



Financial Management

T R A I N I N G

*BJA's Body-Worn Camera Training and Technical Assistance
2023 National Meeting - Virtual*

Office of the
Chief Financial Officer

Office of Justice Programs

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Program Requirements Applicable to Some Federal Grants



Cash vs. In-Kind Matching



VS.





How to Calculate Match

$$\frac{\text{Award Amount}}{\% \text{ of Federal Share}} = \text{Adjusted Project Cost}$$

$$\text{Adjusted Project Cost} \times \text{Recipient's Share} = \text{Required Match}$$

Ex: Federal Amount = \$80,000 with 80/20 Match

$$\frac{\$80,000}{80\%} = \$100,000 \text{ Adjusted Project Cost}$$

$$\$100,000 \times 20\% = \$20,000 \text{ Required Match}$$

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Procurement Procedures General Guidance



Procurement Procedures and General Guidance

- State and non-Federal entities should follow their own policies and procedures.
- If State or non-Federal entities procedures offer more efficient protection for the Federal Dollar use them—IF NOT USE THE FEDERAL.

- **Documentation is very important!**

Contract files must establish an audit trail.

Documentation should be sufficient enough to stand on its own.





General Guidance and Competition

- 2 CFR Part 200.319 requires all procurement transactions be conducted in a manner that provides full and open competition.
- Bidders' lists should be continually updated.
- Newspaper/other advertising of contract requirement is very important.
- Procurement transaction must be conducted in a manner that prohibits local preference laws.
- Local preference should only be used when authorized by Federal statute.





Sole Source Contract

Federal awarding agency's approval of sole source is required for procurements over \$250K.

Use when:

- The item or service is available only from a single source.
- A true public exigency or emergency exists.
- After competitive solicitation, competition is considered inadequate.



Sole Source Contract

Noncompetitive Procurement

- What is “noncompetitive/sole source” procurement?
 - Procurement by noncompetitive proposals
 - Must adhere to the standards set forth in *Title 2 CFR 200.320(c)*
- When is sole source approval required by OJP?
 - A recipient determines that the award of a contract through a competitive process is infeasible.
 - Simplified Acquisition Threshold > \$250K
- What documentation must be submitted to OJP for sole source approval?
 - *Noncompetitive/Sole Source Approval Grant Award Modification (GAM)* in the Office of Justice Programs (OJP) JustGrants System



Sole Source Contract

Common federal administrative requirements that apply to all (or virtually all) subawards of OJP awards.

OJP resources on related topics and for additional information please refer to:

<https://ojp.gov/training/pdfs/Subaward-Procure-Toolkit-D.pdf>



Sole Source Contract

What is sole source review checklist?

- A tool to assess the merits of a sole source approval request

For additional information, please refer to the Sole Source Justification Fact Sheet:

<https://ojp.gov/training/pdfs/Sole-Source-FactSheet-C.pdf>



Sole Source Justification/Sample Outline

| Paragraph | Content |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Brief description of program and what product or service is being contracted for: |
| 2 | Explanation of why it is necessary to contract non-competitively, to include: <ul style="list-style-type: none">• Organizational expertise• Management• Knowledge of the program• Responsiveness• Expertise of personnel |



Sole Source Justification/Sample Outline

| Paragraph | Content |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | Description of and the results of any market survey or research conducted. If no survey or research conducted, explain why not. |
| 4 | Statement of when contractual coverage is required and if dates are not met, what impact on the program. Example: how long it would take another contractor to reach the same level of competence (equate in \$\$). |



Sole Source Justification/Sample Outline

| Paragraph | Content |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5 | Other points to “sell the case.” |
| 6 | A declaration that this action is in the “best interest” of the grantor agency and/or the Federal government. |
| 7 | Conflict of Interest review. |
| Note: | Time constraints will not be considered a factor if the grantee has not sought competitive bids in a timely manner thereby creating a time constraint situation. |



Contracting Dos & Don'ts

DOs

- ✓ Compete
- ✓ Prepare IFB/RFP
- ✓ Maintain bidders list
- ✓ Conduct interviews
- ✓ Obtain prior approval
- ✓ Make documentation available

DON'Ts

- × Place unreasonable requirements
- × Require unnecessary experience
- × Engage in noncompetitive pricing
- × Engage in organizational conflicts of interest
- × Require unreasonable timeframe



List of Parties

Excluded From Federal Procurement or Non-Procurement Programs

?

