



Audit of Office of Justice Programs'
Administration of the Comprehensive
School Safety Initiative



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EXECUTIVE SUMMARY

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Objective

The objective of this audit was to evaluate the Office of Justice Programs (OJP), National Institute of Justice's (NIJ) administration and oversight of its Comprehensive School Safety Initiative (CSSI) award program.

Results in Brief

NIJ has awarded \$246 million in CSSI funds to research the root causes of school violence and evaluate strategies to improve the safety of K-12 public schools. The audit sampled CSSI award research goals and performance measures and determined them to be consistent with the overall objectives of CSSI.

As of September 2022, CSSI had funded the completion of nearly 240 research products that serve as a valuable repository of school safety findings and practices. While NIJ has shared some CSSI research results online and at virtual and in-person events, not all CSSI research results are available, linked, or easily accessible to school safety stakeholders.

Our audit did not identify significant issues related to NIJ's management of the CSSI peer review panel's award application assessment. However, we found NIJ can improve its oversight of CSSI by better documenting the adequate resolution of conflict-of-interest matters and enhancing the coordination between grant managers and social science research analysts with regard to site visits and progress report review.

Recommendations

Our report contains three recommendations for OJP to improve NIJ's administration and oversight of the CSSI award program. We requested a response to our draft audit report from OJP and their response is appended at Appendix 3. OJP agreed with all recommendations. Our analysis of OJP's response can be found at Appendix 4.

Audit Results

Under CSSI, NIJ has provided \$246 million to fund more than 100 awards to research and produce school safety knowledge encompassing over 4,000 schools across 36 states. Even though dedicated appropriation for CSSI ended after FY 2017, additional action is necessary to facilitate access to and awareness of CSSI research efforts and further strengthen NIJ grant management oversight.

Not all CSSI Research Contents were Identified, Readily Accessible, or Publicly Available

We found that NIJ's publication listing webpage did not upload, link, and post all CSSI research reports. In addition, some CSSI-derived research reports required payment for access. These limitations potentially created unawareness and impacted the accessibility and thus value of some CSSI research efforts and knowledge.

NIJ Needs to Strengthen Conflict-of-Interest Resolution Files and Enhance Award Oversight Coordination

While NIJ documented various conflicts of interest that arose from its program personnel, NIJ did not always document the rationale and decisions made in addressing these matters. This lack of context and documentation increases the likelihood of inconsistent handling of disclosures and noncompliance with OJP's conflict-of-interest policies.

NIJ's social science research analysts conducted site visits without coordinating these visits with the NIJ grant manager. These social science research analysts also did not document their conclusions when evaluating CSSI awardees' progress reports. Such input is necessary to provide NIJ and other stakeholders an accurate and complete determination of how well a research project has progressed or if it required additional oversight, monitoring, or review.

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Introduction

In response to the December 14, 2012, school shooting in Sandy Hook Elementary School and other high-profile school violence incidents, Congress in 2014 established through appropriation the Comprehensive School Safety Initiative (CSSI) within the Office of Justice Programs (OJP), National Institute of Justice (NIJ) to research the root causes of school violence, develop strategies to increase school safety, and evaluate innovative school safety strategies through pilot programs and best practices.¹

As of September 2022, NIJ has made over 100 CSSI awards valued at over \$246 million. To yield results adaptable to the needs and challenges of various school environments, CSSI awards supported studies at the city, county, state, and national levels that evaluated, analyzed, and assessed evidence-based approaches involving K-12 public schools (including public charter schools) partnered with researchers, educators, and other stakeholders. These research projects address at least one of CSSI's three framework elements: physical safety, school climate, and student behavior. CSSI award recipients have collectively compiled 239 research products on different facets of school violence and school discipline, including the causes and consequences of school-based violent offending and victimization, and prevention strategies. In total, NIJ reports that CSSI's research encompassed over 4,000 schools across 36 states.

While the Consolidated Appropriations Act of 2018 ceased providing new funds to CSSI, NIJ has used reprogrammed CSSI funds to evaluate the effectiveness of school violence prevention approaches funded by other federal award initiatives. Specifically, in 2020, NIJ reported CSSI-derived metrics to help officials assess the effectiveness of awards made under the Students, Teachers, and Officers Preventing (STOP) School Violence Program.² In addition, due to COVID-19 school disruptions, NIJ extended the performance period of several CSSI awards. Thus, as of September 2022, there are 20 CSSI awards valued at \$63 million that remain open.

Previous Audit Work

The OIG has issued seven audit reports from FY 2013 to FY 2019 related to CSSI, six of which concerned individual CSSI grants and one, which was issued in 2019, that concerned NIJ's overall grant management practices.³ Collectively, the CSSI grant audits identified unallowable expenditures and inaccurate financial reporting but found adequate progress towards stated goals and compliance with award agreements. NIJ

¹ NIJ seeks to research, develop, and evaluate evidence and tools to inform criminal justice decision-making and reduce crime. For the purposes of the CSSI program, "school safety" encompasses incidents that may occur on school property during or outside of school hours, on the way to and from school or school-sponsored events, on school-sponsored modes of transport, or during school-sponsored events.

² Unlike CSSI, which is research focused, the STOP School Violence Program supports school training and physical improvements, such as metal detectors and response technologies to improve school security. The program began around the time that CSSI funding ceased and is jointly administered by OJP's Bureau of Justice Assistance (BJA) and the Office of Community Oriented Policing Services (COPS Office). CSSI's FY 2020 Research and Evaluation on School Safety award solicitation sought to support the STOP School Violence Act Program by evaluating the effectiveness of various school threat assessment approaches; examining the factors that may predict who becomes a school shooter; studying bias-based harassment; and assessing the accomplishments of State School Safety Centers. NIJ stated that it plans to report in 2023 on the status of its assessment findings from FY 2020 research effort.

³ See Appendix 2 for a list of completed OIG audits related to the CSSI award program.

subsequently cancelled two CSSI awards as a result of OIG grant audit findings.

Meanwhile, the 2019 audit of NIJ's grant management practices found concerns with post-award activities, employee roles and responsibilities, conflicts of interest, and compliance with Paperwork Reduction Act requirements.

