United States Government Accountability Office

Report to the Ranking Member, Committee on Natural Resources, House of Representatives

May 2024

DOJ GRANTS MANAGEMENT

Further Steps Could Improve Efforts Taken to Address Early Grants IT Modernization Challenges

GAO-24-106501

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GAO Highlights

Highlights of GAO-24-106501, a report to the Ranking Member, Committee on Natural Resources, House of Representatives

Why GAO Did This Study

DOJ's transition to JustGrants delayed some of the department's approximately $4.3 billion in grants and cooperative agreements in fiscal year 2021, according to the DOJ Office of the Inspector General.

GAO was asked to examine users' challenges with the transition to JustGrants. This report (1) describes the challenges of external users, including tribal grantees, and the steps DOJ took to address them; and (2) assesses the extent to which DOJ's engagement with external users aligned with leading practices of organizational change management.

GAO analyzed data on user inquiries to the JustGrants help desk in fiscal years 2021 through 2023 and reviewed documents related to tribal consultations. GAO interviewed (1) DOJ officials, (2) officials from a nongeneralizable selection of four Tribes and one tribal organization, and (3) two training and technical assistance providers. GAO also assessed DOJ's alignment with leading practices for organizational change management by reviewing DOJ documents.

What GAO Recommends

GAO is making three recommendations to DOJ, including that OJP should establish and document an approach to ensure that future organizational change management programs related to grants management develop quantifiable and intermediate performance goals. DOJ concurred with all three recommendations.

View GAO-24-106501. For more information, contact Gretta L. Goodwin at (202) 512-8777 or GoodwinG@gao.gov.

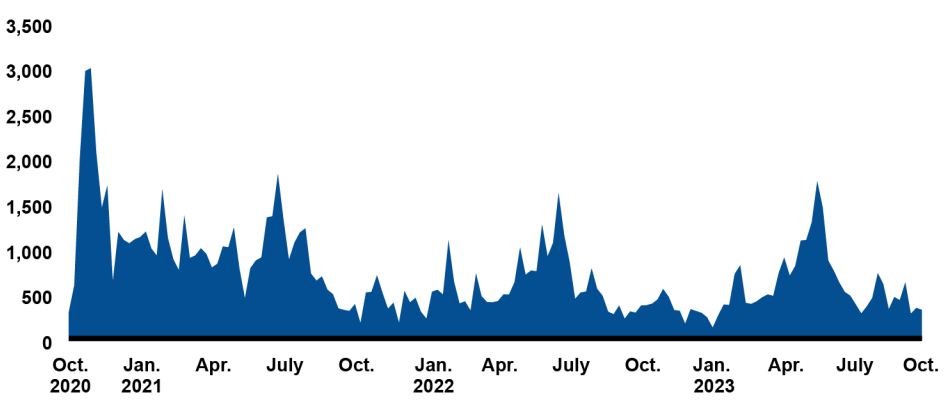
What GAO Found

In October 2020, the Office of Justice Programs (OJP) within the Department of Justice (DOJ) launched a new grants management system, known as the Justice Grants System (JustGrants), to modernize grants management for all of DOJ's grantmaking components: OJP, the Office on Violence Against Women, and the Office of Community Oriented Policing Services.

JustGrants launched with features needed to support basic functionality, though many features did not perform as expected. For example, some grant recipients could not submit financial or programmatic reports, which are used to report expenditures and grant progress. OJP's help desk, which provides technical and other support to JustGrants users, received about 56,000 inquiries from external users in fiscal year 2021. This included nearly 10,000 inquiries in the first 4 weeks after JustGrants launched. Tribal grantees and applicants reported proportionally about the same number of issues as other users in most categories. These issues included navigation challenges, technical glitches, and funding delays.

Since October 2020, OJP has worked to develop technical features and fixes to increase the functionality of the system and reduce issues. OJP officials stated that they have continued to educate external users to improve their ability to use JustGrants. Inquiries to the help desk decreased by 48 percent from fiscal year 2021 to 2022 and continued at a similar level in fiscal year 2023 (see figure).

External Users' Inquiries to the JustGrants Help Desk by Week, October 2020 through September 2023



Source: GAO analysis of Department of Justice data. | GAO-24-106501

Prior to implementing JustGrants, OJP adopted an organizational change management approach to facilitate users' transition to JustGrants and shared systems. GAO found that OJP's engagement with external users fully aligned with five of the seven leading practices. GAO also found that OJP's activities partially aligned with two of the seven leading practices. For example, although OJP collected performance data on the transition to JustGrants, it did not establish quantifiable and intermediate performance goals. Tracking the transition to JustGrants using such performance goals would have allowed OJP to make necessary adjustments during the change management process.

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Abbreviations

COPS Office	Office of Community Oriented Policing Services
DOJ	Department of Justice
JustGrants	Justice Grants System
OJP	Office of Justice Programs
OVW	Office on Violence Against Women
SAM	System for Award Management
UFMS	Unified Financial Management System

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE
441 G St. N.W.
Washington, DC 20548

May 9, 2024

The Honorable Raúl M. Grijalva
Ranking Member
Committee on Natural Resources
House of Representatives

Dear Mr. Grijalva:

In October 2020, the Department of Justice (DOJ) transitioned to a new grants management system to keep pace with business needs and to address potential cybersecurity risks. However, when the new grants management system, the Justice Grants System (JustGrants), was launched, it did not perform as expected. Users—including tribal applicants and grantees—faced a variety of challenges. These challenges included learning how to access and navigate a new system and new processes, as well as technical issues, including registering in JustGrants and in related systems and applying for, accepting, and managing awards. Additionally, the transition to JustGrants caused a delay in funding for some DOJ grants in fiscal year 2021, according to the DOJ Office of the Inspector General.[1]

In fiscal year 2023, DOJ awarded 5,726 grants and cooperative agreements totaling approximately $5.7 billion through its three primary awarding components: the Office of Justice Programs, the Office of Community Oriented Policing Services, and the Office on Violence Against Women. Of those grants, DOJ awarded 573 grants totaling over $281 million to Tribes and tribal partners.

You asked us to review issues that tribal and non-tribal users experienced transitioning to JustGrants. This report examines (1) the challenges that external users, including tribal grantees, experienced with JustGrants and the steps DOJ took to improve external users' experiences; and (2) the extent to which DOJ's engagement with tribal and other users on JustGrants aligned with organizational change management leading practices.

[1]Department of Justice, Office of the Inspector General, *Audit of the Office of Justice Programs' Procurement for the JustGrants System*, 23-087 (Washington, D.C.: July 6, 2023).

To address the first objective, we examined data that DOJ collected on inquiries it received from external (non-DOJ) users through its JustGrants help desk from October 1, 2020, through September 30, 2023. This covers the period from the JustGrants launch through the most recently completed fiscal year.[2] We examined these data for errors such as missing data and outliers and interviewed DOJ officials familiar with the data and how those data were collected. We determined that these data were sufficiently reliable for the purpose of reporting on the volume and type of help desk inquiries by tribal and non-tribal users over this period. In addition, we reviewed DOJ documents, including records of DOJ consultations with Tribes in fiscal years 2021 and 2022.

We also reviewed a January 2022 consultant report produced for DOJ to assess the agency's progress addressing outstanding issues with JustGrants.[3] In addition, we reviewed a DOJ Office of the Inspector General report on JustGrants, which surveyed external users about the transition to JustGrants.[4] To learn about tribal grantees' perspectives on the transition to JustGrants, we contacted 13 Tribes and five tribal organizations. We selected these Tribes and organizations from among those that received DOJ funding in fiscal year 2021, fiscal year 2022, or both—and thus had used JustGrants to apply for and receive program funding. We sought to include Tribes and organizations located in both the contiguous United States and in Alaska. Officials from four Tribes and one tribal organization agreed to meet with us and with these we conducted nongeneralizable, semi-structured interviews. We also conducted interviews with two providers that offer training and technical assistance to Tribes.[5] In addition, we interviewed DOJ officials responsible for the planning, development, and roll out of JustGrants.

To address the second objective, we developed a set of seven leading practices for organizational change management that apply to external

[2]DOJ used two workflow management systems to track help desk inquiries during this time period: the department used one product until March 16, 2022, and another product thereafter.

[3]The Clearing, *JustGrants Program Review* (Washington, D.C.: January 2022).

[4]Department of Justice, Office of the Inspector General*, Audit of the Office of Justice Programs' Procurement for the JustGrants System*.

[5]One of the training and technical assistance service providers also supports non-tribal criminal justice professionals in rural and under-resourced communities.

users.[6] We reviewed DOJ strategies and planning documents, emails to external JustGrants users, and training and other educational documents on DOJ's external website to help assess DOJ's organizational change management approach. We also interviewed DOJ officials involved in the design and execution of the organizational change management approach. We then assessed whether DOJ's practices aligned, partially aligned, or did not align with the leading practices we developed. A determination of "aligned" means DOJ provided evidence that it had adopted all elements of the practice. A determination of "partially aligned" means that DOJ provided evidence that it adopted or applied some but not all elements of the leading practice. A determination of "did not align" means that DOJ did not provide evidence that it adopted any of the elements of the leading practice.

We conducted this performance audit from January 2023 to May 2024 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.

Background

DOJ administers a wide range of programs and services for federally recognized Tribes and their citizens.[7] As of January 2024, there were 574 federally recognized Tribes in the United States.[8] Additionally, Tribal citizens may identify as American Indian and Alaska Native, a racial

[6]We based the leading practices on our review of four source documents. See The Association of Change Management Professionals, *Standard for Change Management©* and *ACMP Change Management Code of Ethics*, First Edition (Washington, D.C.: 2019); The Project Management Institute, Inc. (PMI®), *Managing Change in Organizations: A Practice Guide*, (Newtown Square, PA: 2013); Office of Personnel Management, *Migration Planning Guidance Information Documents: Change Management Best Practices* (Washington, D.C.: October 2011); and GAO, *Business Process Reengineering Assessment Guide—Version 3*, GAO/AIMD-10.1.15 (Washington, D.C.: May 1997).