Frequently Asked Questions:

Electronic List of Parties

<http://www.sam.gov/>

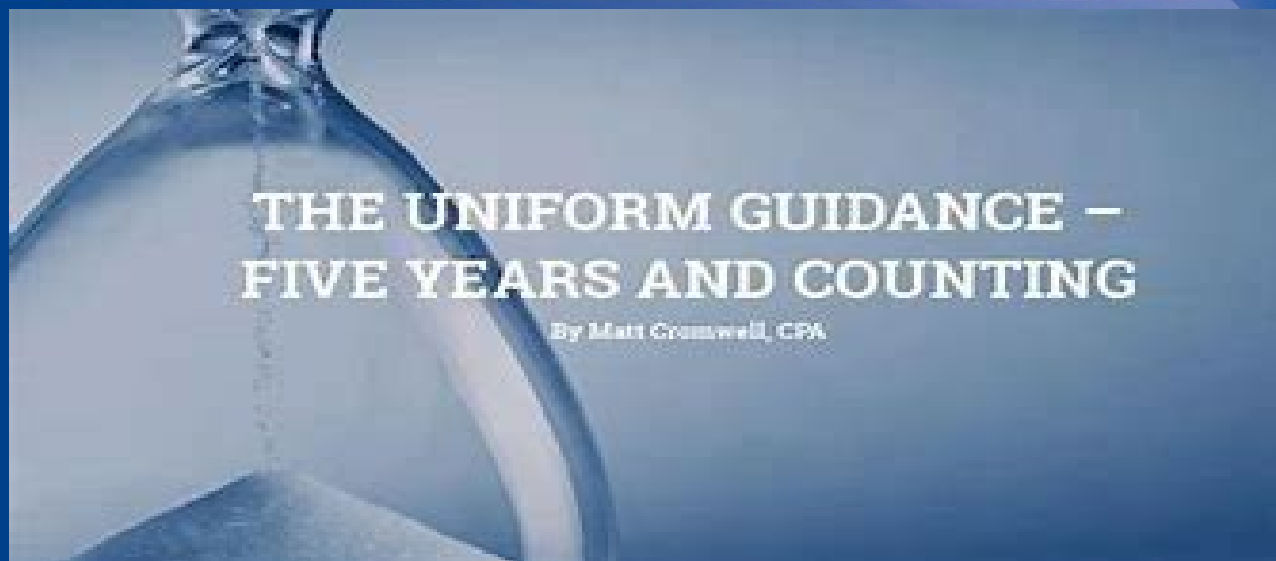
Federal Service Desk:

1-866-606-8220



2 CFR Part 200

Office of Management and Budget Updates





OMB Updates



Financial Changes:

- 200.320 – *Methods of Procurement* / 3 types of procurement:
 - Informal methods – micro-purchase and small purchase.
 - Formal methods – sealed bids and proposals.
 - Non-competitive method – sole source.
- A non-Federal entity may establish a micro-purchase threshold higher than the amount set in the FAR (currently \$10K).
- The non-Federal entity may self-certify a threshold up to \$50,000 on an annual basis and must provide supporting documentation as outlined in the section.



OMB Updates



Financial Changes:

- 200.322 – *Domestic Preference*

A non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. This language must also be included in all subawards and contracts.



A Few Word Regarding OCFO and BJA Programs Staff

- Keep in mind the thresholds discussed in this session.
- If you have questions about procurement rules, your State Policy Advisor (SPA) should be your first point of contact.
- If SPAs don't have an immediate answer, they will work with OCFO.
- BJA SPAs are
 - Wai Yee Tsang-White -- [A-D and Georgia](#)
 - Gerardo Velazquez --- [Florida and H to P](#)
 - Gale Farquhar --- [R to W](#)
- Remember we are here to help.