OIG Audit Approach

The objective of this audit was to evaluate NIJ's administration and oversight of its CSSI award program. To accomplish this objective, we assessed NIJ's management of CSSI's goals and objectives to research the root causes of school violence and promulgate strategies to increase school safety. Our audit thus considered how NIJ disseminated CSSI research results and stewarded the selection and monitoring of CSSI awards. For award selection, we reviewed NIJ's solicitation, peer review, and award selection procedures. For monitoring, we assessed whether NIJ set required performance measures for awardees that aligned with CSSI goals and evaluated NIJ's progress report and awardee database metadata handling procedures. The scope of this audit covered OJP and NIJ policies, procedures, and actions since FY 2014, when Congress first appropriated CSSI, through September 2022.

Audit Results

Ensuring our nation's schools are safe and free from violence is a pressing national concern. As NIJ is concluding the CSSI research program, it has an important opportunity to enhance the accessibility of CSSI research results so that teachers, administrators, security professionals and others charged with making schools safe have access to them. While NIJ has shared some important CSSI research findings to the public, we found that the structure of how research contents have been posted across various public and private websites has resulted in limiting CSSI information access and sharing. Moreover, not all CSSI research products are freely available or accessible. Therefore, we believe NIJ needs to assess ways to ensure future research results supported with taxpayer funds are readily accessible to the public.

Regarding CSSI award selection procedures, we found that NIJ needs to better document its conflict-of-interest disclosure decisions. For CSSI award recipient monitoring, NIJ needs to implement policies to better coalesce and deconflict the roles and responsibilities of its grant managers and social science research analysts, particularly for documenting on-site visits and evaluating progress reports.

Promulgation of CSSI Research Results

The primary goal of CSSI was to fund research that produces practical knowledge in order to improve the safety of schools. Generally, each CSSI awardee was to establish an agreement between a highly qualified researcher and a participating school to fulfill the research requirement of the grant. As a deliverable, NIJ required CSSI awardees to produce a final report detailing research results by the end of the award period. Table 1 outlines the overall CSSI goals and objectives as they relate to NIJ's effort to identify best strategies to improve school safety.

Table 1

CSSI Goals and Objectives

	1. Identify and understand the potential root causes and consequences of school violence and its impact on school safety.
	2. Increase the safety of schools nationwide by developing a solid foundation of knowledge and best practices that can be implemented through individualized school safety programs, policies, and activities.
	3. Help identify matters internal and external to the school that may result in harm to students, teachers, staff, and schools.
	4. Implement programs, policies, and practices that improve school safety and climate, focus on the school environment, or enhance educational and other outcomes for students and schools.
	5. Identify effective strategies to respond to and resolve safety issues faced by schools and students.
	6. In collaboration with key partners from the education, law enforcement, behavioral and mental health, and social work fields, develop and test a comprehensive framework for school safety.

Source: NIJ

As of September 2022, CSSI award recipients have produced 239 research reports and articles on different facets of school violence and school discipline, including the causes and consequences of school-based violent offending and victimization, and prevention strategies. These reports summarized ways in which school violence can be measured and conceptualized, such as documented threats, recorded disciplinary incidents, and reported aggression, bullying, and sexual harassment.⁴

Types of CSSI Research Results and Award Outcomes

School safety and security are more than just violence prevention and incident response. They can also include issues related to school climate, childhood trauma, bullying, and harassment. Thus, many types of crises and incidents that disrupt the school learning environment can be viewed as school safety issues.

To obtain an overview of CSSI research results and award outcomes, we judgmentally selected a total of 12 CSSI awardees to capture the variety of stakeholder levels involved in (e.g., state educational entities, local school districts, universities, and non-profit and for-profit organizations) and type of research topic funded by the program. Of these 12 sampled awardees, we further discussed with 6 recipients how each used CSSI funds to research a range of school safety topics, including: (1) student social media screening; (2) mental

⁴ The National Criminal Justice Reference Service (NCJRS), an OJP online library database, serves as the archival record of the final report along with other related peer-reviewed research articles resulting from CSSI awards.

health screening; (3) truancy prevention; (4) school resource officer training; (5) school emergency operation planning; and (6) classroom behavior reinforcements.

We compared the goals described in their project narrative to the research goals in the corresponding solicitation and matched them to the overall CSSI framework goals for all 12 CSSI award recipients.⁵ Table 2 further summarizes the sampled reported performance measures and outcomes for the six interviewed award recipients.

⁵ While the initial grant solicitation did not specify categories of study, the subsequent solicitations refined research categories to developing knowledge from efficacy and effectiveness studies, understanding the causes and consequences of school violence, shorter term studies on school safety, and developing and evaluating of comprehensive school safety approaches.

Table 2

Research Results and Outcomes of Sampled CSSI Award Recipients

Type of Awardee	Research Objectives	Research Results	Award Outcomes
City Public School System	 Evaluation of a social media detection and monitoring program to identify at-risk behavior.	<ul style="list-style-type: none"> Lowered the risk of students becoming shooting victims. Schools experienced fewer misconduct incidents. 	<ul style="list-style-type: none"> Continuation of program and changes in school protocols.
Public State-wide University	 Examination of the universal mental health screening (UMHS)'s effectiveness.	<ul style="list-style-type: none"> UMHS was effective in determining students' mental health needs for appropriate intervention. 	<ul style="list-style-type: none"> Continuation and implementation of the UMHS research model.
Non-Profit Education Research Firm	 Evaluation of the effectiveness of the enhanced version of Keeping Kids in School Initiative model.	<ul style="list-style-type: none"> Research results were not statistically significant. COVID-19 school closures disrupted the data collection effort. 	<ul style="list-style-type: none"> Assessment affected by COVID-19. Researcher continues school safety research.
State Department of Education	 Evaluation of the effectiveness of school resource officers (SRO) integration in reducing disciplinary incidents.	<ul style="list-style-type: none"> Well-trained SRO with a multidisciplinary mental health team was significant in reducing the number of disciplinary incidents. 	<ul style="list-style-type: none"> Delayed by data integrity issues. Awardee did not apply CSSI knowledge to other school safety research.
Non-Profit Research Institute	 Evaluation of schools' emergency operations plan (EOP) to determine its preparedness and vulnerabilities.	<ul style="list-style-type: none"> Few EOPs fully satisfied federal recommendations for basic security practices. EOPs also varied significantly in quality, format, and detail. 	<ul style="list-style-type: none"> Awardee received BJA award to continue school threat assessment research.
Non-Profit Think Tank	 Evaluation of a program that positively reinforces classroom behavior.	<ul style="list-style-type: none"> Research results were currently not available. 	<ul style="list-style-type: none"> The award received a no-cost extension and was currently open at the time of the audit fieldwork (May 2022).