[7]The United States has a trust responsibility to federally recognized Indian Tribes (Tribes), maintains a government-to-government relationship with such Tribes, and recognizes their sovereignty. See Federally Recognized Indian Tribe List Act of 1994, Pub. L. No. 103-454, tit. I, § 103, 108 Stat. 4791 (codified at 25 U.S.C. § 5130 note).

[8]See Indian Entities Recognized by and Eligible To Receive Services From the United States Bureau of Indian Affairs, 89 Fed. Reg. 944 (Jan. 8, 2024). Each year, the Secretary of the Interior must publish in the Federal Register the list of recognized Tribes that are eligible for special programs and services provided by the federal government. See Pub. L. No. 103-454, tit. I, § 104, 108 Stat. at 4792 (codified at 25 U.S.C. § 5131).

classification.[9] According to 2020 Census estimates, the population of self-identified American Indians and Alaska Natives, including those of more than one race, was 9.7 million (roughly 2.9 percent of the U.S. population).[10]

DOJ offers funding opportunities to support law enforcement and public safety activities in state, local, and tribal jurisdictions; to assist victims of crime; to provide training and technical assistance; to conduct research and collect national statistics; and to implement programs that improve the criminal, civil, and juvenile justice systems. Such funding can take the form of discretionary grants, formula grants, cooperative agreements, and payment programs, among others. For purposes of this report, we use the general term "grants" to refer to such funding.

Roles and Responsibilities

DOJ has three grantmaking components:

Office of Justice Programs. The Office of Justice Programs (OJP) provides grants to tribal jurisdictions and 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 knowledge about crime and related issues, and assist crime victims in communities across the nation.

Office of Community Oriented Policing Services Office. The Office of Community Oriented Policing Services (COPS) is responsible for advancing the practice of community policing by the nation's tribal, state, local, and territorial 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.

Office on Violence Against Women. The Office on Violence Against Women (OVW) provides federal leadership in developing the national

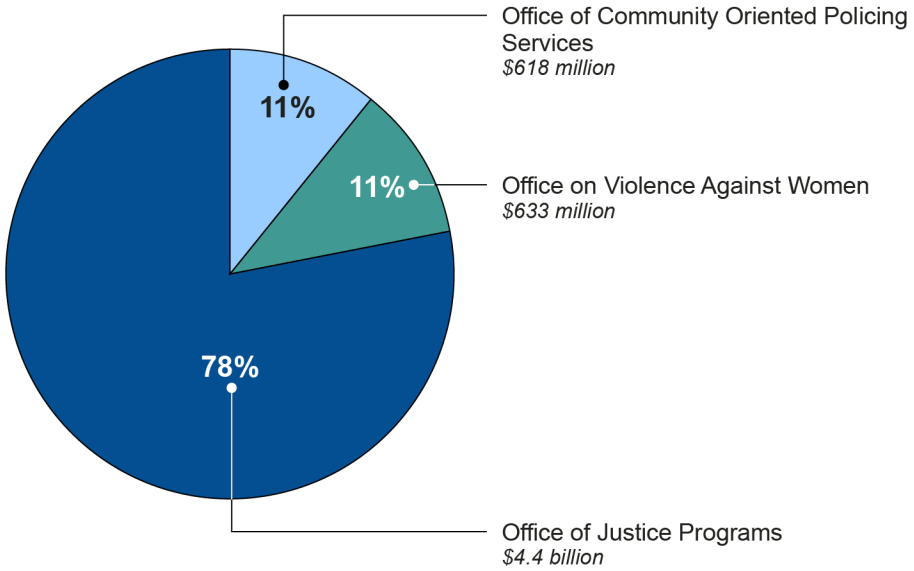
[9]The U.S. Census Bureau defines American Indian and Alaska Native as "a person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment."

[10]Not every person who identifies as American Indian or Alaska Native is an enrolled citizen of a federally recognized Tribe or is eligible for programs that are provided to Tribes and their citizens because of their political status.

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.[11] 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.

OJP is the largest of DOJ's grantmaking components and in fiscal year 2023 awarded approximately $4.4 billion in grants, as shown in figure 1. OJP awarded approximately $164 million of this amount to tribal entities. Its mission to develop the nation's capacity to prevent and control crime, administer justice, and assist crime victims is broader than that of OVW or the COPS Office.

Figure 1: Fiscal Year 2023 Grants Awarded by the Office of Justice Programs, Office on Violence Against Women, and the Office of Community Oriented Policing Services



Source: GAO analysis of Department of Justice information. | GAO-24-106501

[11]See Violence Against Women Act of 1994, Pub. L. No. 103-322, tit. IV, 108 Stat. 1902 (codified in pertinent part and as amended at 34 U.S.C. §§ 10441-10465, 12291-12514, 20121-20129, and 25 U.S.C. § 1304(h)).

DOJ Transitioned to New Grant Management System in 2020

On October 15, 2020, DOJ's Justice Grants System (JustGrants) replaced two legacy systems—Grant Management System for OJP and OVW and NexGen for the COPS Office—to modernize and improve the functionality of the department's grants management system.[12] For further information on this and related events, see appendix I.

JustGrants is an end-to-end grants management system used by applicants, grantees, and internal DOJ users to manage the entire life cycle of a grant, which includes applicants applying for opportunities and grantees accepting and implementing the awards. The transition required integration of (1) DOJ's grant, financial, and payment systems; (2) other active federal databases; and (3) multiple existing systems that supported individual grant programs or assisted the grantmaking components with oversight and review.[13]

Approximately 68,000 external (non-DOJ) users, such as grant applicants and grantees, across about 15,000 different entities use JustGrants, according to OJP.[14] In addition, approximately 1,200 internal users utilize JustGrants to perform a variety of functions across the grant's life cycle. These functions include solicitation posting, application submission and receipt, award making and notification, performance management, financial reporting, monitoring, and closeout. Users must first go through onboarding, a term used to describe the process and activities necessary to submit grant applications and use JustGrants, including registering with

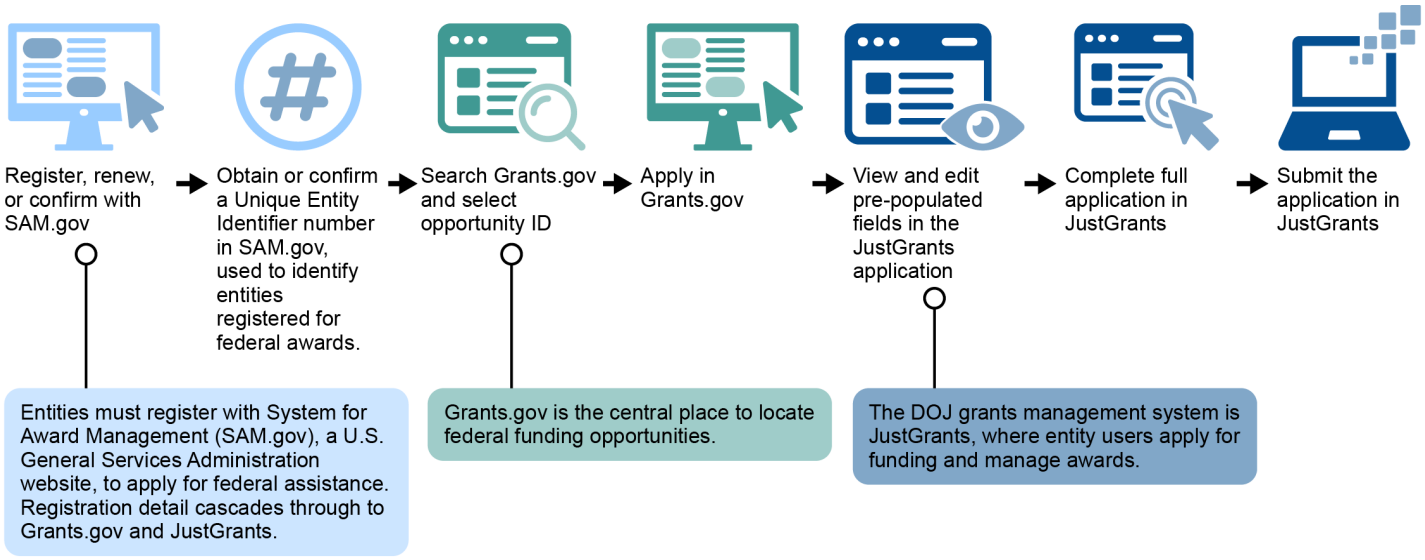
[12]In 2017, DOJ directed grant-making components maintain one grants management system for the department. Around the same time, the DOJ was moving to the Unified Financial Management System (UFMS), which streamlines and standardizes financial business processes and procedures across the DOJ. Part of the transition in moving forward with UFMS was for the grantmaking components to join UFMS in October 2020. The expectation was that JustGrants would go live and integrate at the same time. JustGrants pulls financial and entity information from DOJ's UFMS, which directly interfaces with the System for Award Management (SAM).

[13]The grant monitoring function in JustGrants was not available at the time of its launch and is still unavailable, as of January 2024. As a result, DOJ's grant components monitor grantees through different mechanisms. For example, the COPS Office uses the Grant Monitoring Information System in its NexGen system to support its monitoring function needs.