A Few Word Regarding OMB and BJA Programs Staff Roles

Office of Management (OMB)

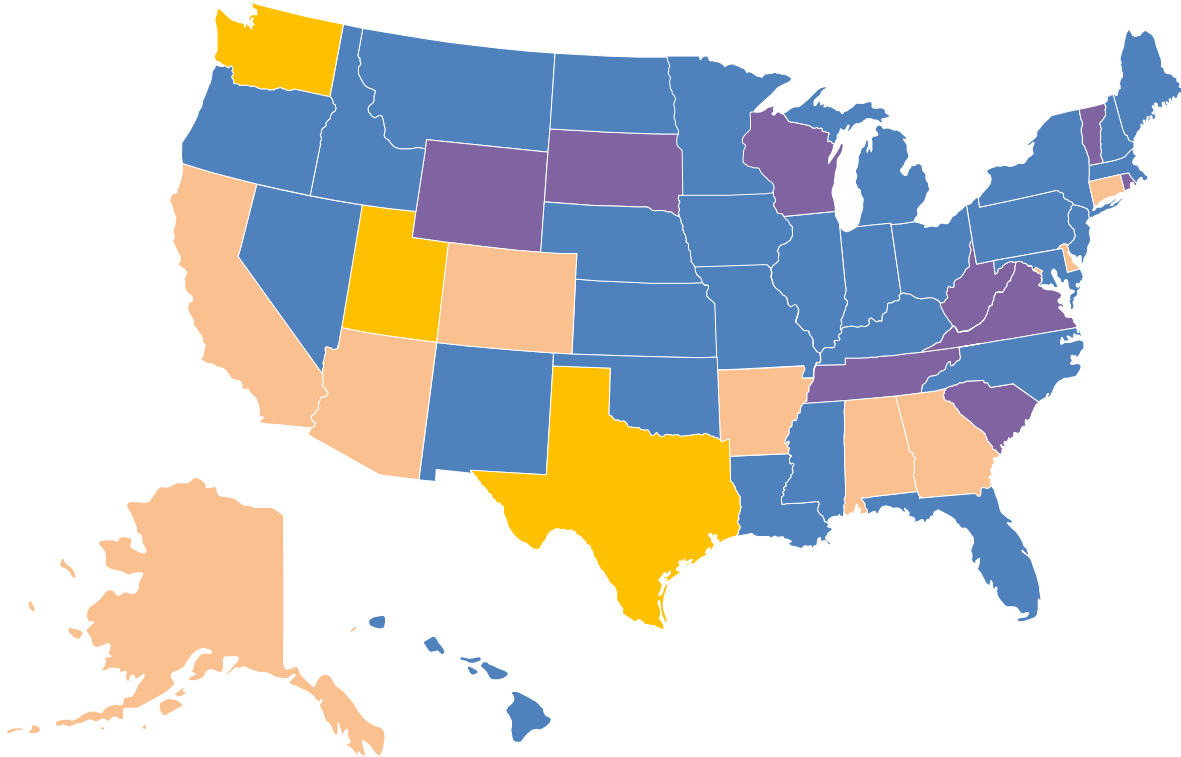
- OCFO provides policy guidance, financial control, and support services to OJP's Program Offices in the areas of grants, accounting, and financial management.
- The OCFO also provides technical assistance and training to grantees to grantees across all OJP's Program Offices (BJA, BJS, NIJ, OJJDP, and SMART)

Bureau of Justice Assistance (BJA)

- One Program Office under the Office of Justice Program (OJP) that administers BWCPPIP
- BJA is divided into two directorates or office to serve grantees
 - **Programs Office** – handles and manages **the majority** of administrative and reporting tasks and your point of contact is the **State Policy Advisor**
 - **Policy Office** – handles the content and direction of BJA grant programs, including core objective and deliverables. Works hand-in-hand with Programs Office and TTA providers in overseeing program
 - **Unique role of TTA provider in Policy Condition**



A Few Word Regarding OMB and BJA Programs Staff Roles



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OCFO Customer Service Center

Monday through Friday

8:30 a.m.–6:00 p.m. (EST)

1 (800) 458-0786 or (202) 305-9988

FAX (202) 353-9279

OCFO email Address: Ask.ocfo@usdoj.gov

*For program specific questions,
contact your program manager.*





Questions & Answers