Source: Award recipients and OIG analysis of award documentation, project narrative, final report(s), and research articles resulted from CSSI awards.

We discussed with the awardees their respective research results and support for award outcomes. For example, an award recipient official told us that CSSI research results led to significant changes within school safety protocols and policies. We also obtained evidence to confirm these changes. Other award recipients reported responsive NIJ grant manager communication, consistent support, and valuable collaboration – particularly regarding adjusting grant performance periods and reporting requirements due to COVID-19 disruptions.

Some of the sampled CSSI projects encountered various issues that affected research results. For example, an awardee's own Institutional Review Board (IRB) reported two issues related to the handling of participant consent forms. Specifically, the IRB identified that the number of participants' responses exceeded the

number of consent forms, and that the data was collected online rather than in-person with approved study personnel.

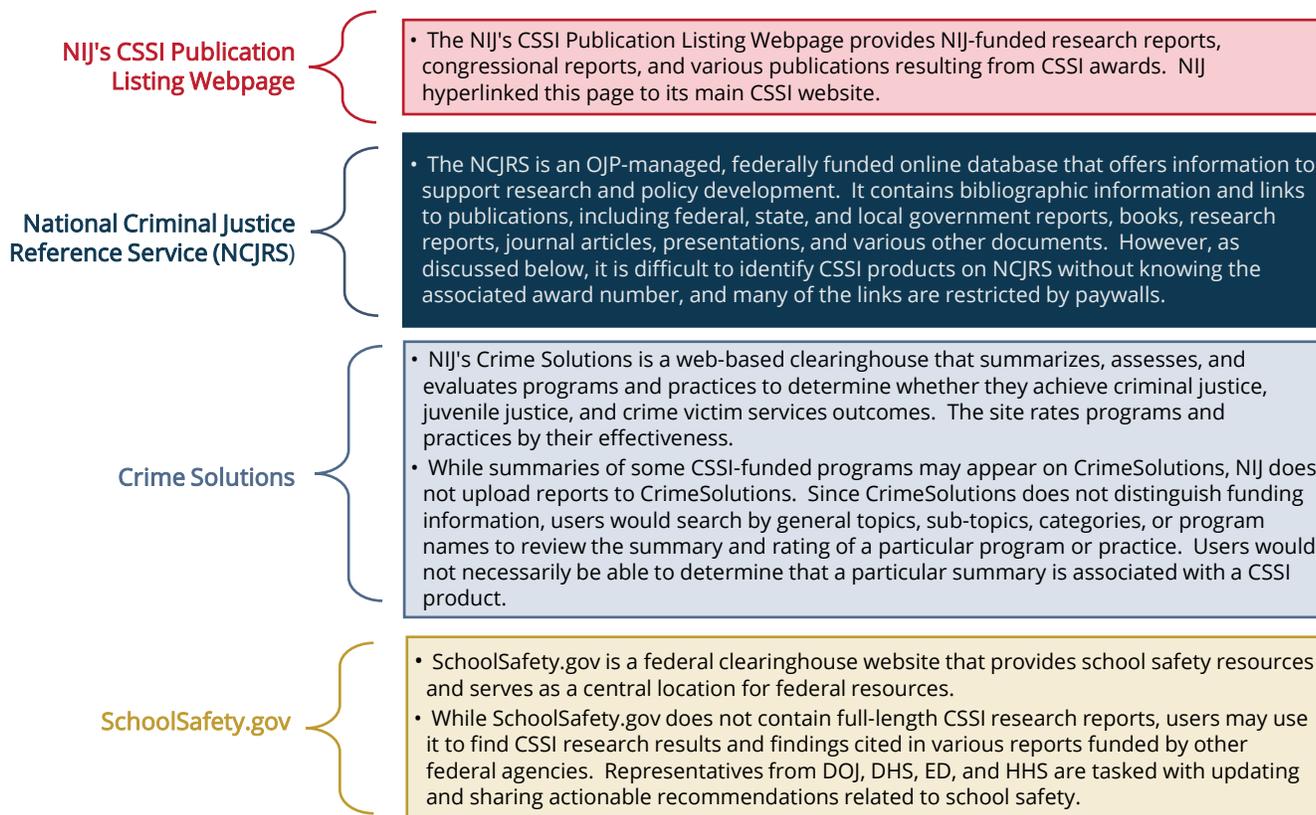
In this case, the NIJ grant manager instructed the recipient to cease its interaction with human subjects until the recipient's IRB and NIJ's Human Subjects Protection Officer could separately determine and approve next steps. NIJ also froze award funds until the matter was resolved. The recipient subsequently recollected data and revised its proposals to recommit participating schools. These efforts led to various delays, a timeline extension, a budget modification to adjusted cost category allocations, and award document resubmission. Our review of email correspondences and documentation indicated that NIJ provided proper guidance and communication to alleviate the awardee's consent forms issue.

Access to CSSI Research Results

Once an awardee submitted its drafted research report, the report underwent an NIJ internal review that in some cases resulted in a discussion with the awardee and requests to address further questions, comments, and clarifications. Once approved, NIJ disseminated CSSI research contents to various online portals, as listed in Figure 1 below.

Figure 1

NIJ Dissemination of CSSI Research Contents



Source: OIG Analysis

Dissemination of knowledge gained through research is essential to the CSSI award program and NIJ's effort to identify best strategies to improve school safety. The 239 CSSI research products form a valuable information repository available to enhance the public's access and understanding of ways to improve school safety and mitigate school violence. Moreover, the capacity of school officials and school safety stakeholders to safeguard children at school would benefit from improved access to research results concerning the prevention school shootings and other incidents of violence.

NIJ also convened various discussions and events that brought together researchers, educators, law enforcement, mental health professionals, and other subject matter experts to discuss CSSI projects. In February 2021, NIJ hosted a virtual event that featured projects that studied school climate, school resource officers, mental health, school violence, and school emergency preparedness. NIJ recorded and posted the virtual event online for public access. Overall, most award recipients reported that the NIJ events were valuable and told us that these events allowed them to network and share common challenges with other researchers. We believe that such events accentuated efforts to share and publicize school safety research contents resulting from CSSI awards.

