

Equity Across a Continuum in Grants Administration

Promising and Emerging Practices for
Ensuring Equity in Grants Administration and
Strategic Planning

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Thank you!

Thank You

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Introduction

Introduction

The civic unrest of 2020 in the wake of George Floyd’s murder laid bare the historic and ongoing injustices and disparities impacting communities of color. It also highlighted the need to intentionally center equitable policy and practice to better serve communities most impacted by systemic racism and the criminal justice system. This emerging interest in, and focus on, equity across various systems became a driver within the criminal justice reform movement, a movement that has worked for decades to reverse policies and practices that have further marginalized communities of color.

To meet this moment in criminal justice reform and the longstanding needs inherent in this work, states and local jurisdictions are re-examining planning processes, funding strategies and practices to improve fairness and equity. State Administering Agencies (SAAs)—whose expansive roles include administering roughly \$3 billion in federal criminal justice funding annually—can help shape these efforts in both the what and the how of this spending.

The National Criminal Justice Association’s (NCJA) Equity in Grants Administration and Strategic Planning Program assists SAAs in meeting this challenge. With support from the Bureau of Justice Assistance (BJA), NCJA has developed language, gathered timely information and collected findings learned through interviews with SAAs, a state and county leadership working group, partner organizations and subject matter experts.

This Equity in Grants Administration and Strategic Planning Program is designed to support SAAs in identifying opportunities to center equity in their planning processes, funding priorities and grants administration and assist them as they re-examine their policies and practices to improve fairness in their justice systems. This report, *Equity Across a Continuum in Grants Administration*, borne out of this program, is the preliminary step towards an intentional and sustained effort toward reducing disparities in the criminal justice system throughout the entire grants administration process.

Background

Background

Through in-depth interviews with SAAs, document reviews, a literature review, case studies and working group discussions, NCJA, along with its partners, identified eight promising and emerging practices for SAAs to decrease ethnic and racial disparities in grants administration and promote equity overall. Historically, racial disparities and inequities in grants administration, coupled with disinvestment in communities of color, have disproportionately impacted organizations led by Black, Indigenous and people of color (BIPOC). These organizations are often left out of funding decisions despite being most in need of funding and doing the work to reduce inequities in the criminal justice system for and within impacted communities. Using an Equity in Grants Administration Continuum framework, these practices align across different segments of the grants administration cycle.

This collection of promising and emerging practices uplifts many of the practices that federal, state and local governments use to intentionally shape their policies and core practices toward a more just and equitable grants administration process.

Shared Language

Clarifying the definition of equity is a key factor in this work. NCJA defines equity as a process of identifying and eliminating disparities and a commitment to the shifting of power and removing barriers that perpetuate inequity. This definition, developed by the equity working group, guides NCJA's framework and commitment to ensuring equity and uplifting the ways in which federal, state and local governments are working to align their policies and practices toward more just and equitable grants administration.

NCJA defines equity as a process of identifying and eliminating disparities and a commitment to the shifting of power and removing barriers that perpetuate inequity.

The definition and shared language that emerged from this process created a baseline for SAAs and other funding agencies to think critically, approach with intention and act on establishing and sustaining equity across their grants administration.

Equity is the intentional practice of change to actualize fair treatment, advancement, access and opportunity for all to thrive.

Core practices, as well as critical components and considerations, are needed to ensure equity is integrated within grants administration and strategic planning efforts at the federal, state and local levels and when defining and practicing equity across the grants administration continuum—from concept to final grant reporting.

Equity Across a Continuum

What is Equity Across a Continuum?

Equity in grants administration is a process and does not solely occur at one stage. It is intertwined throughout, from the concept to the final grant reporting. Over the past year, NCJA introduced a set of values to guide equity in grants administration and strategic planning across a continuum.

Based on the [Trust Based Philanthropy Model](#), these six values guided the highlighted promising and emerging practices shared in this report.



Equity Across a Continuum

Values to Guide the Continuum

Do the Homework/Do the Work

Administrators should do their due diligence to understand potential grantees as well as the landscape of issues and challenges. As public servants (local, county, state or federal) it is the administrator's responsibility to learn about and understand the issues and organizations across the grants administration landscape.

Simplify and Streamline Paperwork

Administrators should consider taking a conversational approach to learning about potential grantees' work, through phone calls, video calls and/or in-person meetings. A more relational approach saves time and helps funders gain a deeper understanding of the work.

Solicit and Act on Feedback

Throughout the grants cycle, work will be inherently more successful if it is informed by the expertise and lived experience of grantee partners. Grants administrators should make the time to solicit, receive and incorporate their feedback.