[14]The total number of external (non-DOJ) JustGrants users increased from about 19,000 as of September 30, 2020, to about 68,000, as of September 30, 2023, according to OJP.

System for Award Management (SAM), and applying for DOJ funding in Grants.gov, as shown in figure 2 below.[15]

Figure 2: Process for Submitting Department of Justice (DOJ) Grant Applications



Source: Department of Justice (DOJ); GAO adaptation of Icons-Studio/stock.adobe.com (illustrations). | GAO-24-106501

OJP was responsible for designing and developing an information technology solution to support the grants management life cycle both for internal and external users. As it concerns the various shared systems, OJP's role includes working with the agencies that manage the shared systems regarding the integration of the shared services and data with JustGrants.

DOJ's Grant Programs Include Awards Specifically for Tribes

From October 2020, when the system went live, through September 2023, DOJ awarded 16,660 grants for over $15 billion in funding. DOJ awarded 1,504 of those grants to tribal entities that totaled approximately $809 million in grant funding.[16] Included in the grants awarded to tribal

[15]The grant monitoring function in JustGrants was not available at the time of its launch and was still unavailable, as of January 2024. As a result, DOJ's grant components monitor grantees through different mechanisms. For example, the COPS Office uses the Grant Monitoring Information System in its NexGen system to support its monitoring function needs.

[16]The word entity is used in place of a grant applicant or recipient. Most entities in JustGrants are organizational entities composed of multiple individuals, but an entity can also be a single individual.

entities are programs intended specifically for Tribes. For example, OVW administers tribal-specific programs, including the Tribal Domestic Violence and Sexual Assault Coalitions Program, Special Tribal Criminal Jurisdiction Grant Program, and Tribal Sexual Assault Services Program.[17] Tribes may apply for several tribal-specific programs administered by OJP and the COPS Office through the Coordinated Tribal Assistance Solicitation. The Coordinated Tribal Assistance Solicitation combines tribal government-specific competitive solicitations into one solicitation and requires only one application from each Tribe or tribal consortium.[18]

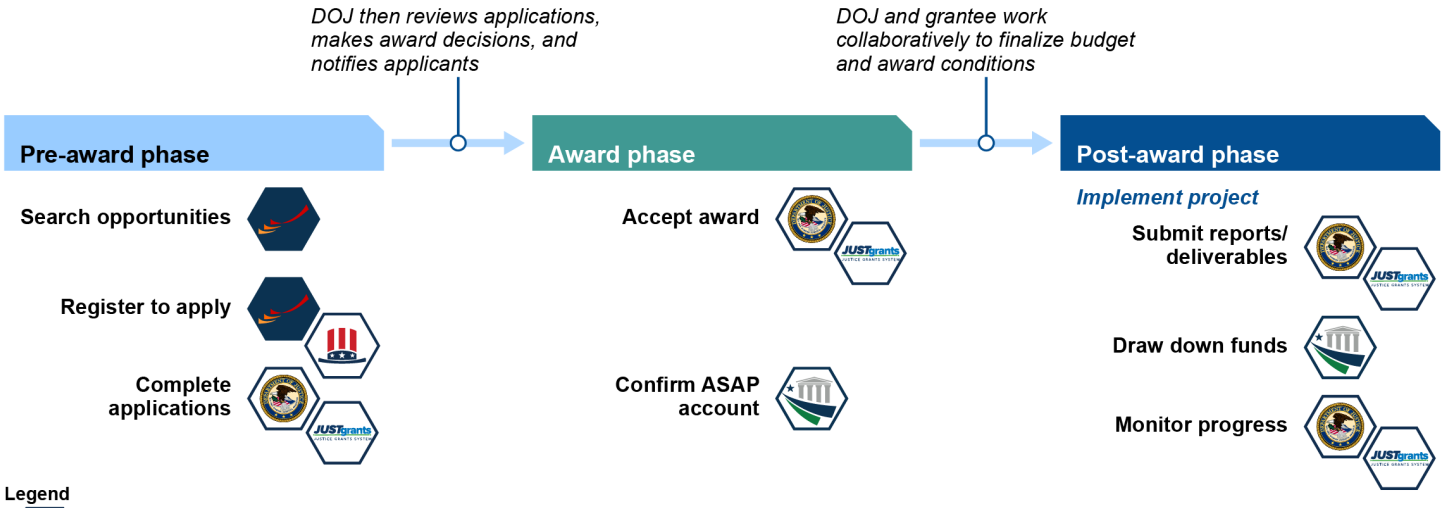
Overview of the Information Systems Supporting DOJ Grant Life Cycle

Five information technology systems, including JustGrants, are used to manage and support the grants awarded by OJP, OVW, and the COPS Office. Such grants generally follow a similar life cycle, including pre-award, award, and post-award phases, which is shown in figure 3.

[17]Until fiscal year 2023, this grant program was called Grants to Tribal Governments to Exercise Special Domestic Violence Criminal Jurisdiction.

[18]A tribal consortium is a group of two or more federally recognized Tribes that is authorized by the member Tribes to apply for and receive grants under the Coordinated Tribal Assistance Solicitation.

Figure 3: Information Systems that Support Department of Justice (DOJ) Applicant and Award Recipient Grants Life Cycle



Legend

The System for Award Management (SAM.gov) is used for various purposes, including registering to do business with the U.S. government and to maintain current entity registration, key data, and points of contact.

Grants.gov is a website for federal agencies to post discretionary funding opportunities and for grantees to find and apply to them.

Digital Identity and Access Management Directory (DIAMD) allows entities to manage users and roles in JustGrants.

JustGrants is an end-to-end grants management system used by applicants, grantees, and internal DOJ users to manage the entire life cycle of a grant.

Automated Standard Application for Payments (ASAP) is a Department of the Treasury shared service for grant payments. ASAP allows organizations receiving federal funding to draw funds securely through pre-authorized accounts established by the agency issuing the payment.

Source: GAO analysis of Department of Justice (DOJ) information; logos courtesy of respective agencies. | GAO-24-106501

Tribal users must use JustGrants and the external shared systems, as all users do. For example, to access JustGrants as part of the onboarding process, users need to register with SAM.gov[19] (managed by the General Services Administration) and be able to use Grants.gov[20] (managed by

[19]The System for Award Management (SAM.gov) is used for various purposes, including registering to do business with the U.S. Government.

[20]Managed by the Department of Health and Human Services, Grants.gov is an E-Government initiative operating under the governance of the Office of Management and Budget. Grants.gov centralizes more than 1,000 different grant programs across federal grantmaking agencies awarding more than $500 billion annually. It also standardizes grant information, application packages, and processes for finding and applying for federal grants.

the Department of Health and Human Services), as shown in figure 2 above. In addition, grantees use the Department of the Treasury's Automated Standard Application for Payments to receive their grant funding.[21]

Organizational Change Management

Organizational change management involves applying an organized and structured framework to move from a current state to a future state to achieve an expected benefit.[22] Transitioning to JustGrants was a significant change for external users of the legacy systems. The transition required external users to enroll in and learn how to use JustGrants and properly register in SAM.gov and Automated Standard Application for Payments, among other challenges. Therefore, DOJ adopted an organizational change management approach to support the transition to JustGrants and the shared systems noted above.

External Users Reported Challenges with JustGrants, and DOJ is Taking Steps to Improve System

External Users Experienced Some Challenges When JustGrants First Launched

Some grant applicants and recipients experienced problems related to JustGrants not performing as expected and complexities related to its integrated shared systems.[23] JustGrants launched in October 2020 with only the features needed to support basic functionality to move grant applications through the system, issue new awards, and manage existing awards, according to OJP officials. OJP stated that this was a reduced scope from the original plan to meet the timeline for integration with the

[21]Automated Standard Application for Payments is a Department of the Treasury shared service for grant payments. Automated Standard Application for Payments allows organizations receiving federal funding to draw funds securely through pre-authorized accounts established by the agency issuing the payment. The Automated Standard Application for Payments replaced Grant Payment Request System, the previous system grantees used to draw down grant funding.

[22]Office of Personnel Management, *Migration Planning Guidance Information Documents: Change Management Best Practices (Washington, D.C.: October 2011)*.

[23]JustGrants interfaces with the Department of the Treasury's Automated Standard Application for Payments for grantee payments, Grants.gov for the common grants application portal, DOJ's enterprise-wide Unified Financial Management System, and OJP's Digital Identity and Access Management Directory, as shown in figure 3.

DOJ's Unified Financial Management System.[24] OJP also acknowledged that, over the course of the transition to JustGrants, many users experienced instances in which JustGrants did not perform as expected. This gap in performance was due to data migration complexities, the system not fully being built out, incomplete entity pre-launch actions, and technical performance issues. For example, some grant recipients could not submit financial or programmatic reports, which are used to report expenditures and grant progress to DOJ. As a result, DOJ provided grantees extensions for deadlines related to reporting and announced it would not suspend any funds due to late report submissions until the technical issues were addressed.

Some external users also faced challenges accepting awards and submitting requests for award modifications. These challenges could hinder the grantees' ability to achieve the goals and objectives in the timeline originally established in their award. They also could have affected the efficiency of internal grants management processes for documentation of monitoring of the awards. 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 Automated Standard Application for Payments, and to use multi-factor authentication to enhance security. Collectively, these challenges caused significant frustration for external users, according to the DOJ Office of Inspector General, OJP officials, and DOJ grantees, as discussed below.