In order to determine whether CSSI results contributed to the STOP School Violence Program and school safety research, we reviewed NIJ's efforts to compile and disseminate CSSI-produced research results across the different online portals and databases. We found that some of NIJ's compilation and dissemination of CSSI research results were limited. Specifically, grant research reports were not linked or "tagged" on OJP and NIJ program websites, thus hindering the public's ability to identify and access them.

Limited Publication or Identification of CSSI Research on NIJ's Listing Webpage

We reviewed NIJ's CSSI Publication Listing Webpage to determine its accessibility and sufficiency. We found that NIJ did not share or release all CSSI research contents on its main webpage listing. As of June 2022, NIJ's publication list webpage displayed 34 out of the 239 CSSI-funded research products (14 percent). At this time, the performance period of a majority of CSSI awards had lapsed and NIJ had received their respective final reports. However, NIJ had not published or linked most of these reports to its listing webpage.

Recognizing that end-users responsible for school safety (such as STOP School Violence Program award recipients) would benefit from improved access to critical CSSI findings, we raised this issue with NIJ officials. NIJ officials stated that some of the reports we could not locate had been posted or archived in some form to its websites, but that these reports were not linked or "tagged" as CSSI research reports. NIJ officials stated that NIJ would undertake a review to post and link CSSI research reports to its websites.

Some CSSI-Derived Research Content Requires Payment or Subscription to Access

OJP's National Criminal Justice Reference Service (NCJRS) database references CSSI research contents and associated documents by award numbers. When an individual searches an award number, NCJRS generates results to hyperlinked research reports, peer-reviewed scientific journals, or other documents relevant to that funded CSSI project.

To determine the availability of CSSI-derived research products linked on the NCJRS virtual database, we reviewed NIJ's internal project tracker spreadsheet and compared that with NCJRS search results of 93 CSSI awards from FY 2014 to FY 2017. We found that school safety stakeholders and potential users often would have to navigate through various webpages and paywalls in order to access CSSI-derived research contents, most of which were not otherwise available on NIJ's CSSI Publication Listing Webpage. We noted that while individuals are able to search for CSSI research contents on the NCJRS online library database, potential users would have to first obtain a CSSI award number before entering it into NCJRS database. We summarized our results in Table 3 below.

Table 3

NCJRS Research Results of CSSI

32	Completed CSSI awards with peer-reviewed research articles that require payment or institutional subscription for access and are not otherwise available on NIJ's CSSI Publication Listing Webpage.
8	Completed CSSI awards that have no documents posted to NCJRS and are not otherwise available on NIJ's CSSI Publication Listing Webpage.
9	Completed CSSI awards that may have research contents referenced but do not have a final report (an award deliverable) uploaded to NCJRS and are not otherwise available on NIJ's CSSI Publication Listing Webpage.

Source: OIG Analysis

In summary, 32 out of the 93 CSSI awardees (34 percent) have research results that require payment or an institution subscription for access. Individuals interested in accessing these research articles may only review the research abstract and summaries of methodology and results, not the full-length report, even though the subject reports include a CSSI funding acknowledgement. We also found instances when NIJ internally tracked research report references, but these references were not linked and referenced on NCJRS.

While CSSI award recipients submitted the required final reports to NIJ, NIJ officials stated that if an awardee had its final report published in a scientific journal, NIJ lacked the authority to release those journal articles to the public for free as such action would violate separate agreements made between the scientific journal and the awardee. According to NIJ, CSSI awardees are not required to provide advance notice to NIJ or receive prior approval for publication to a scientific journal.

However, this understanding does not appear to comport fully with standing policies and CSSI award conditions. In February 2013, the White House's Office of Science and Technology directed federal research agencies like NIJ to implement a plan to support increased public access to the results of federally funded research.⁶ In August 2022, the White House's Office of Science and Technology Policy issued another memorandum stressing the importance of public access to federal research results and recommending that federal agencies make publications and supporting data resulting from federally funded research publicly accessible.⁷ In addition, a CSSI award special condition, applicable to CSSI awardees themselves, stipulated that OJP reserved a royalty-free, non-exclusive, and irrevocable license to reproduce, publish, or otherwise use, and authorize others to use (in whole or in part, including in connection with derivative works), for

⁶ The White House's Office of Science and Technology Policy (OSTP), Memorandum for the Heads of Executive Departments and Agencies, [Increasing Access to the Results of Federally Funded Scientific Research](https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/ostp_public_access_memo_2013.pdf), February 22, 2013. https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/ostp_public_access_memo_2013.pdf

⁷ OSTP, Memorandum for the Heads of Executive Departments and Agencies, [Ensuring Free Immediate and Equitable Access to Federally Funded Research](https://www.whitehouse.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf) August 25, 2022. <https://www.whitehouse.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>

federal purposes: (1) any work subject to copyright developed under an award or subaward; and (2) any rights of copyright to which a recipient or subrecipient purchases ownership with federal support.⁸

Collectively, the online website (NIJ's CSSI Publication Listing Webpage) and database (OJP's NCJRS) on which NIJ has shared CSSI results do not provide school officials and school safety stakeholders with a clear and accessible method to find and obtain CSSI research results. The limited access to awardee's final reports along with the payment requirement to access CSSI scholarly journal articles could also hinder information sharing and cooperation among researchers, government officials, and school officials.⁹ While NIJ identified and disseminated some CSSI research contents, including collaborating with other federal officials on school safety matters, we believe that the enhanced sharing of CSSI research results and contents would improve the administration of the STOP School Violence Program and enable CSSI research to benefit other school safety initiatives.

Making federally funded research results available to the public can provide policymakers with important evidence, improve the rates of discovery, and create more equitable outcomes. Part of CSSI's six overarching goals is to identify the root causes of school violence and effective strategies to resolve safety issues. The limited amount of CSSI information available and freely accessible affects the overall utility of the program's research results. Therefore, we recommend OJP assess the accessibility of CSSI research results and take steps to confirm that school safety stakeholders and the public have appropriate access to completed CSSI research reports and contents. Such an effort should also consider how OJP can effectively ensure award recipient compliance with standing special conditions regarding its rights to reproduce, publish, or use research findings.