Flexible Funding

While the funder cannot always control how funding is allocated, they can use creative ways to establish flexible funding models that can create better access for the community. Long-term flexible funding allows organizations to allocate resources where they are most needed, making room for innovation, emergence and impact.

Be Transparent and Responsive

Modeling transparency and vulnerability and understanding potential power imbalances will help build relationships that are based on trust and mutual accountability. A key component of building trust includes being responsive to needs. Grants administrators should prioritize open lines of communication rooted in transparency and trust.

Support Beyond the Check

Funders should explore alternative ways to provide support to awardees through responsive, adaptive, non-monetary types of technical assistance as it bolsters leadership, capacity and organizational health.

Promising and Emerging Practices

Promising and Emerging Practices

Practice 1

Building Intentional Relationships Between SAAs and Communities Served

Practice 2

Advocating and Implementing Equitable Reimbursement Models

Practice 3

Fostering Collaboration/ SAA-Driven Collaboration

Practice 4

Promoting Braided Funding

Practice 5

Dedicating Staff to Drive Equity/Racial and Ethnic Disparities Priorities

Practice 6

Embedding Equity Policies within Solicitations

Practice 7

Prioritize Culturally and Socially Responsive TTA Led by Impacted Communities

Practice 8

Accessibility as a Result of COVID-19

1) Building Intentional Relationships Between SAAs and Communities Served

Practice 1: Building Intentional Relationships Between SAAs and Communities Served

The work of public safety and criminal justice is inherently more successful when continuously informed by the expertise and experience of grantee partners, organizations serving impacted communities, non-funded organizations and the communities served by those entities. Reaching out to organizations serving disparately impacted communities only during the solicitation phase of the grants administration process does not allow SAAs to be adaptive and proactive in building equitable grants administration strategies.

SAAs are developing creative ways of engaging communities and centering their voices in shaping the policies, processes and practices within the federal grants administration process.



The Washington D.C. Office of Victim Services and Justice Grants

Washington D.C.'s Office of Victim Services and Justice Grants conducts outreach to potential grantees and impacted communities through purposeful engagement and systematic outreach. This includes conducting a survey-based needs assessment every three years and intentionally engaging diverse voices and grassroots providers.

Community engagement: The agency attends community meetings to listen to the needs of communities impacted by public safety and criminal justice policies and monitors local and social media to stay abreast of challenges and needs in communities. The agency also encourages community voices to participate in Council hearings and other activities that comprise the legislative oversight of their work. Prior to the pandemic, this included additional activities, such as SAA representation at Advisory Neighborhood Commission meetings. While these meetings were mostly virtual during the pandemic, the hope is that more in-person community engagement opportunities will return.

Outreach to potential grantees: The Washington D.C. SAA reaches out to potential grantees and organizations that previously applied for funding to better understand their programs and process and to connect them with currently funded community-based organizations (CBOs) to discuss fiscal sponsorship while the potential grantees build capacity. When the SAA learns of a program that is making a difference in the community, the agency actively tries to schedule a visit to learn more and to hear from the program about what, if any, capacity considerations they should consider such as the need for a potential fiscal or administrative agent to partner with on a grant. The agency also builds relationships with non-funded CBOs, encouraging them and guiding them to apply for alternative funding that may align with their current programs.

2) Advocating and Implementing Equitable Reimbursement Models



The Illinois Criminal Justice Information Authority

Illinois Criminal Justice Information Authority's (ICJIA) Restore Reinvest Renew (R3) program disburses funds using three methods designed to ensure that grantees have the necessary cash flow to carry out programs without necessarily having the capital independently.

1. **Advance Payment:** Grantees may elect to receive payment in advance or monthly, based on their ongoing expenditure projections for the quarter. ICJIA evaluates requests for advanced payment to ensure that grantees meet certain administrative requirements. The practice is subject to some eligibility requirements.
2. **Working Capital Advances:** Grantees who are not eligible for the advance payment plan may request a working capital advance that amounts to the projection of the first two months' expenses, including startup costs. Following the disbursement of the working capital advance, grantees are paid via reimbursement of actual expenditures. Reconciliation occurs toward the end of the grant period to ensure that the grantee completes final closeout with a zero-dollar balance.
3. **Reimbursement:** Grantees who do not require advance payment or a working capital advance are paid via reimbursement of actual expenditures.