A 2022 report by a consultant engaged by OJP to assess OJP's development and implementation of JustGrants noted that OJP reduced the scope of JustGrants to meet the October 2020 launch deadline—which contributed to the JustGrants-related technical issues.[25]

[24]According to OJP officials, JustGrants launched with the minimum features developed for basic functionality, which included user and access management roles; integration to Automated Standard Application for Payments, Grants.gov and UFMS; and operations necessary to move applications though the essential stages of the grant management life cycle. However, according to The Clearing, Inc., a consultant that OJP hired, the agency had not completed a minimum viable product by October 2020. OJP planning documents define the minimum viable product as the smallest slice of end-to-end features and functionality necessary to meet the business need. As of November 2023, OJP officials told us that they plan to implement additional functionality of the basic grant life cycle that was not part of the launch, including in the areas of performance management and monitoring.

[25]The Clearing, Inc., *JustGrants Program Review* (Washington, D.C. 2022).

According to a DOJ Office of the Inspector General survey, administered from March 28, 2022, to April 4, 2022, 76 percent of responding external JustGrants users reported experiencing technical issues since JustGrants launched in 2020.[26] These technical issues included navigation challenges, technical glitches, issues with the JustGrants help desk, and problems submitting reports in the system.

OJP's help desk, which provides technical and other support to JustGrants users, received about 55,800 inquiries from external users in fiscal year 2021, including nearly 10,000 inquiries in the first 4 weeks after JustGrants launched.[27] OJP's help desk triages incidents reported to its help desk by JustGrants users. According to OJP officials, the help desk determines whether the incident is (1) a JustGrants system issue, (2) a training or technical assistance request, or (3) an issue with a system operated by a different federal agency (i.e., SAM.gov, Grants.gov, or Automated Standard Application for Payments). Inquiries to the help desk concerned a variety of issues, such as onboarding.

For example, JustGrants users also needed to enroll in the Department of the Treasury operated payment system, Automated Standard Application for Payments, for recipients to draw down funds, as noted above. However, at the time DOJ launched JustGrants, only half of the users that had received registration instructions completed the steps needed to be fully onboard with the new system, such as enrolling in the new payment system, according to OJP. By the end of November 2020, OJP's financial

[26]The Office of the Inspector General sent the survey to 30,792 external users and 6,404 (21 percent) responded; 5,573 users responded to this question. Department of Justice, Office of the Inspector General, *Audit of the Office of Justice Programs' Procurement for the JustGrants System*, 23-087 (Washington, D.C.: July 6, 2023).

[27]OVW and the COPS Office also operate help desks to support their grant applicants and award recipients. However, OJP's JustGrants help desk is more of a true information technology support help desk. In contrast, the OVW help desk provides more of a customer service function, according to OVW officials. Many of the inquiries the OVW help desk receives are questions regarding how something is not working and the steps the user should take to address the issue. For example, an inquiry might concern a user's assigned role that does not allow them to access or carry out specific tasks in JustGrants, and OVW help desk staff would help them adjust their assigned role, accordingly. The OVW help desk directs inquiries it cannot address to the OJP JustGrants help desk, which are then captured in the OJP help desk data. Similarly, the COPS Office help desk includes support for management of grant and cooperative agreement awards and helps with award acceptance, grant extensions, budget modifications, performance and financial report inquires, accessing grant funds, award closeouts, and other grant-related issues general assistance when grantees and applicants cannot access or carry out specific tasks in JustGrants. As necessary, the COPS Office help desk will also direct inquiries that require technical support to the OJP JustGrants help desk.

office staff had reached out over 2,700 times to support the Automated Standard Application for Payments enrollment transition activities. There was also additional outreach conducted by staff across OJP, COPS Office, and OVW to support users in completing these steps.

In fiscal year 2021, about one-third of help desk inquiries were related to entity and user management issues, which refer to users' ability to access JustGrants and linked systems.[28] According to OJP, in the same year, 18 and 25 percent of external inquiries were related to issues during the pre-award and post-award phases, respectively. Inquiries during the pre-award phase include issues with grant solicitations and application submission. Inquiries during the post-award phase include Grant Award Modifications and Federal Financial Reports.[29]

Overall Volume and Types of Inquiries to the JustGrants Help Desk for External Users Declined From 2021 to 2023

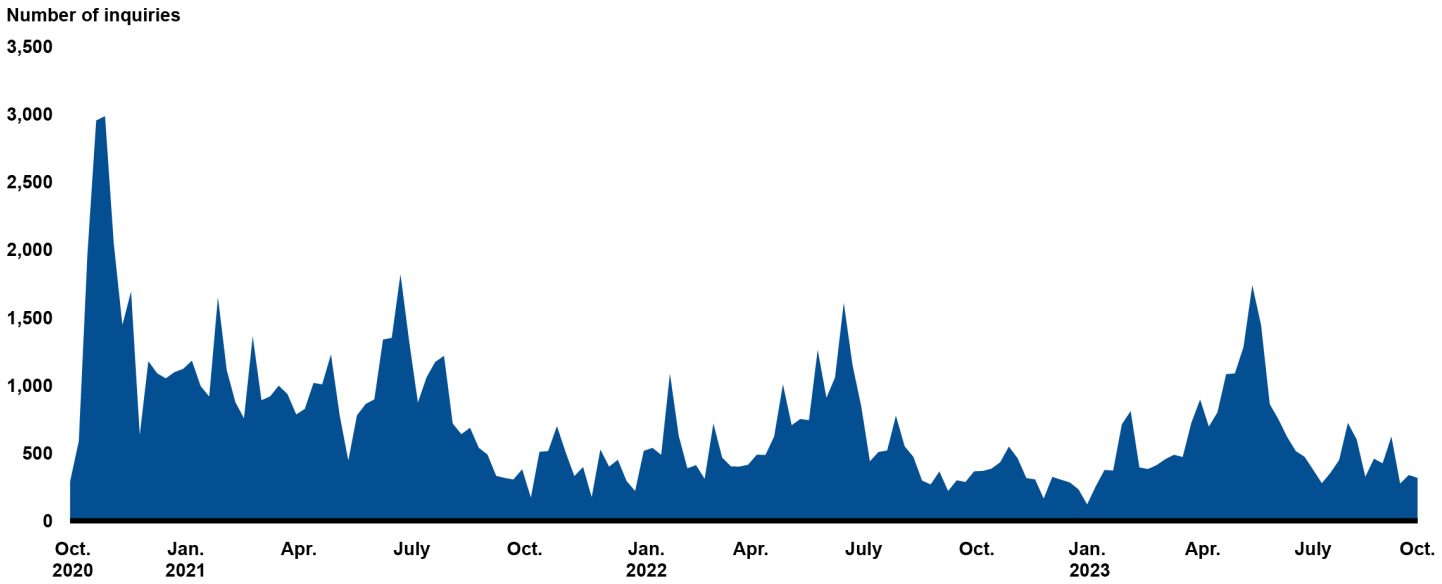
In fiscal year 2022, the help desk received about 28,900 inquiries from external users, a 48 percent decrease from fiscal year 2021's 55,800 inquiries. In fiscal year 2023, the OJP help desk received about 28,200 inquiries from external users—approximately the same number as the prior year.[30] OJP officials told us that the number of inquiries to the help desk fluctuates with grant management life cycle deadlines, as shown in figure 4.

[28]About 45 percent of the inquiries related to entity and user management issues are requests for passwords to be reset in fiscal years 2021 through 2023.

[29]The purpose of a Grant Award Modification is to update award details or modify key facts or details about the award. Recipients of federal funds are required to submit quarterly Federal Financial Reports. The Federal Financial Report is a standard form used to report cumulative expenses incurred under each grant number.

[30]The number of JustGrants users reported by DOJ went up from about 19,000 in 2020 to about 68,000 in 2023, as the number of inquiries to the JustGrants help desk generally decreased over the same period.

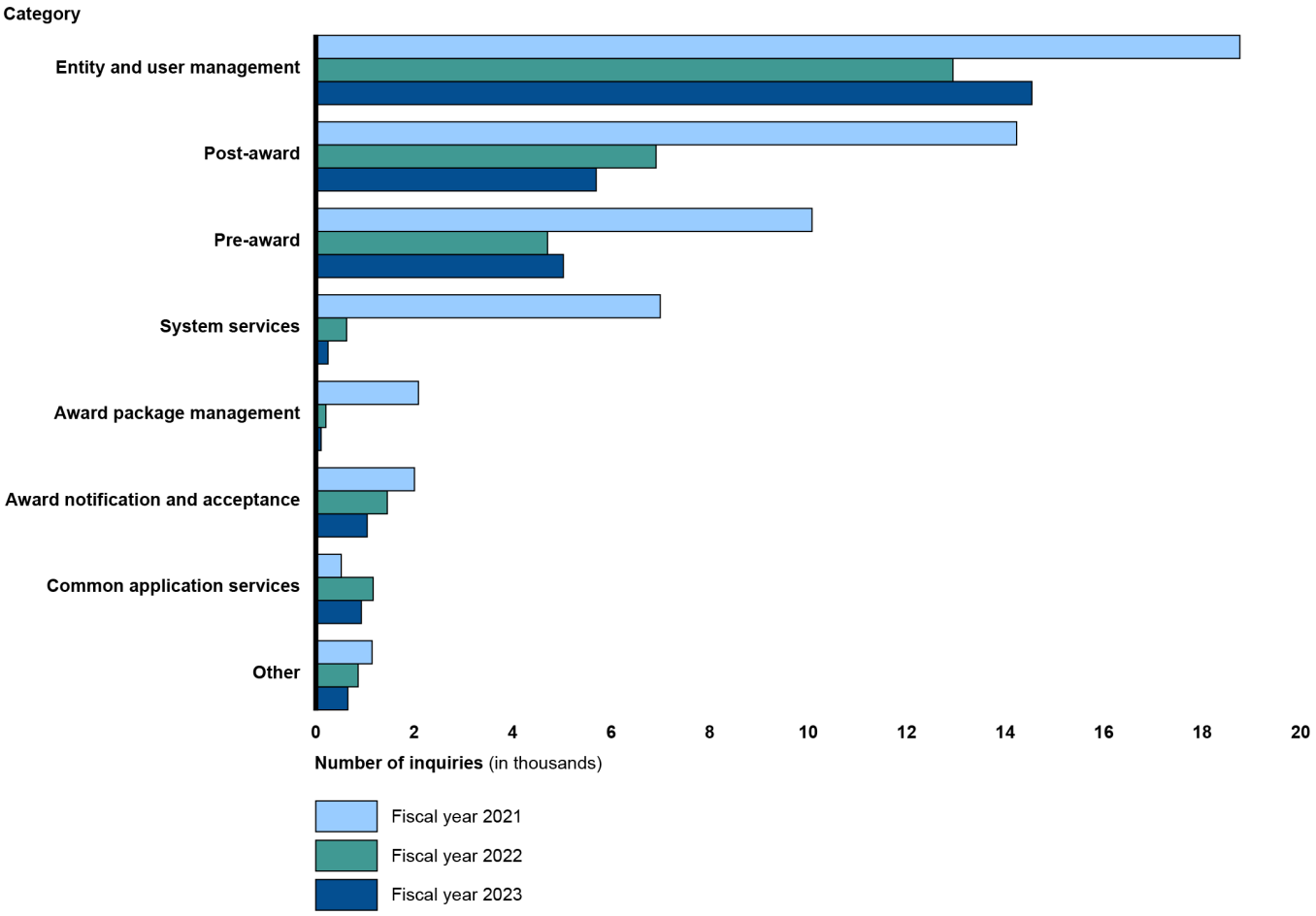
Figure 4: Inquiries from External Users to the JustGrants Help Desk by Week (October 2020 through September 2023)