CSSI Award Selection, Measuring, and Monitoring

NIJ's Office of Grant Management (OGM), which oversees grant managers, works in conjunction with NIJ's social science research analysts and award recipients throughout the award lifecycle to facilitate the completion of funded projects. Specifically, the social science research analysts serve as technical scientific advisors while NIJ grant managers oversee programmatic and financial requirements set forth by the award conditions.

The NIJ's process for awarding competitive grants and cooperative agreements begins when NIJ posts solicitations. NIJ followed a standard process for awarding CSSI grant recipients. Once NIJ received applications, NIJ staff ensured the applications meet the basic minimum requirements outlined in the solicitations. Applications determined to meet minimum requirements undergo peer review by panels that

⁸ This special condition aligned with the tenets of the February 2013 Memorandum from the White House's Office of Science and Technology.

⁹ In a response to a draft of this report, NIJ stated that it, "requires final research reports of its research and evaluation awards, which are made available to the public on NIJ.gov. Many projects also result in the development of additional scholarly products published in academic journals. While NIJ does not control the paywall policies of individual academic journals, it encourages open science. Scholarly products are tracked during the project period and reporting is also encouraged post-award (e.g., <https://nij.ojp.gov/funding/grant-product-submission-form>). These abstracts and full-text links (if available) are also included in NIJ's publication listing."

score and rank the applications. NIJ officials recommend applications for funding based on these peer review scores and other criteria.

NIJ required CSSI awardees to follow grant requirements stipulated in the CSSI solicitations and the DOJ Financial Guide. To assess NIJ's oversight and administration of CSSI funds, we compiled documents from both OJP's Grant Management System (GMS) and Justice Grants System (JustGrants) to assess areas related to NIJ's performance measures, peer review process, conflict of interest, on-site visits, and progress reports.¹⁰

Documenting Peer Review and Conflict of Interest Disclosure Decisions

Careful vetting and review must be taken to ensure individuals serving as a peer reviewer are independent, objective, and qualified experts capable of assessing applications for OJP awards. An NIJ peer reviewer is responsible for evaluating, scoring, and ultimately recommending applications for funding. NIJ assigns peer reviewers to a panel to rate applications based on their subject matter expertise. As such, an OJP peer review services contract provides logistical support to sustain NIJ's peer review process. This support includes panel management, coordination of meetings, gathering of scores, and other administrative tasks related to the CSSI peer review process.

In order to determine whether NIJ adequately managed CSSI peer reviewers, we judgmentally selected a total of eight peer reviewers and reviewed their background and qualifications as well as their grant application assignments from FY 2014 to FY 2017. Overall, we found no issues related to the peer reviewers' assignments and ability to evaluate, score, and recommend grant applications.

OJP maintains several layers of conflict-of-interest policies and procedures over its employees and peer reviewers. According to OJP's Grants Management Manual (GMM), any grant manager who identifies a possible actual or apparent conflict of interest is to consult with the supervisor and document the outcome of the consultation.¹¹ The grant manager of the award is to document the justification and explanation concluding his or her conflict of interest finding. OJP's Peer Review Statement of Work also stipulates that if a peer reviewer reports a potential conflict of interest, the peer reviewer administrator must communicate this to an NIJ staff member to reassign the reviewer to another application, or to remove the reviewer entirely.

To assess NIJ's oversight and management of its conflict-of-interest procedures, we reviewed 16 disclosures, 10 from NIJ grant managers and social science research analysts and 6 from external peer reviewers assigned to review CSSI grant applications from FY 2014 to FY 2017. Based on available documentation, we found that NIJ decisions to remove a peer reviewer from an application due to a conflict of interest, at times, appeared inconsistent. For example, in FY 2014, a peer review panelist disclosed that he recognized a researcher's name on a grant application, yet NIJ determined that there was not a conflict of interest in that

¹⁰ To modernize and improve the functionality of the grants management system, NIJ replaced and transitioned from GMS to JustGrants around mid-October 2020.

¹¹ OJP's Grants Management Manual (GMM) documents policies and procedures for the administration and management of all OJP award programs. The manual includes standard policies, guidelines, and instructions for all activities associated with all stages of the grant management process.

case and the peer reviewer remained on the panel. In FY 2015, a peer review panelist disclosed that he recognized a co-principal investigator's name on a grant application and NIJ removed the peer reviewer from that specific grant application. We found that the description of these two disclosures were similar, yet each disclosure yielded a different determination from NIJ. Considering the length of time between these decisions and this audit, we could not conduct an in-depth examination of these cases to ascertain whether either decision was consistent with OJP's conflicts-of-interest policies or other authorities. Nevertheless, NIJ should demonstrate consistency in its future conflict of interest determinations.

Our review also found that one NIJ staff member reported a potential conflict of interest on an application related to a certain public school. The NIJ staff member stated that the disclosure form was also submitted to NIJ management. However, we could not locate an official NIJ determination or any documentation on whether the staff member's disclosure was deemed a conflict of interest.

The lack of context and documentation of NIJ's resolution of potential conflicts of interest increases the likelihood of inconsistent handling of disclosures and noncompliance with OJP's conflict of interest policies. We noted that NIJ maintains conflict-of-interest-summary spreadsheets that list grant manager and social science research analyst disclosures. These summary spreadsheets include employee names, solicitation titles, conflict-of-interest descriptions, date of conflict-of-interest submissions, affected application numbers, and the NIJ decisions. Since we were unable to locate NIJ's determinations for some of the reported conflict-of-interest matters as the associated spreadsheet records were left blank, we believe that additional detail, context, and justification related to the disclosures made by and submitted to NIJ staff would provide ready information to decisionmakers to facilitate consistent handling of such matters. Therefore, we recommend OJP to enhance its existing policies, procedures, and practices (such as its recordkeeping spreadsheets) to ensure that NIJ maintains adequate and complete documentation of reported conflict of interest matters, including both potential and actual conflicts of interests and appearances of conflicts of interest, as they arise for future initiatives.

Establishing Required Performance Measures

Federal awarding agencies are required to measure grant recipient performance to improve program outcomes, share lessons learned, and spread the adoption of promising practices.¹² Awardee performance measures—to include activities performed, services delivered, and results achieved—help to assess the outcomes of activities and accomplishments related to program goals and objectives.¹³

To track awardee performance, NIJ required that each CSSI award recipient provide financial and progress reports, peer-reviewed research and relevant citations, and applicable data sets. CSSI solicitations outlined three goal-relevant awardee performance measures, which NIJ subsequently tracked:

¹² 2 C.F.R. § 200.301.