Practice 2: Advocating and Implementing Equitable Reimbursement Models

Reimbursement remains one of the core models in federal and state grants administration processes, in most cases. Funded agencies and most, if not all, grant applicants, are required to exhibit a track record of financial sustainability and/or funding reserves to accept a grant award. Well-established and sustainably funded agencies have an advantage when applying for funding as they may have a reserve fund and/or multiple funding streams that can bridge the gap between delivering services and reimbursement cycles. These cycles can range from 30-90 days depending on the reimbursement policies.¹

New and smaller-scale organizations are at a disadvantage with this type of policy/practice. Many organizations express that reimbursement is a core barrier to pursuing and maintaining federal funding. Without the ability to cover operational expenses and program costs associated with new funding, many smaller organizations may choose not to apply for federal funds. If the organization does receive funding, it faces an inability to meet payroll until reimbursement funds are released. For example, a small organization launching a newly funded program for the indigent may not have the reserve funds to meet new staff costs upfront.

This adversely affects organizations led by and/or serving BIPOC and other disenfranchised communities. Due to this, the equity gap between grassroots and community-based organizations (CBOs) and larger institutions continues to widen which in turn creates a secondary impact on the target communities served by smaller CBOs.

2) Advocating and Implementing Equitable Reimbursement Models

It is important to define and implement policies and practices that will decrease racial and ethnic disparities within the reimbursement model. SAAs have the ability to strategize and advocate for policies across the equity grants administration continuum that change the way distribution occurs. **Policies should seek to build equity for groups traditionally disenfranchised, while allowing more sustained agencies to maintain current reimbursement practices.** These policies should be developed during the strategic planning phase and mapped out across the grants administration cycle, with language crafted for the solicitation, pre-solicitation outreach and planning, and award contract phase as well as within management and reporting.

Many states have adopted more equitable reimbursement practices across their grants administration to meet agencies where they are. Examples of reimbursement models include:

Advance Payments

Advance payments are cash advances to cover the initial period of the award agreement. These types of requests are routinely put in writing and on a state authority-approved form.

13-Month Grant Cycle

Some SAAs are adding an additional month to the normal one-year grant cycle. This 13th month provides funds for one month of “start-up costs” to better acclimate grantees to the funding. This additional month also allows planning time to develop additional streams of income to bridge the gap between service delivery and reimbursement.



The Iowa Attorney General's Office

The Iowa Attorney General's Office created a *Policy on Grant Advances* that provides an opportunity for a funded agency to apply for, and receive, advance grant funds to assist programs with limited operating funds to cover essential expenses such as payroll. The funds are available to funded agencies or programs in advance of their first claim for reimbursement.

Agencies file a formal request for advance funding, detailing the need for the advance and why the agency/program would endure hardship if the advance was not approved. The formal request also includes an agency budget and the most recent program/agency audit. The form is a simple one-page spreadsheet where awarded entities document all budget expenses and line items that the entity wishes to be advanced.

3) Fostering Collaboration/ SAA-Driven Collaboration

Practice 3: Fostering Collaboration/SAA-Driven Collaboration

Collaborations are necessary for deeply engaging communities, creating a continuum of support and maximizing impact. Organizations often feel isolated within their communities and work in responding to both internal challenges and in meeting the needs of their community. The pace of federal and state grant solicitations and increased community challenges necessitates meaningful collaboration, well beyond memorandums of understanding between programs.

Deeper collaboration can be difficult as it can require intense planning, understanding of roles and tracking of participant engagement across various programs. However, as part of the agency's role, many SAAs have a pulse on which organizations and communities are engaging in similar or complementary approaches. Using this knowledge as well as discretionary tools, outreach, funding and convening, **SAAs can build relationships and facilitate coordinated efforts and responses within communities.** Fostering these relationships offers a more holistic approach to addressing varying issues within public safety and criminal justice — a critical component for more effectively leveraging limited grant funds.

SAAs can identify key partners during the planning stages of their funding strategy and subsequent solicitation development by reviewing previously and currently funded agencies whose work aligns with the current priorities identified during the strategic planning process. Identifying areas for collaboration is not only limited to the solicitation process but can also happen during the actual grant cycle as there continues to be a deeper understanding of the methods of service delivery and as any identifiable gaps in meeting population needs arise.



The Utah Commission on Criminal and Juvenile Justice

The Utah Commission on Criminal and Juvenile Justice (Utah SAA) administered a stakeholder survey as part of the Byrne Justice Assistance Grant (Byrne JAG) program centered on two priorities: comprehensive mental health strategies and indigent communities. The SAA identified two agencies it was funding in the same community with similar participant populations, both working towards better mental health access and coordination.

