance elements of its procurement process.

While none of our recommendations were directed at GDIT, in its response to our draft report, GDIT discusses the OIG's finding related to OJP's failure to ensure the contractor reviewed certain security documents, including if applicants were debarred from government employment. GDIT's response asserts that it complied with government direction under its contract, and none of the issues discussed in the report created a security risk. The OIG does not dispute whether GDIT complied with government direction and our report acknowledges that GDIT did not have access to the necessary applicant security documents to perform this task. However, pre-screening applicant responses from the security documents was a BPA requirement and failure to perform this pre-screening creates a risk—albeit one that was not realized—that debarred employees may have been hired.

Recommendations for OJP:

- 1. Enhance its solicitation process to ensure agency requirements are clear and accurate so that vendors can respond appropriately to those solicitations.**

Resolved. OJP concurred with our recommendation. OJP stated in its response that it will pursue continuous improvement and believes it carried out a robust solicitation process for the procurement for JustGrants contract support and followed the FAR procurement policies and procedures in awarding the BPA. Additionally, OJP will review its existing procedures and, as necessary, develop procedures to enhance the solicitation process to more fully implement techniques such as: (1) coordinating with customers to consider incorporating specific order-level Statements of Work in the Request for Quotation (RFQ) process, as appropriate, when larger contract vehicles (i.e., BPA or indefinite delivery/indefinite quantity [IDIQ]) are contemplated; (2) implementing additional price evaluation techniques, such as price realism analysis, into RFQ evaluation criteria, as appropriate; and (3) facilitating requirements development trainings with OJP offices, such as service acquisition workshops, to ensure agency requirements are clear and accurate.

This recommendation can be closed when we receive evidence that OJP has enhanced its solicitation process to ensure agency requirements are clear and accurate so that vendors can respond appropriately to those solicitations.

- 2. Incorporate specific agile metrics into the BPA task orders, quality assurance surveillance plan (QASP), and monthly status reports (MSR) to effectively measure performance.**

Resolved. OJP concurred with our recommendation. OJP stated in its response only one task order under the BPA is an agile project. The Contracting Officer (CO) will coordinate with the Office of the Chief Information Officer to define specific agile metrics and then modify those metrics into this task order, as appropriate.

This recommendation can be closed when we receive evidence that OJP has incorporated specific agile metrics into the BPA task orders, QASP, and MSRs to effectively measure performance.

- 3. Ensure the Contracting Officer's Representative's (COR) BPA duties are fully executed as required and that documentation is maintained to support those efforts.**

Resolved. OJP concurred with our recommendation. OJP stated in its response that the CO will establish regular reviews with the COR to support contract compliance and train all OJP CORs on maintaining a file for each contract under their administration.

This recommendation can be closed when we receive evidence that OJP has ensured the COR's BPA duties are fully executed as required and that documentation is maintained to support those efforts.

4. Enhance internal policies and procedures to help ensure compliance with the Prompt Payment Act.

Resolved. OJP concurred with our recommendation. OJP stated in its response will seek opportunities to clarify and/or enhance procedures that ensure compliance with the Prompt Payment Act.

This recommendation can be closed when we receive evidence that OJP has enhanced and implemented its procedures to comply with the Prompt Payment Act.