¹³ The Government Performance and Results Modernization Act of 2010 requires that each federal agency publish an annual performance plan that describes how program activity contributed toward the agency's overarching performance goals. 31 U.S.C. § 1115(b)(3).

1. **Relevance** as measured by whether the project’s substantive scope deviated from the funded proposal or any subsequent agency-approved modifications to the scope.
2. **Research quality** as demonstrated by the scholarly products (such as published, peer-reviewed, scientific articles, law review journal articles), technological prototypes, patented inventions, or similar scientific products.
3. **Management Quality** as measured by factors such as whether the awardee met significant project milestones and kept costs within approved budget limits.

We determined that these performance measures aligned to the CSSI intended goals and objectives with regard to increasing scientific knowledge about the root causes of school violence. As a result, we were able to identify and verify the number and topic of research products prepared by CSSI awardees.

Coordinating On-Site Monitoring and Progress Reports

An adequate internal control framework outlines the responsibilities of various monitoring functions.¹⁴ NIJ relies on two different types of employees—grant managers and social science research analysts—to oversee and monitor the progress of CSSI award recipients via desk reviews, enhanced desk reviews, site visits, and progress reports. As discussed in this section, we found that NIJ has an opportunity to harmonize the social science research analyst and grant manager functions for the benefit and efficacy of its award oversight.

Desk Reviews and Site Visits

OJP monitors CSSI award recipients through annual or semiannual desk reviews performed by NIJ grant managers. A check list that has series of questions for programmatic, financial, compliance, and technical assistance matters guides the areas covered by these desk reviews. On-site visits and enhanced desk reviews are based on monitoring plan assessment, high-risk grantee designations, and an NIJ requirement that 10 percent of open grants undergo an annual review.

To determine whether NIJ adequately monitored CSSI awardees, we reviewed 12 sampled award monitoring reports. We confirmed that NIJ maintained almost all supporting documentation for monitoring and site visits. However, when we interviewed a selected awardee, the awardee official told us that NIJ’s social science research analysts had separately performed site visits to monitor research designs. We found that neither GMS nor JustGrants contained social science research analyst monitoring results. As such, we were unaware of such site visits until the grant recipient informed us of them. We further found that the award’s

¹⁴ U.S. Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*, GAO-14-704G (September 2014), 64 – 69.

NIJ grant manager was also not aware of such site visits. Upon request, the social science research analysts acknowledged they performed separate site visits.¹⁵

Progress Reports

Progress reports provide information regarding the achievements accomplished by the recipient in relation to project milestones and serve as the foundation for NIJ efforts to monitor CSSI grant performance. OJP's GMM lays out progress report procedures and instructs grant managers to review grant progress with four metrics related to: (1) performance measures and associated data, (2) status of each goal to be achieved, (3) possible implementation problems or corrective actions planned, and (4) possible training or technical assistance needed.

Grant managers that review progress reports may ask additional questions and request further supporting data until the awardee provides satisfactory responses. If a progress report is not submitted timely or otherwise approved, access to grant funds may be suspended until corrected. While the GMM requires that grant managers include metrics about grant performance as part of their progress review approval, the GMM does not require grant managers to document their rationale or conclusions before approving progress reports. In effect, the GMM leaves discretion to the grant managers to decide whether an awardee had made progress during each reporting period based on the grant's particular goals.

We reviewed progress reports from each sampled award recipient and found that the reports addressed required metrics. While the progress reports varied by format, quality, and quantity of supporting information submitted, we found the reports complied with the GMM requirements. Out of the 26 progress reports reviewed, we noted that grant managers commented in 17 instances (65 percent) that their progress reports approval did "not constitute validation or approval of the research activities or of any costs related to activities stated therein [the progress report]." NIJ officials stated that this comment served to clarify that such responsibilities had been assigned to social science research analysts and not the grant manager.¹⁶ However, there was no documentation of social science research analyst review in any of the reviewed progress reports.

Overall, the lack of policies and procedures in the GMM regarding the respective roles and responsibilities of social science research analysts in relation to grant managers about monitoring site visits and reviewing progress reports constitutes a weakness in NIJ's award monitoring process. Social science research analyst site visits can help accentuate NIJ oversight and support recipient efforts to meet research goals. However, policies to guide the communication and documentation of social science research analyst site visits would improve NIJ grant manager capacity to acquire a holistic overview of award performance and challenges. With such policies in place, grant managers and social science research analysts could (1) work in tandem to

¹⁵ We note that this occurrence is analogous to the findings found by the 2019 OIG audit. DOJ OIG, *NIJ Grants Management*, 18 – 19.

¹⁶ In response to the 2019 OIG audit of the NIJ's Grants Management, OJP created a performance plan for the social science research analysts, which included responsibilities to assess the performance and monitoring of prior year awardee deliverables. While the performance plan assigns these responsibilities, the GMM does not describe the roles and responsibilities of the social science research analysts with regard to progress reports or any other method to document performance or monitoring assessments. DOJ OIG, *NIJ Grants Management*, 18-19.

gain a better understanding of award activities when monitoring grant projects, (2) avoid unnecessary duplication of monitoring activities, and (3) provide meaningful progress report review input.

Therefore, we recommend OJP to update the GMM to outline the responsibilities of and facilitate coordination between grant managers and social science research analysts with regard to performing monitoring visits and reviewing progress reports submitted by recipients of research awards.

Conclusion and Recommendations

Since 2014, OJP's NIJ has administered CSSI to identify evidence-based school safety research results through more than 200 research products, some of which were complemented by research articles published in scientific peer reviewed journals. NIJ has also received positive feedback from CSSI award recipients for hosting events that brought together school safety researchers and various stakeholders to discuss key findings about school violence root causes, students' mental health, school emergency plans, and school resource officers.

CSSI research products are a valuable repository of information not just for school safety stakeholders, but also for the ongoing STOP School Violence Program and other school safety initiatives. Yet only a limited amount of CSSI research articles and contents had been identified or made available on NIJ's CSSI online website. Even when NIJ linked CSSI research products to the NCJRS database, some CSSI-derived research remained behind paywalls and thus were inaccessible to the public. With the conclusion of the CSSI award program, OJP and NIJ have an opportunity to assess and enhance the dissemination of these research findings.