Recognizing that both agencies were funded by the Byrne JAG program separately, the Commission purposefully facilitated a relationship between Bear River Mental Health, a rural mental health provider, and the Bear River Health Department to steward the creation of the Cache Valley Unified Support Program to deliver a more cohesive strategy. The program consists of a multidisciplinary team that works to assist individuals with mental health and substance use issues by connecting them to community resources, with the goal of communicating as a team to find resources for individuals in crisis. The stakeholders involved include the *Bear River Health Department, Bear River Mental Health, Cache County Attorney's Office, Cache County Sheriff's Office, Logan City Police Department, Logan Regional Hospital and Utah State University.*

4) Promoting Braided Funding

Practice 4: Promoting Braided Funding

Braided funding refers to the intertwining of federal, state and private funding streams — and the development of funding strategies — to support high-quality programs. This practice allows funded organizations to receive funds to support the continuum and scope of their reach, as opposed to one or two select programs. In addition, it improves the collaboration between partners, expanding and maximizing capacity within resource-challenged environments, particularly within states that receive fewer federal resources than larger, more populated states.

Encouraging and supporting braided funding can also serve to shift narratives and break down siloed and dichotomous thinking surrounding public safety programming. For example, braided funding can better support programming like reentry programs focused on the trauma and recovery needs of individuals returning to their communities from incarceration who have also been victims of violence.



The Pennsylvania Commission on Crime and Delinquency

As Pennsylvania's SAA, the Pennsylvania Commission on Crime and Delinquency (PCCD) administers dozens of federal and state grants and uses a braided funding model to maximize funding. Pennsylvania outlines sound strategic planning and stakeholder engagement as essential to implementing a successful braided funding model. PCCD uses a statewide strategic framework to identify funding usage and, as part of the strategic planning process, engages with a 49-member commission, six advisory committees, subcommittees, staff, local planning boards, applicants and grantees to identify agency priorities and objectives.

Discussions regarding appropriate funding streams are built-in with the goal of leveraging and extending dollars as much as possible within the rules. Through Memorandums of Understanding (MOUs), PCCD also works with other state agencies such as the Department of Drug and Alcohol Programs and the Department of Human Services to help administer grants. This communication and collaboration allow PCCD to further coordinate multiple forms of funding.

5) Dedicating Staff to Drive Equity/Racial and Ethnic Disparities Priorities

Practice 5: Dedicating Staff to Drive Equity/Racial and Ethnic Disparities Priorities

Some of the most impactful SAAs driving the focus on equity currently invest in staff who focus specifically on racial and ethnic disparities (R/ED) and issues related to equity. Staff who spend all or significant portions of their time on equity and R/ED issues and are embedded within the agency and/or department that administers funds are not only an important statement showing the value the agency places on addressing and reducing racial and ethnic disparities, but are also often a necessity in moving this work forward.

This investment helps ensure sustainability and consistency of equity practices within SAAs that can withstand changes in agency and legislative leadership. This practice also signals to communities that states are invested long-term and can help build trust between SAAs and the communities they serve.



The Utah Board of Juvenile Justice

The Racial and Ethnic Disparities (R/ED) Collaborative is a component of the Utah Board of Juvenile Justice (UBJJ) that was created to help address a core protection of the federal Juvenile Justice and Delinquency Prevention Act (JJDP A) which requires states to assess and address racial and ethnic disparities at key points in the youth justice system. While the genesis to the creation of the R/ED Collaborative was a federal mandate, there is unified commitment across all juvenile justice stakeholders to tackle the overrepresentation of minority youth across systems. The Collaborative is staffed by a full-time R/ED Coordinator.

The Collaborative and UBJJ approach all aspects of their work with an emphasis on promoting policy and practice intended to reduce racial and ethnic disparities in Utah. This emphasis carries through to grant funding, legislative review, public education and outreach, and collaboration. One example is the R/ED Collaborative's Civic Engagement Training Program which offers an opportunity for young adults and professionals who work with young adults in Utah to engage with juvenile justice system stakeholders and to learn how to become involved as leaders and advocates who are empowered to connect with and contribute to the positive trajectory of the state's juvenile justice system efforts in reducing racial and ethnic disparities.

6) Embedding Equity Policies within Solicitations

Practice 6: Embedding Equity Policies within Solicitations

To ensure equity goes beyond the definition as a baseline, it must be embedded in policies and practices across the grants administration continuum. **It is imperative to build out policies within the solicitation process, including clear and actionable language, and ensure organizations prioritize equity as well as create accountability mechanisms for equity in their infrastructure and service delivery.** Several states have developed key policies and practices in their solicitations that allow SAAs to prioritize funding organizations that intentionally center equity.