Source: GAO analysis of Department of Justice data. | GAO-24-106501

This marked decrease may indicate that, while external users continue to contact the service desk with questions, requests for technical assistance, or issues applying for and managing grants in JustGrants, these users had significantly fewer problems in 2022 and 2023 than in 2021. This conclusion is consistent with our interviews with two Tribes and one training and technical assistance provider which indicated that their challenges with JustGrants in 2022 and 2023 were generally fewer in number and less severe. The volume of inquiries decreased between fiscal years 2021 and 2022—and generally continued into fiscal year 2023—in most of the areas that external users need to apply for and manage award opportunities, as shown in figure 5. According to OJP officials, the numbers of service desk contacts in 2022 and 2023 are roughly equivalent to the levels of contact for the legacy grants management system used by OJP and OVW.

Figure 5: Number of Inquiries from External Users to the JustGrants Help Desk by Fiscal Year and Category, Fiscal years 2021 through 2023



Source: GAO analysis of Department of Justice data. | GAO-24-106501

In each fiscal year, the largest category of inquiries to the help desk related to entity and user management issues. For example, the assignment of roles in JustGrants was a confusing process for many applicants, according to a nonprofit membership organization of 19 tribal coalitions that participated at a DOJ Tribal consultation in August 2021. DOJ sent numerous communications with training materials on roles and gaining access to JustGrants. However, when grantees set up their JustGrants account, some reported they were not always aware of the various roles, responsibilities, and privileges for each role. As a result, grantees experienced issues in accessing, completing, and submitting financial status reports and grant applications.

Staff turnover within a grantee's organization may also affect entity and user management. For example, the OJP help desk may receive requests for assistance related to password resets, because of staff turnover and organizational transitions, which can cause JustGrants password issues and delays in the application submission and grant management processes. Similarly, if a grantee administrator (an entity's user that manages all of the users for an organization) leaves the organization but does not reassign that role, then that grantee cannot manage its user role assignments. In fiscal year 2021, the help desk received about 18,800 inquiries in this category. In fiscal years 2022 and 2023, the number of inquiries had dropped to about 12,900 and 14,500, respectively.

The number of pre-award inquiries decreased from about 10,100 in fiscal year 2021 to about 4,700 in fiscal year 2022 and 5,000 in fiscal year 2023. In fiscal year 2021, OJP received over 14,200 post-award inquiries, while in fiscal years 2022 and 2023, OJP received approximately 6,900 and 5,700 inquiries in that category, respectively.

The number of inquiries related to system services, which included issues with training, site availability, and system navigation, also dropped. OJP received about 7,000 inquiries in this category in fiscal year 2021 and only about 600 in fiscal year 2022 and 300 in fiscal year 2023.

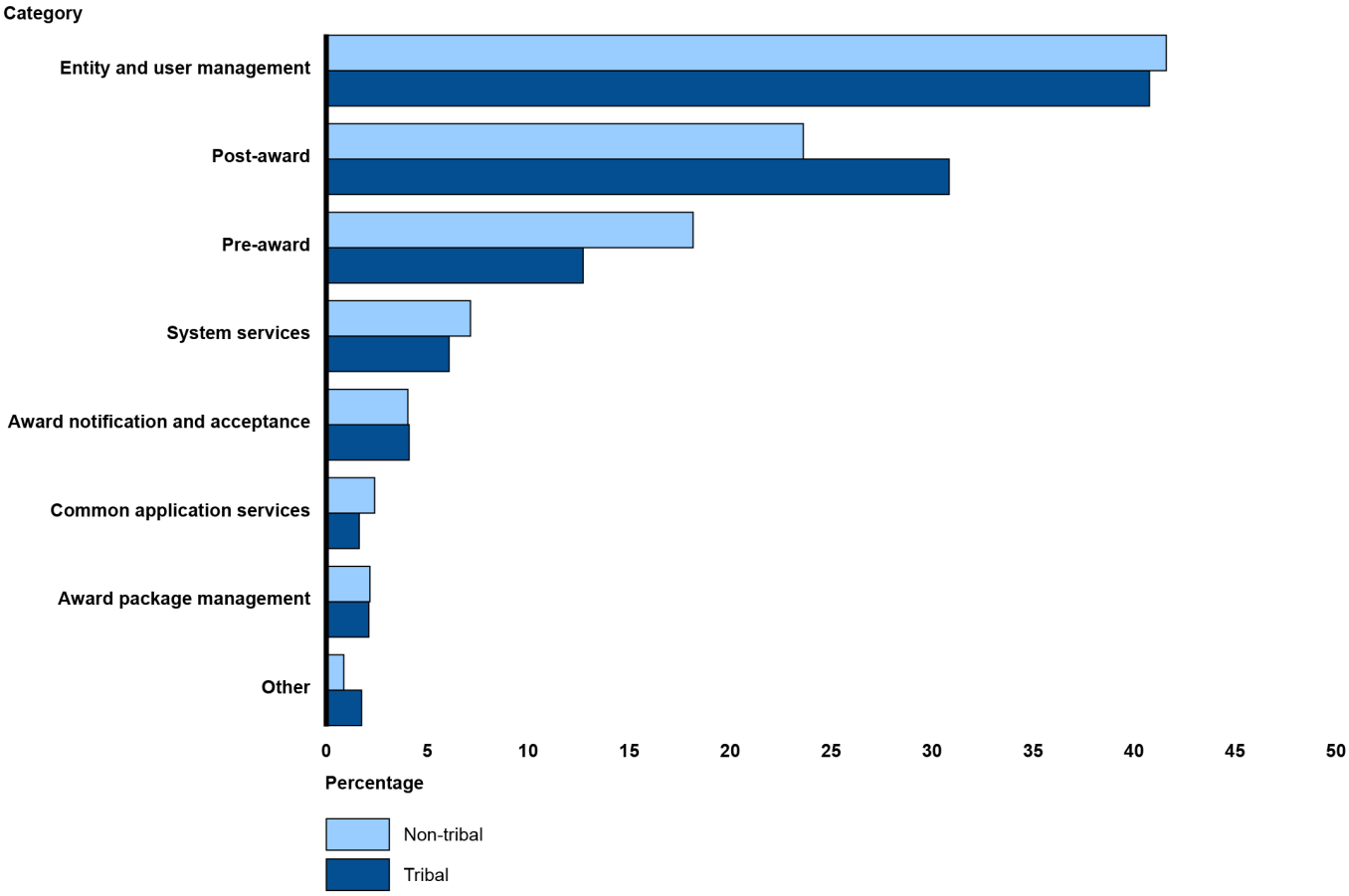
Available Data Indicate that Tribal Grantees' Experiences Were Generally Similar to Experiences for All JustGrants External Users

From October 2020 through September 2023, DOJ help desk data we reviewed showed tribal and non-tribal entities had similar rates of inquiries for most categories.

According to the help desk data, tribal users make up about 6.9 percent of the JustGrants user base, as of February 2023, and reported about 6.6 percent of the issues from October 2020 to September 2023. Also, according to the help desk data, tribal users submitted inquiries to the JustGrants help desk at approximately the same rates as non-tribal users. For example, 3,056 of 7,495 inquiries, or about 41 percent, from tribal users across these years, and 43,188 of 105,446 inquiries, about 41 percent, from non-tribal users were related to entity and user management issues. In addition, the questions and challenges tribal users reported were not more severe than non-tribal users' questions and challenges, according to our analysis of the help desk data. Specifically, in fiscal years 2021 through 2023, the help desk personnel initially assigned to the issue resolved about 86 percent of inquiries from tribal users and about 86 percent of inquiries from non-tribal users. For each subgroup, 14 percent of calls were escalated to other personnel to

investigate the issue. Figure 6 shows the distribution of help desk inquiries among tribal and non-tribal users.