While we did not identify reportable issues with CSSI performance measures, award goals, and peer review process, OJP can improve NIJ's conflict of interest and monitoring procedures. Specifically, NIJ did not maintain sufficient records regarding how it addressed conflict of interest disclosures. In addition, NIJ social science research analysts and grant managers did not collaborate to effectuate efficient award monitoring, site visits and progress reports.

Therefore, we recommend that OJP:

1. Assess the accessibility of CSSI research results and take steps to confirm that school safety stakeholders and the public have appropriate access to completed CSSI research reports and contents. Such an effort should also consider how OJP can effectively ensure award recipient compliance with standing special conditions regarding its rights to reproduce, publish, or use research findings.
2. Enhance its existing policies, procedures, and practices (such as its recordkeeping spreadsheets) to ensure that NIJ maintains adequate and complete documentation of reported conflict of interest matters, including both potential and actual conflicts of interests and appearances of conflict of interests, as they arise for future initiatives.
3. Update the GMM to outline the responsibilities of and facilitate coordination between grant managers and social science research analysts with regard to performing monitoring visits and reviewing progress reports submitted by recipients of research awards.

APPENDIX 1: Objectives, Scope, and Methodology

Objectives

The objective was to evaluate the Office of Justice Programs (OJP), National Institute of Justice's (NIJ) administration and oversight of the CSSI award program.

Scope and Methodology

The scope of this audit covered OJP and NIJ policies, procedures, and actions since FY 2014, when Congress first appropriated CSSI, through September 2022. We reviewed CSSI goals and objectives, peer review selection, awarding process, on-site monitoring of projects, progress reports, conflict-of-interest disclosures, grant database metadata, and dissemination of research results. We interviewed NIJ and OJP personnel, such as Senior Grant Management Specialist, former Director of Research and Evaluation, and Supervisory Operations Research Analyst, along with officials from BJA and COPS Office. We also examined award documentation, such as solicitations, desk reviews, on-site visit reports, progress reports, research reports, research articles, and database metadata such as timestamps and comments.

Statement on Compliance with Generally Accepted Government Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). 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 NIJ to provide assurance on its internal control structure as a whole. NIJ management is responsible for the establishment and maintenance of internal controls in accordance with OMB Circular A-123 and 2 C.F.R. § 200. Because we do not express an opinion on the NIJ's internal control structure as a whole, we offer this statement solely for the information and use of NIJ.¹⁷

In planning and performing our audit, we identified internal control components significant to the audit objective with reference to GAO Green Book. 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.

Sample-Based Testing

To accomplish our audit objective, we performed sample-based testing for awardee on-site monitoring, progress reports, and goals and objectives. In this effort, we employed a judgmental sampling design to

¹⁷ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

obtain broad exposure to numerous facets of the areas we reviewed. Specifically, we selected a total of 12 CSSI awardees for further testing and reviewed their award documentation based on factors related to awarded amount, project status, fiscal year(s), solicitations, organizational entity type, and research topics. Of these 12 sampled awardees, we discussed with 6 award recipients on how they used CSSI funds to research a wide range of school safety topics. 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 GMS and JustGrants. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

APPENDIX 2: Previous OIG Audit Work Related to CSSI

- U.S. Department of Justice (DOJ) Office of the Inspector General (OIG), [*Audit of the National Institute of Justice's Grants Management*](#), Audit Report 19-09 (February 2019).
- DOJ OIG, [*Audit of the Office of Justice Programs Comprehensive School Safety Initiative Grants Awarded to the Trustees of the University of Pennsylvania*](#), Audit Report GR-70-18-004 (February 2018).
- DOJ OIG, [*Audit of the Office of Justice Programs Comprehensive School Safety Initiative Grant Awarded to Central Falls School District*](#), Audit Report GR-70-19-010 (September 2019).
- DOJ OIG, [*Audit of the Office of Justice Programs Research Grant Awarded to the Cincinnati City School District for a Walking School Bus*](#), Audit Report GR-50-19-002 (March 2019).
- DOJ OIG, [*Audit of the Office of Justice Programs Awards to the Research Foundation of the City University of New York*](#), Audit Report GR-70-18-012 (September 2018).
- DOJ OIG, [*Audit of the Office of Justice Programs Developing Knowledge About What Works to Make Schools Safe Grant Awarded to the Pharr San Juan Alamo Independent School District*](#) Audit Report GR-60-17-009 (June 2017).
- DOJ OIG, [*Audit of the Office of Justice Programs National Institute of Justice School Safety Initiative Grants Awarded to the University of Virginia*](#) Audit Report GR-30-17-002 (May 2017).

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



U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

March 23, 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: Maureen A. Henneberg *MA 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' Administration of the Comprehensive School Safety Initiative*

This memorandum provides a response to the Office of the Inspector General's (OIG) March 1, 2023, draft audit report entitled, *Audit of the Office of Justice Programs' Administration of the Comprehensive School Safety Initiative*. The Office of Justice Programs (OJP) appreciates the opportunity to review and comment on the draft report.

The Comprehensive School Safety Initiative (CSSI) was a large-scale, integrated research effort designed to increase the safety of schools nationwide. It was initiated in 2014 at the request of Congress. The National Institute of Justice (NIJ) administered the CSSI as a research grant program. Through the CSSI, NIJ funded approximately 100 research-focused projects that contributed to building a solid foundation of rigorously tested, objective, and independent knowledge and best practices about school safety. The findings resulting from these projects cover topics across the spectrum of school safety concerns including, for example, school climate, law enforcement at school, school-related violence, bullying, student behavior, emergency operations, the causes and consequences of school violence, and trauma and mental health. The CSSI was carried out through partnerships between researchers, educators, and other stakeholders (including professionals and agencies involved in law enforcement, behavioral and mental health, courts, and other parts of the justice system). Congress provided funding for this initiative from 2014 to 2017. More recently, NIJ has funded research and evaluation efforts to assess the effectiveness of approaches funded under the Student, Teachers, and Officers Preventing (STOP) School Violence Act of 2018.