The Utah Board of Juvenile Justice

The Utah Board of Juvenile Justice (UBJJ) recognized that, while it was funding youth programs, disabled youth were at a high risk of justice involvement, and without designated services and support. To meet the need and ensure equity, UBJJ now offers bonus points for applications that prioritize youth with disabilities within their application. UBJJ also includes a detailed definition and explanation to guide applicants which states:

UBJJ believes that diversity, inclusion and belonging are for all Utahns. Grant applications demonstrating intent, design, and process to include youth who are disabled, including but not limited to physical, mental, or emotional disabilities, will receive bonus points during the grant evaluation review. Grant applications should include evidence of:

- *Intent: a clear emphasis on inclusion in the project*
- *Design: how the youth who are disabled will be involved*
- *Process: the integral involvement throughout the project of youth who are disabled and the process by which the effective implementation of the project will be evaluated*

Utah's explicit acknowledgment of a marginalized group and prioritization of their needs within the grants administration process establishes sustained investment. In addition, prioritization allows for the continuing practice of change. Grant administrators must continue to reassess the intersections of identity that contribute to disparities within marginalized communities.

7) Prioritize Culturally and Socially Responsive TTA Led By Impacted Communities

Practice 7: Prioritize Culturally and Socially Responsive Training and Technical Assistance Led By Impacted Communities

Feedback from funded agencies noted barriers in grants management and reporting, particularly for recently funded agencies. Funded agencies with a long history of receiving federal and state funding were more versed in the management and reporting structures. In comparison, smaller, less established and community-based organizations often lacked the infrastructure to manage and sustain federal and state funding, even though their programs aligned with federal and state grant priorities.

In addition, organizations led by and supporting marginalized communities (including Black, Indigenous and people of color) may have cultural and social approaches to service delivery that differ from those traditionally funded through federal and state grant priorities. These entities may be less inclined to apply for funding, or face higher rates of rejection because of the gaps in infrastructure, and cultural and social understanding of their services.

SAsAs should partner with culturally and socially-responsive training and technical assistance (TTA) providers that have knowledge and experience across a range of communities. Partnering with TTA providers that are from impacted communities allows for more meaningful understanding and engagement. These partners can address specific challenges and disparities potential grantees face, without the subjectivity that may unconsciously compromise a potential grantee's eligibility.

SAsAs understand that TTA is essential for access, support and success of grantees and potential grantees. They have traditionally responded with some form of internal TTA support within the solicitation and grant management phases. However, internal TTA programs may not have the relationships or specific knowledge of a unique cultural and social set of needs for certain populations. This is why having TTA providers from, and for, the community is so important.

Utilizing culturally and socially responsive TTA providers can build trust between organizations and SAsAs; this practice is rooted in creating transparency, accountability and intentionality. It affirms that SAsAs are committed to understanding and supporting a community's success, no matter the size, approach and scope of their work.

7) Prioritize Culturally and Socially Responsive TTA Led By Impacted Communities



The Washington D.C. Office of Victim Services and Justice Grants

Washington D.C.'s Office of Victim Services and Justice Grants hosts trainings to walk through the Request for Application (RFA) process and pairs independent technical assistance consultants with potential grantees to discuss program concepts, review narratives and budgets, and support the successful submission of applications. These technical assistance components were specifically designed to be directly supported by the SAA yet driven externally by partners and consultants so as not to impede eligibility for grants. This has led not only to an increase in the number of applications, but also the variety, growing the availability of unique reentry programs for people returning to their communities from incarceration and more.



The Illinois Criminal Justice Information Authority

The Illinois Criminal Justice Information Authority (ICJIA) has created an innovation institute to help increase access and success for organizations trying to secure federal and state funds. ICJIA's Institute 2 Innovate develops and enhances the relationship between the agency and potential awardees discussing in detail how organizations can successfully write, apply and administer a grant. Organizations that have either been denied previously, or have never applied for funding due to capacity issues, are connected with an agency staff member who serves as a grant coach. The grant coach provides intensive technical assistance to assist in capacity building so that the applicant organization can be more competitive when applying for future funds.

8) Accessibility as a Result of COVID-19

Practice 8: Accessibility as a Result of COVID-19

The pandemic shifted the ways institutions and communities engaged. Local, state and federal governments were forced to adjust their approaches to grantee communities and reevaluate methods of access to ensure consistency of grant policies and practices as well as to adjust to a remote culture. Expanded accessibility became a necessity.