Figure 6: Comparison of Most Reported Categories of Inquiries to JustGrants Helpdesk as Percentage of Total Issues for Tribal versus Non-Tribal Users for Fiscal Years 2021 Through 2023



Source: GAO analysis of Department of Justice data. | GAO-24-106501

Note: Inquiries related to entity and user management issues refer to users' ability to access JustGrants and shared systems, including requests for password resets, which make up about 45 percent of all entity and user management inquiries over this time period. Pre-award inquiries refer to issues or questions about, among other things, grant solicitations and application submission. Post-award inquiries refer to issues or questions about grant modifications and financial reporting, among other topics. Inquiries related to common application services include issues with document attachments and system notifications.

Challenges Frequently Reported by Tribal JustGrants Users

Tribal grantees are often located in remote areas with poor internet service, operate with limited staff resources, and have high rates of staff turnover. These and other related challenges were reported by Tribal

representatives attending OVW annual tribal consultations[31] and DOJ listening sessions,[32] as well as by tribal grantees we interviewed.[33]

Table 1 lists examples of challenges tribal grantees and training and technical assistance providers have had with JustGrants.

Table 1: Examples of Challenges Related to JustGrants Reported by Tribal Entities

Challenge	Description
Grant Award Modifications	Difficulty navigating and completing Grant Award Modifications in the JustGrants system, often requiring assistance from the JustGrants help desk. The purpose of a Grant Award Modification is to update award details, modifying key facts or details about the award.
Training	Training materials are too voluminous, and webinars present too much information with not enough time to digest the information. In addition, training guidance did not always match the actual steps needed to use JustGrants.
Internet and JustGrants connectivity	Lack of internet connectivity in rural areas, JustGrants timing out, and general system slowness.
Uploading documents	As a result of connectivity issues, tribal users also had trouble uploading documents to the system, such as budgets and financial reports.
Staff resource limitations	Tribes, as with other entities, may experience staff turnover, which can disrupt access to JustGrants if not planned for in advance. In addition, tribal governments may have limited staff and addressing the challenges caused by JustGrants may be a bigger burden.
JustGrants help desk	Long wait and response times when contacting the JustGrants help desk, insufficient availability of JustGrants help desk support across times zones and help desk staff's lack of knowledge of grant applications.

Source: GAO analysis of information from the Department of Justice and GAO interviews with tribal entities. | GAO-24-106501

OJP Took Steps to Mitigate Identified Issues with JustGrants

Since JustGrants went live in 2020, OJP has been working to develop technical features and fixes to increase the functionality of the system and reduce issues that affected users' abilities to use the system. According to a consultant that OJP engaged in August 2021 to assess program

[31]OVW conducts an annual consultation with Indian tribal governments concerning the administration of tribal funds and programs established under the Violence Against Women Act and its reauthorizations. See Violence Against Women and Department of Justice Reauthorization Act of 2005, Pub. L. No. 109-162, tit. IX, § 903, 119 Stat. 2960, 3078 (codified as amended at 34 U.S.C. § 20126). Since 2020, tribal grantees have expressed concerns with JustGrants at the annual consultations.

[32]The COPS Office facilitated a listening session in September 2022, and the DOJ Coordinated Tribal Assistance Solicitation team held a listening session in December 2022. In both listening sessions, Tribes raised issues with JustGrants.

[33]To discuss challenges with JustGrants and related perspectives, we conducted semi-structured interviews with officials from four federally recognized Tribes, one tribal organization, and two providers that provide training and technical assistance to Tribes. The perspectives that these entities offered are not generalizable, but they provide insights into issues that some JustGrants users encountered.

deficiencies and recommend remedies, OJP implemented fixes for over 1,000 code quality issues of the highest severity level—referred to as "showstopper" bugs—released into the production system between November 2020 and August 2021. In addition, as of August 2023, OJP implemented 89 of the 90 actionable recommendations made in the consultant's January 2022 report, according to DOJ officials.[34] The recommendations covered a variety of topics, including process and planning, testing and quality assurance, and technology and application architecture.

OJP also has been working to develop technical features and fixes to address concerns raised by external users. OJP officials told us that they review data on calls to the OJP help desk and identify common issues faced by JustGrants users. OJP translates these themes into requirements, and OJP development teams work to develop and deploy solutions. For example, OJP observed that "validation errors," which were designed to help users identify where there were errors in their applications, were confusing users. As a result, OJP released an update to JustGrants in June 2022 that helped clarify flagged errors, including using a red asterisk to denote a required field.

OJP officials also told us that DOJ has processes that allow applicants to request alternative methods for submission or late submission of applications due to technical issues beyond the applicant's control. For example, an applicant to the Coordinated Tribal Assistance Solicitation who experiences technical difficulties with JustGrants can submit an application by email, provided they notify OJP and email key application documents before the solicitation deadline.

In addition, OJP officials noted they continue to reach out to and educate external users to improve their ability to use JustGrants. For example, as of September 2023, OJP has added new instructional videos to the JustGrants website and updated reference documents to help external users learn how to use JustGrants. As another example, problems with the transition to JustGrants may have prevented grantees from accessing DOJ funds, as first reported by the DOJ Office of the Inspector General in

[34]The Clearing, Inc., *JustGrants Program Review*. The Clearing, Inc. made 140 recommendations in its January 2022 report. OJP told us that they merged 41 of those recommendations with closely related recommendations, dropped three duplicative recommendations, and rejected six recommendations following reviews by technical, business, and leadership staff. Officials said that these six recommendations did not align with stated goals, processes, or objectives of DOJ. According to OJP officials, the outstanding recommendation is related to system testing.

May 2021.[35] According to OJP, challenges that some grantees initially faced accessing funds were generally because the grantees were not properly enrolled in Automated Standard Application for Payments, the Department of the Treasury system that grantees must access to drawdown their awards. To address this challenge, OJP officials also said that they stood up a team that focused on ensuring that grantees took the steps necessary to enroll in Automated Standard Application for Payments. This team reached out by email and phone to entities that had not yet enrolled in Automated Standard Application for Payments.

Engagement with External Users Generally Aligned with Organizational Change Management Leading Practices but Shortcomings Remain

DOJ Established a Change Management Program Around the Time it Started to Develop JustGrants

OJP undertook an organizational change management approach beginning in 2017 to facilitate the transition to JustGrants, as it considered ways to reimagine its business processes. According to OJP officials involved in the change management process, the agency used a contractor to provide expertise on how to manage the changes experienced by DOJ staff and external stakeholders from the migration to a new grant management system.

Working with an organizational change management contractor, OJP developed an organizational change management strategy and communications plan that covered the transitions to JustGrants, the Unified Financial Management System, and the Department of the Treasury's Automated Standard Application for Payments. By early 2018, a working group composed of subject matter experts from OJP and OVW was established to manage the change management program, OJP

[35]Department of Justice, Office of the Inspector General, *JustGrants Transition Impacting DOJ Awardees' Ability to Access Funds and Manage Award Activities*, Issue Alert 21-069 (Washington, D.C.: May 6, 2021).

officials noted. Subject matter experts from the COPS Office joined this working group in May 2018, according to COPS Office officials.

The goals of the OJP enterprise-wide change initiative were to (1) inform OJP staff about the change and why the change was happening, (2) educate internal and external stakeholders about how the change initiatives will affect them and how they will need to adapt in the future, and (3) engage stakeholders involved in the change so that OJP could incorporate their perspectives. DOJ internal stakeholders included grant and program managers and finance and acquisition staff. External stakeholders included current DOJ grantees and applicants.

The transformation process involved three distinct phases. First, the innovation phase included establishing a vision for the change and re-envisioning business processes. The second phase, the agile phase, involved conducting market research and developing the system. Lastly, the implementation phase included creating informational and training materials and engaging with internal and external stakeholders.

DOJ Followed Most of the Leading Practices for Organizational Change Management

OJP followed five of the seven leading practices for organizational change management that we identified. See table 2.

Table 2: Implementation of Selected Leading Practices for Organizational Change Management for JustGrants Development by the Department of Justice (DOJ)

Selected leading practice	Practice implemented
Develop a comprehensive understanding of who its current and future customers are and what their needs and expectations are (understanding customers)	●
Develop a stakeholder engagement strategy to build support among customers and external stakeholders	◐
Develop a communications plan	●
Communicate early and regularly with stakeholders, providing targeted, carefully planned, and compelling messages	●
Develop and deliver training	●
Establish performance goals and collect performance data and feedback	◐
Use performance data and feedback to make refinements to work processes, as needed	●

Legend:
● = DOJ activities fully aligned with the leading practice
◐ = DOJ activities partially aligned with the leading practice

Source: GAO analysis of DOJ information. | GAO-24-106501

Understanding customers. OJP implemented this leading practice. According to officials, OJP focused on the innovation and gathering of stakeholder and user information regarding DOJ's grant-related business practices and capabilities for 2 years prior to launching JustGrants. As part of this process, called the JustGrants Innovation Initiative, in 2018, OJP held an innovation session with select grant recipients to learn about their past experiences with OJP and how the new grant system could be designed. This innovation phase focused on gathering stakeholder and user ideas around business processes and capabilities.

Stakeholder engagement strategy. OJP partially implemented this leading practice. The agency planned for and conducted engagement with external stakeholders, but we could not confirm that OJP documented a stakeholder engagement strategy or a stakeholder analysis, which is an important part of developing a stakeholder engagement strategy.

OJP officials told us that the agency's stakeholder engagement process involved the production of hundreds of documents over several years. As early as February 2018, OJP developed processes to communicate with and solicit input from external stakeholders on the change to a new grant management system. The Integrated Communications and Change Management Plan, developed in 2019, laid out OJP's plan for communicating with stakeholders about the upcoming transition and identified the frequency for communicating with each group of stakeholders. For example, the plan stated that OJP would communicate with grantees through the OJP website at major development milestones and would email them prior to the beginning of the annual grant application cycle.