The draft audit report contains three 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. Assess the accessibility of CSSI research results and take steps to confirm that school safety stakeholders and the public have appropriate access to completed CSSI research reports and contents. Such an effort should also consider how OJP can effectively ensure award recipient compliance with standing special conditions regarding its rights to reproduce, publish, or use research findings.**

OJP agrees with this recommendation. NIJ has reviewed its CSSI research awards to ensure that grant-funded publications (e.g., final research reports and summary overviews) are publicly available on <https://nij.ojp.gov/>. Of the 17 CSSI awards identified by the OIG as not having a final research report, three have been published, eleven are under review, and one is pending revision by the grantee. The remaining two are pending NIJ determination of how to resolve the fact that they have copyrighted manuscripts appended to the report.

To further improve searchability and accessibility, NIJ will continue to tag the CSSI research reports, and other related scholarly products generated through CSSI awards, such as peer-reviewed journal articles, on the CSSI webpage. NIJ requires grant recipients to archive all data sets, that result in whole or in part from the work funded by the CSSI awards, along with associated files and any documentation necessary for future efforts by others to reproduce the project's findings, and/or to extend the scientific value of the data set through secondary analysis.

NIJ will identify needed changes related to grantee compliance with public access to grant-funded publications and related scientific data and implement solutions to those changes by September 30, 2023.

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

- 2. Enhance its existing policies, procedures, and practices (such as its recordkeeping spreadsheets) to ensure that NIJ maintains adequate and complete documentation of reported conflict of interest matters, including both potential and actual conflicts of interests and appearances of conflicts of interests, as they arise for future initiatives.**

OJP agrees with this recommendation. NIJ maintains documentation of staff (federal and other) potential conflicts of interest in the NIJ Consultant Information System. That documentation includes the nature of the conflict and its resolution. It also identifies the manager making the determination but does not document the rationale for the resolution.

Since 2020, NIJ has documented the removal of reviewers from a panel, for serious conflicts of interest (defined as those whose conflicts could not be resolved by re-paneling or recusal), in its funding recommendation memoranda. That documentation includes the rationale for removal. NIJ science staff normally document reviewer conflicts of interest on Excel spreadsheets. Determination of resolution is documented in emails.

NIJ will review how staff and peer reviewer conflicts of interest (potential and actual) are documented, and update its policies by September 30, 2023.

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

3. Update the GMM to outline the responsibilities of and facilitate coordination between grant managers and social science research analysts with regard to performing monitoring visits and reviewing progress reports submitted by recipients of research awards.

OJP agrees with this recommendation. The OJP Office of Audit, Assessment, and Management will update the Grants Management Manual (GMM) to include the responsibilities of and coordination between NIJ Grant Managers and Social Science Research Analysts with regard to monitoring and reviewing progress reports submitted by grantees. OJP intends to release an updated GMM no later than June 30, 2023.

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, and for your continued collaboration to improve the administration of our grant programs. 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: Amy L. Solomon
Principal Deputy Assistant Attorney General

Nancy La Vigne
Director
National Institute of Justice

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

Rachel Johnson
Chief Financial Officer

Rafael A. Madan
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cc: Jennifer Plozai
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Louise Duhamel
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Correspondence Control Number: OCOM000184

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

The OIG provided a draft of this audit report to the Office of Justice Programs (OJP). OJP's response is incorporated in Appendix 3 of this audit report. In response to our draft audit report, OJP agreed with all three of our recommendations. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for OJP:

- 1. Assess the accessibility of CSSI research results and take steps to confirm that school safety stakeholders and the public have appropriate access to completed CSSI research reports and contents. Such an effort should also consider how OJP can effectively ensure award recipient compliance with standing special conditions regarding its rights to reproduce, publish, or use research findings.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that NIJ has reviewed its CSSI research awards to ensure grant-funded publications are publicly available on its website. OJP further stated that of the 17 CSSI awards identified as not having a final research report, 3 have been published, 11 are under review, and 1 is pending revision by the grantee. The remaining two are pending NIJ's determination to resolve the copyrighted manuscripts appended to the research report. OJP also stated that NIJ will continue to tag CSSI research reports and other related scholarly products on to the CSSI webpage. Lastly, OJP stated that NIJ requires its grant recipients to archive data sets and associated files for future efforts by others to reproduce the project's findings.

This recommendation can be closed when OJP provides evidence that NIJ has taken steps to ensure that school safety stakeholders and the public have appropriate access to completed CSSI research reports and contents. Additionally, such evidence should demonstrate (1) NIJ's determination of needed changes related to grantee compliance with public access to grant-funded publications and (2) how OJP has implemented solutions to those changes.

- 2. Enhance its existing policies, procedures, and practices (such as its recordkeeping spreadsheets) to ensure that NIJ maintains adequate and complete documentation of reported conflict of interest matters, including both potential and actual conflicts of interests and appearances of conflicts of interests, as they arise for future initiatives.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that NIJ maintains documentation related to potential conflict of interest matters among staff members in the NIJ Consultant Information System. While the NIJ Consultant Information System includes information related to the nature of the conflict and its resolution, OJP stated that it does not document the rationale for the resolution. OJP further stated that since 2020, NIJ has documented the removal of reviewers from a panel for serious conflicts of interest (conflicts that could not be resolved by re-paneling or recusal) along with the rationale for removal. Lastly, OJP stated that NIJ will review how staff and peer reviewer conflicts of interest (potential and actual) are documented and make

updates to its policies.

This recommendation can be closed when OJP provides evidence that it has reviewed and made necessary updates to its existing policies, procedures, and practices (such as recordkeeping spreadsheets) related to the adequate documentation of potential and actual conflict of interest matters. Additionally, OJP needs to also provide evidence that it has informed its staff members on the enhanced policies and procedures and implemented those policies related to the documentation of conflict of interest.

3. Update the GMM to outline the responsibilities of and facilitate coordination between grant managers and social science research analysts with regard to performing monitoring visits and reviewing progress reports submitted by recipients of research awards.

Resolved. OJP agreed with our recommendation. OJP stated in its response that OJP's Office of Audit, Assessment, and Management will update the Grants Management Manual (GMM) to include the responsibilities of and coordination between NIJ grant managers and social science research analysts with regard to monitoring and reviewing progress reports submitted by grantees. OJP stated that it intends to release an updated GMM no later than June 2023.

This recommendation can be closed when OJP provides evidence of an updated GMM as well as evidence of a dissemination (e.g., an email, a memo, training materials, etc.) that outlines the responsibilities of, and facilitates the coordination between, NIJ grant managers and social science research analysts.