Some SAAs have typically required hard copy applications, as well as hand-signed contracts and hard copies of supplemental documents (i.e. independent audits) in addition to electronic documents. **The required shift during the pandemic amplified the ways in which SAAs needed to develop and expand practices around accessibility that would ease access barriers, particularly for smaller community-based organizations and entities with limited resources.**

Accessibility across the grants administration continuum ensures that those who face disparities have equitable access to information, partnership and opportunities.

Promising practices and examples of accessibility include:

Offering digital signatures

Utilizing digital signatures for grant applications, award notification letters and contracts eliminates the burden of travel and reduces the risk of missed deadlines for funded entities that do not have access to transportation.

Verbal acceptance of documents

When appropriate, verbal acceptance of documents eliminates transportation barriers and breaks down inequities in language access for funded agencies. Expanding verbal acceptance to incorporate additional languages can also provide greater access for communities.

Virtual options as standard

The pandemic forced the use of virtual options to share information, maintain contact and build relationships with communities. Sustaining these virtual options has the potential for sustaining community engagement and reaching new populations of impacted communities and the organizations that serve them.

Connecting Practices and Values Across the Continuum

1) Building Intentional Relationships Between SAAs and Communities Served

Do the Homework/Do the Work
Simplify and Streamline Paperwork
Solicit and Act on Feedback
Flexible Funding
Be Transparent and Responsive
Support Beyond the Check

2) Advocating and Implementing Equitable Reimbursement Models

Flexible Funding

3) Fostering Collaboration/ SAA-Driven Collaboration

Do the Homework/Do the Work
Solicit and Act on Feedback
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4) Promoting Braided Funding

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Be Transparent and Responsive

Employing Multiple Practices on the Continuum



The Colorado Division of Criminal Justice

As Colorado's SAA, the Colorado Division of Criminal Justice manages multiple federal and state grant programs. This funding includes an influx of grant programs through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), the American Rescue Plan Act (ARPA), several state public safety grant programs, and more over the last few years.

Staff in the Division's Office of Victim Programs (OVP) and Office of Adult and Juvenile Justice Administration (OAJJA) analyzed the distribution of grant dollars through these new programs and noted that the targeted recipients for which they were intended were traditionally under-represented as grant recipients. The staff worked jointly with stakeholders to remedy this issue and create a path for increased diversity in fund distribution in the future.

After identifying the reasons for underrepresentation, all of which were identified throughout this report, OVP and OAJJA staff undertook these steps to increase equity in the administration of their grants:

- Including leaders of CBOs and grassroots organizations as members of grant review committees to provide context and background on why a proposal might be written in the way that it is.
- Expanding pre-application workshops to assist new and small applicants in writing their proposals so that they can better compete.
- Contracting with one or more CBOs with a strong financial and evaluation history to act as an intermediary between the state and less-experienced applicants and serve as their fiscal agent. This strategy allows the fiscal agent to manage and provide quality control on the administrative and operational aspects of the program, alleviate concerns about the applicant's history with meeting these types of financial obligations and provide the applicants a liaison with the state whom they know and trust.
- Utilizing stakeholders who are familiar with the CBOs and grassroots organizations to assist in the application process's marketing, proposal development and other aspects to encourage more organizations to submit proposals.
- Collecting data that documents the degree to which the dollars are being distributed to organizations that may not have been able to successfully compete previously.

These and other steps will be monitored to determine the degree to which they have helped produce more diversity in the grantee pool and determine action steps to adjust as necessary.

Conclusion

Conclusion

An emerging interest and action towards greater equity across criminal justice grantmaking systems served as the impetus for compiling and highlighting practices that reflected a shift from standard practices and policies. SAAs can determine which practices can add value to this emerging work within their agencies and build collective buy-in from stakeholders to adopt practices that drive equity.

Sharing practices across the grants administration ecosystem, rooted in intentionality and transparency, can serve as a roadmap for grantmaking entities and communities working to build tangible and sustainable practices rooted in equity and care.

Key Findings From This Report

- Equity Across a Continuum refers to the process of embedding equity in the grants administration process from initial concept to final grant reporting. Developing shared language and core practices are integral to ensuring equity is present at each stage.
- Find creative ways to engage impacted communities in all aspects of the grants administration process. Engagement should extend beyond the solicitation phase and feedback should drive the creation of better policies, practices and processes.
- Recognize the disadvantages inherent in the typical reimbursement model, specifically for small grassroots agencies, and consider alternatives such as advance payment and working capital advances. The aim is to build equity and capacity for traditionally disenfranchised groups while maintaining current reimbursement practices for larger organizations.
- Understand which organizations and communities might engage in similar or complementary approaches to public safety and crime reduction and utilize the tools of outreach, convening and funding to build relationships and facilitate coordinated efforts and responses.
- Invest in staff whose primary role is to address racial and ethnic disparities and aim to ensure sustainability regardless of any changes in leadership.
- Channel the power inherent in a solicitation's language by ensuring language is clear and actionable, therefore applicants can prioritize equity within and across projects and create accountability mechanisms for equity in program infrastructure and service delivery.
- Strengthen internal TTA services and consider partnering with culturally and socially responsive TTA providers spearheaded by individuals from impacted communities.
- Expand accessibility by offering digital signatures, verbal acceptance practices and codifying virtual options for participation and communication.