However, OJP officials stated that they did not develop the stakeholder analysis and the stakeholder engagement strategy as distinct documents because other documents that the agency produced analyzed stakeholders' perspectives instead. They said that, even though a stakeholder analysis was not formalized as a standalone document, they developed an overall direction and approach for stakeholder engagement.

Even though OJP officials stated that they developed an overall approach for stakeholder engagement, we could not confirm that OJP conducted and documented two key activities of stakeholder engagement planning: stakeholder analysis and the stakeholder engagement strategy. Documents we reviewed do not fulfill the purpose of a stakeholder engagement strategy, which is to identify an approach to ensure that

individuals or groups impacted by a change are engaged in the change effort.[36] For example, none of the documents that OJP provided discussed the prioritization of key stakeholders or refer to a stakeholder analysis.

Documents we reviewed also did not include key elements of a stakeholder analysis. A stakeholder analysis, according to Project Management Institute's *Managing Change in Organizations: A Practice Guide*, is a "technique of systematically gathering and analyzing […] information to determine whose interests should be considered throughout the project." It should identify stakeholders' communication needs and risks associated with not meeting these needs, according to *Managing Change in Organizations*.[37] We could not confirm that OJP conducted such an assessment.

Managing Change in Organizations notes that it is important to create and regularly update planning documents. Similarly, *Standards for Internal Control in the Federal Government* state that documentation is required for the effective design, implementation, and operating effectiveness of an entity's internal control system.[38] By developing and documenting the stakeholder analysis and the stakeholder engagement strategy, OJP officials would have been better able to ensure that individuals and groups impacted by the change were engaged in the change effort. Because successful stakeholder engagement can affect the outcome of the proposed change, it is important that OJP establish and document an approach to ensure that key organizational change management steps are completed in future efforts.

Communications plan. OJP implemented this leading practice. As described above, the Integrated Communications and Change Management Plan laid out OJP's plan for communicating with stakeholders about the transition to the new grant management system.[39] The plan highlighted key messaging topics—including the what, why,

[36]The Association of Change Management Professionals, *Standard for Change Management*© and *ACMP Change Management Code of Ethics*, First Edition.

[37]The Project Management Institute, Inc., *Managing Change in Organizations: A Practice Guide* (2013).

[38]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 10, 2014).

[39]The plan also details communication plans related to the transition to the Unified Financial Management System.

how, and who that the change to the new grant management system will affect—and identified how frequently and through what channels OJP will communicate with specific groups of stakeholders.

Communicate early and regularly with stakeholders. OJP implemented this leading practice. Beginning in June 2020, OJP communicated with grantees about the upcoming transition to the new system primarily via email. According to OJP officials, the agency contacted grantees of all DOJ grant components: OJP, OVW, and COPS Office. OJP officials told us that they decided to begin notifying grantees in June 2020—approximately 4 months before JustGrants went live—because grantees had to continue to manage their ongoing grants in Grant Management System and NexGen, the predecessor systems. Between June and October 2020 when JustGrants went live, OJP sent 16 emails to grantees that notified grantees about the new grant system and related systems, alerted them to training opportunities, and informed them about steps they should take in advance of the transition. From the launch of JustGrants until the end of fiscal year 2021, OJP sent an additional 22 notices to grantees. All of these notices were also posted on the JustGrants internet site.

Develop and deliver training. OJP implemented this leading practice. The JustGrants User Education Team developed extensive training resources for DOJ's external website, including job aids, videos, and checklists for steps in the grant management process. Some of these resources were available during the first months that JustGrants was operational. For example, as of September 2020, external users had access to 10 training videos on the JustGrants internet site, including videos related to entity management, grantee award acceptance, and financial reporting. In September and October 2020, OJP held nine virtual question and answer sessions for external JustGrants users on similar topics.

As the implementation of JustGrants continued, the User Education Team developed additional training resources, such as reference guides for various steps in the grant cycle and posted them on the JustGrants external website. As of December 2023, OJP has continued to hold multiple weekly virtual question and answer sessions for external users on various topics, such as award acceptance and post-award management. In addition, the Coordinated Tribal Assistance Solicitation team holds an annual webinar that addresses questions related to JustGrants, among other topics, for prospective applicants.

Establish performance goals and collect performance data. While OJP collected performance data, we found that OJP's performance goals for its organization change management program were not quantifiable and did not include a mix of intermediate and ultimate performance goals.

OJP collected information from myriad sources about how the transition to JustGrants progressed. One of the primary mechanisms for collecting performance information was from the OJP help desk. OJP collects and analyzes data from the help desk to identify trends or issues with JustGrants that it needs to address. Agency officials told us that they also tracked the volume of calls to the OJP Response Center—which serves as a point of contact for grant applicants—as well as the number of applications submitted, and the number of awards obligated by the end of each fiscal year.

OJP also used other mechanisms to collect performance information on its transition to JustGrants, some of which pertain only to Tribes and tribal organizations. For example, the annual Coordinated Tribal Assistance Solicitation Assessment is a survey conducted after the Coordinated Tribal Assistance Solicitation that asks Tribes and tribal organizations about additional support that could be provided to future applicants of the solicitation. The DOJ Coordinated Tribal Assistance Solicitation team also held a listening session in December 2022 with representatives from 15 Tribes to identify what is working well with the solicitation, gaps and barriers to the grant application and grant management process, and recommendations to address gaps and barriers. OJP also collects user feedback in virtual question and answer sessions for external users and from OJP, OVW, and COPS grant managers who receive feedback directly from grantees, according to DOJ officials.

OJP developed performance goals in four different change management areas: communication and engagement; system readiness; policy, process, and procedure; and user training and support. For example, the goal for communication and engagement was for users to be satisfied that they were provided with opportunities to be engaged and informed on the change effort. The goals of user training and support were to ensure sufficient instructional opportunities were available to meet end users' needs and to create a reliable intake process for users to request assistance. Although these performance goals identified desired outcomes, they were not quantifiable and were not a mixture of intermediate goals and ultimate performance goals for the organizational change management process. OJP had ultimate performance goals but did not have intermediate performance goals as well.

One of the leading practices for organizational change management we identified is that organizations should establish performance goals and collect performance data and feedback for its organizational change management program. Performance goals are the specific results an agency expects its program to achieve in a defined period of time and should be objective, measurable, and quantifiable.[40]

According to our prior work on business process reengineering, performance goals for the reengineered process should include a mixture of intermediate goals to be met at various stages during the implementation phase, as well as ultimate performance goals for the process after it has been fully implemented and institutionalized.[41] Similarly, the Association of Change Management Professionals® Standard for Change Management states that "change objectives and goals should be used to determine what is required to achieve the future state. These targets should be specific and quantifiable for the organization to understand what is expected."[42]

Establishing and documenting an approach to ensure that future organizational change management programs related to grants management develop objective, measurable, and quantifiable performance goals as well as intermediate and ultimate performance goals would help OJP to assess the progress of future programs. For example, OJP could have developed performance goals related to the number of entities enrolled in JustGrants or the number of applications submitted to better determine how effectively the system was working at specified points during the implementation phase. These performance goals would have allowed OJP to track the progress of its organizational change management program and make necessary adjustments.

Use performance data and feedback. OJP implemented this leading practice. As described above, OJP established processes to take

[40]For goals to be considered objective, they should be reasonably free of any significant bias or manipulation that would distort the accurate assessment of performance. To the greatest extent possible, the goals and measures should not require subjective considerations or judgments to dominate the measurement. The performance goals and measures usually should include a quantifiable, numerical target level or other measurable value. See GAO, *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans*, GAO/GGD-10.1.20 (Washington, D.C.: April 1, 1998).

[41]GAO/AIMD-10.1.15.

[42]The Association of Change Management Professionals, *Standard for Change Management*© and *ACMP Change Management Code of Ethics* (2019).

performance and user feedback and use that information to improve JustGrants. For example, according to OJP officials, the Coordinated Tribal Assistance Solicitation team used the questions it received from applicants to brief the JustGrants help desk and technical teams on the types of questions they may receive and how best to respond to them. As another example, OJP officials told us they fielded a significant number of questions from applicants about whether more than one individual could work on a given application in JustGrants. In 2022, OJP developed an improvement to JustGrants that allowed external entities to assign up to three "Application Submitters" that could each work on an application at the same time.

Conclusions

DOJ provided about $5.7 billion in grants and cooperative agreements to tribal jurisdictions, state and local jurisdictions, and for-profit and nonprofit organizations in fiscal year 2023. In fiscal year 2021, DOJ officials undertook a large and significant effort to improve their grants management systems. Aware that the transition to a new grant management system was a significant change for internal and external users, OJP undertook an organizational change management program, beginning in 2017 and continuing through JustGrants going live in October 2020. Through principles of organizational change management that centered on stakeholder communication and education, OJP sought to facilitate internal and external users' transition from the legacy systems to JustGrants.

OJP's organizational change management practices generally aligned with the leading practices that we identified. However, there were two areas in which OJP could have more effectively executed the organizational change management approach. First, OJP did not develop or document all of the key stakeholder engagement planning activities. By ensuring that key steps were developed and documented, OJP could have made certain that the agency was best positioned to successfully execute the organizational change management program. Second, OJP did not establish quantitative and intermediate performance goals for the organizational change management program. By including quantitative and intermediate performance goals, OJP would have been able to more easily track and assess how its organizational change management program was progressing and modify the approach, if needed, to better communicate with stakeholders and facilitate this significant change for its users. By establishing and documenting an approach to ensure that its future organizational change management programs incorporate leading practices, OJP's modernization efforts will be best positioned to succeed.

Recommendations for Executive Action

We are making three recommendations to the Department of Justice:

The Assistant Attorney General for the Office of Justice Programs should establish and document an approach to ensure that future organizational change management programs related to grants management include a stakeholder engagement strategy, a key element of stakeholder engagement planning. (Recommendation 1)

The Assistant Attorney General for the Office of Justice Programs should establish and document an approach to ensure that future organizational change management programs related to grants management include a stakeholder analysis, a key element of stakeholder engagement planning. (Recommendation 2)

The Assistant Attorney General for the Office of Justice Programs should establish and document an approach to ensure that future organizational change management programs related to grant management develop performance goals that are objective, measurable, and quantifiable and include a mix of intermediate and ultimate performance goals. (Recommendation 3)

Agency Comments and Our Evaluation

We provided a draft of this report to DOJ for review and comment. In its comments, DOJ concurred with all three recommendations, as reprinted in appendix II. DOJ also provided technical comments that we incorporated, as appropriate.

We are sending copies of this report to the appropriate congressional committees and the Attorney General, and other interested parties. In addition, the report will be available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions on the matters discussed in this report, please contact me at (202) 512-8777 or at goodwing@gao.gov. Contact points for our Offices of Congressional Relations and Public

Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

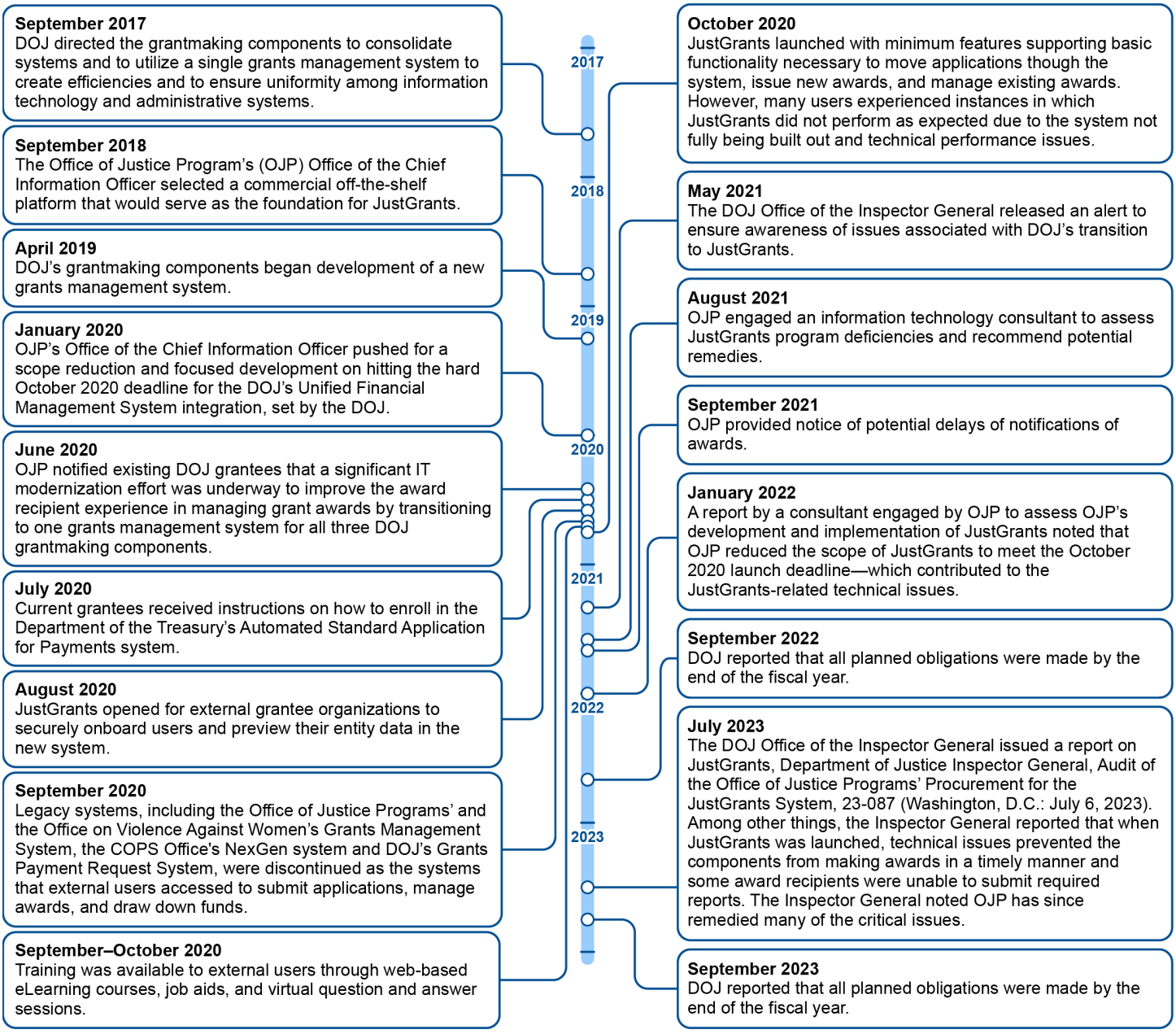
Sincerely,

Gretta L. Goodwin
Director, Homeland Security and Justice

Appendix I: Timeline of Selected Events Related to JustGrants

Figure 7 illustrates key events related to the development of JustGrants from September 2017 to September 2023.

Figure 7: Timeline of Selected Events Related to JustGrants



Source: GAO analysis of Department of Justice (DOJ) information. | GAO-24-106501

Appendix II: Comments from the Department of Justice

U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

April 24, 2024

Ms. Gretta Goodwin
Director
Homeland Security and Justice
Government Accountability Office
441 G Street, NW
Washington, DC 20548
VIA Electronic Mail at GoodwinG@gao.gov

Dear Ms. Goodwin:

Thank you for the opportunity to review and comment on the draft Government Accountability Office (GAO) report entitled, *DOJ Grants Management: Further Steps Could Improve Efforts Taken to Address Early Grants IT Modernization Challenges (GAO-24-106501).*

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 consolidated grants management system (JustGrants) 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 currently supports over 46,000 users managing over 21,000 awards totaling over $24 billion.

Since the launch of JustGrants in 2020, OJP's Office of the Chief Information Officer, in partnership with the OJP program and business offices, the COPS Office, and OVW, has implemented significant efforts to improve the operations of JustGrants development efforts and the quality of the JustGrants system. OJP continuously monitors user feedback to identify updates for resources and user guides, training opportunities, and strategic communication to applicants and award recipients. As GAO highlights in the report, as a result of the program and system improvements, the overall volume and types of inquiries to the JustGrants help desk for external users declined from 48% between 2021 to 2023.

As described in the report, OJP implemented a change management effort, which GAO acknowledges generally aligned with the leading practices. We appreciate GAO's acknowledgement of OJP's efforts to understand our users, plan and implement a communications strategy, develop and deliver training, and monitor performance data and feedback to improve JustGrants. While OJP did not develop distinct standalone documents on stakeholder engagement strategy and stakeholder analysis, OJP provided GAO with numerous documents that together framed its engagement strategy. OJP's success in implementing change

management efforts demonstrates that OJP effectively communicated its overall direction and approach for stakeholder engagement and considered its stakeholders.

GAO acknowledged that OJP developed performance goals in four different change management areas: communication and engagement; system readiness; policy, process, and procedure; and user training and support. However, GAO concluded that, although the performance goals identified desired outcomes, they were not quantifiable and were not a mixture of intermediate goals and ultimate performance goals for the organizational change management process. As discussed with GAO during the review, the stakeholders and risks were widely known and understood by OJP. Specifically, OJP determined that delays or barriers to processing applications, making awards, or accessing funds were major risks and removing barriers was the highest priority.

Throughout the course of the development and rollout of the JustGrants system, OJP routinely tracked metrics and progress toward achieving desired outcomes and used this data to determine necessary actions to remediate potential risks as they were identified. For example, months prior to rollout, DOJ established metrics to track completion rates for both JustGrants and Automated Standard Application for Payments enrollment as these actions were necessary to access the system and award funding. To increase enrollment rates, OJP contacted grantees individually to provide technical assistance with onboarding and continued this effort until all grantees were enrolled.

The draft GAO report contains three Recommendations for Executive Action directed to the Department of Justice, Office of Justice Programs. For ease of review, the recommendations directed to OJP are restated below and followed by our response.

1. **The Assistant Attorney General for the Office of Justice Programs should establish and document an approach to ensure that future organizational change management programs related to grants management include a stakeholder engagement strategy, a key element of stakeholder engagement planning.**

   The Office of Justice Programs accepts this recommendation. OJP will ensure that future change management programs related to grants management will include a documented stakeholder engagement strategy.

2. **The Assistant Attorney General for the Office of Justice Programs should establish and document an approach to ensure that future organizational change management programs related to grants management include a stakeholder analysis, a key element of stakeholder engagement planning.**

   The Office of Justice Programs accepts this recommendation. OJP will ensure that future change management programs related to grants management will include a documented stakeholder analysis.

3. **The Assistant Attorney General for the Office of Justice Programs should establish and document an approach to ensure that future organizational change management programs related to grant management develop performance goals**

that are objective, measurable, and quantifiable and include a mix of intermediate and ultimate performance goals.

The Office of Justice Programs accepts this recommendation. OJP will ensure that future change management programs related to grants management will include documented performance goals that are objective, measurable, and quantifiable and include a mix of intermediate and ultimate performance goals.

If you have any questions regarding this response, you or your staff may contact Jeffery A. Haley, Deputy Director, Office of Audit, Assessment, and Management, at (202) 616-2936.

Sincerely,

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