Improving equity within grants administration is an iterative process, one that requires continuous effort, collaboration and intentionality. NCJA will continue to center equity within its work and find innovative ways to share recommendations and promising practices with all SAAs. Four case study projects are ongoing, a process that delves deep into individual grants administration and strategic planning processes for Byrne JAG and VOCA funding streams, with the wider intention of applying recommendations gleaned through the process to the administration of all federal funds and beyond.

About the Case Studies

State Case Studies

About the Case Studies

The case study component of the NCJA Equity in Grants Administration and Strategic Planning Program focuses on learning and growth. The case study process is designed to examine how an SAA's existing processes incorporate equity within grantmaking and grant administration, to lift up promising practices that may be built upon, formalized, and/or shared with other jurisdictions, and to offer recommendations for enhancing equity through changes in substance and process.

During the program's inaugural year, three states volunteered to participate in this process: Colorado, Kentucky and Minnesota. Through participation in the case studies, each state made a clear statement of its leadership and commitment to diving deeper into advancing its equity work. Each state has worked with the program team on the following steps: an initial interview/discussion with key personnel, extensive document requests, which are then reviewed by the equity subject matter experts, and follow-up discussion to ask questions and otherwise help clarify issues that emerge.

The program's case study work is still ongoing, to ensure a thorough review of the dozens of key documents supplied by each state spanning the grantmaking and administration continuum and its many steps. Ultimately, the process is designed to yield a final written case study document and accompanying recommendations tailored to each state, including examples of possible training, technical assistance or other support that can help the state reach its goals and rise to the next level of this work. Ideally, a case study process when done well, even when focused on the unique aspects and situation of that particular state, will yield information that is beneficial to other similarly situated states and jurisdictions.

Given the unique structure of the SAA, every state started and focused its equity work in a different place, though common themes quickly emerged. Furthermore, this process has affirmed that a true top-to-bottom review of existing processes and practices takes considerable time, especially when done in thoughtful consideration of the ways in which different aspects of the grantmaking and grants administration interconnect, and how each play a role in the relationships the agency has with the communities it serves. Each of these three states provided a wealth of information, including dozens of documents illuminating where they are and where they are headed.

Findings From the Case Studies

What We Have Learned So Far

Understanding that the case study work is ongoing, as an interim update, below are some of the salient takeaways from the process thus far.

Current events and political context matter

This aspect of the conversation surrounding Byrne JAG administration, policy and planning can be difficult, but it is critical and inevitable— the world around us matters. The murder of George Floyd and its aftermath was present in every state’s criminal justice discourse, including the three case study states, especially Minnesota.

Not only did these events lead to a surge in attention and advocacy surrounding needed shifts in policy and funding, but the SAA’s own grantees were experiencing numerous challenges related to program implementation, grant reporting and more. For example, some Byrne JAG grantees had to evacuate their space due to fires in the aftermath of protests. The combination of these painful events alongside the complications and delays of the pandemic created a level of exhaustion palpable within grantees and the SAA alike.

The intensity of the aftermath also included state politicians who made public statements or promises that were not necessarily aligned with the SAA’s existing grant capacity. In some instances this left the SAA staff answering for resulting disconnects. This was further complicated by the ways in which the funding apparatus varies at state and county levels, and the split political control of the state’s Senate and House.

In addition to the intense impact of 2020 events, in Colorado, major criminal justice reforms passed, presenting unprecedented grants administration and program implementation needs. The governor tasked the SAA with numerous public safety improvements, all while it adapted to the grant administration needs of 15 new programs, spanning cold cases of missing and murdered Indigenous women and crime prevention through environmental design.

The police killing of Breonna Taylor created a similar “flash point” in the discourse in Kentucky. Among other developments greatly impacting the SAA was an increase in calls for accurate data on the role of race in the criminal justice system, especially as a way to meaningfully inform intensifying debate over needed reforms.

Strides have been made in equity in victim services funding

In the case study states, SAAs noted they have made some progress in reaching new community-led grantees and underserved populations through funding streams like the Victims of Crime Act (VOCA) and Violence Against Women Act (VAWA) grants. Whereas more targeted language and tools

Findings From the Case Studies

within that funding have emerged at the state and federal level, overall SAA staff have found it “more challenging” to apply a similar lens to Byrne JAG funding notwithstanding its greater flexibility.

Offering more meaningful capacity building through improved training and technical assistance for potential subrecipients is a common goal and unmet need

Each of the case study states shared the goal of bolstering the capacity-building efforts for its applicants, potential applicants and existing grantees, including that which is tailored to smaller community-based organizations. Currently, any technical assistance that exists is highly limited, often to grant mechanics such as financial reporting, and is often only available to existing grantees and applicants. It is clear to case study states the ways in which this leaves out a key constituent of their equity work— grassroots, community-based organizations that have long been excluded from funding. Subsequent phases of the case study process can hone in on ways in which the SAA can deepen and forge new relationships, listen to their constituents to learn about their unique barriers and identify organizational needs. And to answer the question, *is the SAA appropriately equipped internally to provide the assistance that is called for?*

It is clear to all three states that listening to the community is essential to equity, and this requires improved relationships. One clear indication of this shows up in a critical component of the existing Byrne JAG process in multiple case study states: the survey efforts used to inform their grantmaking. For example, 80 percent of respondents in the most recent Minnesota survey indicated they were representing a criminal justice professional viewpoint, with only 20 percent responding from the lens of a community member. Similarly in Colorado, a majority of respondents were from local government (49 percent); state government (29 percent) and non-profits (10 percent), a concrete area that requires a deeper and more intentional look at robust community participation.

The importance of looking inward

All three case study states shared existing steps or aspirations to shift their internal SAA culture through training, staff surveys and other activities focused on diversity, equity and inclusion. Two aspects of this will be key to shaping and maximizing the impact of these efforts. One, if the SAA is currently taking an “opt-in” approach, future iterations of this work might focus on ways in which leadership can ensure they are reaching and connecting with staff who may be less likely to self-select into this work, while also accounting for the challenges in mandated training that staff feel required to attend rather than invested in. And two, especially based on their own internal learning, what role may the SAA play in offering resources to its subrecipients? One state shared that some grantees respond to questions of access and coverage with “we don’t serve those groups because they do not exist in this community,” a response that is clearly more reflective of a lack of awareness or erasure than a lack of existence.

Findings From the Case Studies

There is a widespread need to examine the diversity of Advisory Board Membership and grant reviewers

This is true in each case study state and in jurisdictions throughout the country. One example of a specific challenge that emerged is the need for the SAA to establish a process to pay community reviewers, who bring a much-needed diversification to this key grantmaking role. In addition to valuing the time and expertise of participating community members, it can also serve as an important incentive to attract new people to the role who should not be asked to volunteer.

Overcoming the exclusionary impact of reimbursement models in Byrne JAG and other federal funding, and other key topics

Multiple states involved in the case study currently do not have an apparatus for alternatives to reimbursement models in Byrne JAG, which typically operate on a monthly or quarterly reimbursement basis. This has long played an obvious and widespread role in making this funding unrealistic for smaller community-based organizations unable to front expenses, and the active work some SAAs are putting into addressing this problem presents an opportunity for furthering concrete solutions in case study states.

Similarly, case study states vary in the existence of a tiered funding approach to ensure that similarly sized organizations are competing with one another to help level the playing field, and the active development of a new scoring apparatus for BIPOC-led organizations. Other areas of potential in the next phase of case study work include more intentional development of braided funding strategies, and the role of program evaluation, given the many equity considerations this contains. For example, when projects with an evaluation component are seen as stronger candidates, it begs questions the case study process may address, such as *what plans does the SAA have to support or incentivize a meaningful and community-participatory approach to program evaluation with their grantees?; and how are they ensuring they are not penalizing grassroots organizations that do not currently have the capacity to engage in such activities and research partnerships at this time?*

Endnotes

1 States (or State Administering Agencies) or units of local government may draw down Byrne JAG funds either in advance or on a reimbursement basis. To draw down in advance, a trust fund must be established in which to deposit the funds. The trust fund must be in an interest-bearing account, unless one of the exceptions in 2 C.F.R. § 200.305.b.8 apply. If subrecipients draw down Byrne JAG funds in advance, they also must establish a trust fund in which to deposit funds. For additional information, see 2 C.F.R. § 200.305. <https://bj.a.ojp.gov/doc/jag-faqs.pdf>

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