

Comment: One respondent felt that the Proposed Comprehensive Program Plan outline was unclear as to which programs allow a community-based organization to compete for funding and that many of the eligibility requirements seem to exclude community organizations with experience, providing only limited opportunities for these qualified organizations to receive OJJDP funding.

Response: OJJDP recognizes the importance of community-based organizations, particularly in the planning phase of any collaborative project. The SafeFutures Program specifically calls for community-based collaboratives. Community-based organizations have the experience to operate a broad range of programs. In cases where only local units of government are eligible for awards, community-based organizations should pursue the option of partnering with them as a service provider or administering agency.

Comment: A community-based organization commented that despite its varied experiences in a number of areas, including mentoring, it would be unable to compete for Part G Mentoring Funds, Title V Incentive Grants, and Part E State Challenge Activities. The respondent organization felt that these activities should require that funds go to community-based organizations that have significant experience providing culturally appropriate programs to at-risk ethnic minorities. Without this requirement, a real partnership will not be achieved.

Response: For the activities mentioned above, community organizations can still qualify for support but they must do so through a local unit of government. For example, \$1 million in fiscal year 1995 Part G Mentoring Program funding is being awarded through the SafeFutures program. Mentoring is a logical component of a continuum of care for youth-at-risk. Under Part G and the SafeFutures Program, mentoring programs are required to be conducted either by LEA's (local education agencies) or by non-profit private organizations (including community-based organizations) or public agencies in partnership with LEA's.

Comment: One respondent questioned whether the Native American Alternative Community-Based Program will receive additional funding in fiscal year 1995.

Response: Continuation funding of \$600,000 will be available for this program in fiscal year 1995.

Comment: One respondent commented that the description of the

Juvenile Justice Prosecutor Training Project is vague and that training should include cultural awareness and how poverty-related and misunderstood cultural behaviors affect decisions.

Response: The Juvenile Justice Prosecution Training Center will support prosecutor training in areas of need identified by a working group of chief prosecutors. OJJDP expects that cultural differences and poverty-related problems among juvenile offenders will be covered in the training. In addition, OJJDP continues to support training in cultural differences for juvenile justice officials under a grant to the American Correctional Association for the Training in Cultural Differences for Law Enforcement/Juvenile Justice Officials Program.

Comment: A respondent noted that the description of Interventions to Reduce Disproportionate Minority Confinement in Secure Detention and Correctional Facilities Program indicates that the application process is open to new applicants. However, the program is listed under Continuation Programs. It is unclear if additional organizations can apply.

Response: This project was inadvertently listed under the Continuation Programs section. New applicants will be eligible to apply for OJJDP funding in fiscal year 1995.

Comment: A respondent noted that the Nonviolent Dispute Resolution Program is listed under Continuation Programs, indicating that only prior recipients can apply. The description, however, seems to contradict this by indicating a competitive application process.

Response: This is a competitive program being administered by the Bureau of Justice Assistance for cities which have been selected to receive funds under the Comprehensive Communities Program. OJJDP is contributing funds to the program.

Comment: One State official commented that OJJDP should notify the State Formula Grants Program Agency when a project is selected for funding within a given State.

Response: OJJDP agrees that in the interest of comprehensive planning and interagency coordination, cognizant State agencies should be notified when OJJDP awards funds directly to projects operating with the State. A formal notification process will be initiated to provide information on all discretionary grant awards to State agencies.

Comment: One respondent proposed that OJJDP adopt a policy to provide periodic updates to State agencies on projects selected for funding under the SafeFutures Program.

Response: The SafeFutures Program is based on a continuum of care model that calls for maximum coordination and cooperations among agencies serving juveniles. OJJDP encourages States having SafeFutures sites to include SafeFutures in the comprehensive planning undertaken for the Formula Grants Program and make maximum use of Formula Grant, Title V, and Challenge Grant funds to enhance juvenile justice and delinquency prevention activities in SafeFutures sites. While the level of State agency participation expected in SafeFutures should obviate the need for "periodic updates" by OJJDP, funded sites will be required to provide the cognizant State agency with a copy of their quarterly progress report.

Comment: A national organization expressed concern about the level of support in the fiscal year 1995 Program Plan for programs to address disproportionate minority confinement.

Response: OJJDP is strongly committed to supporting State efforts to address the disproportionate confinement (DMC) of minority juveniles in secure custody in States where such condition exists. The Office has supported demonstration efforts under the Special Emphasis discretionary grant program, as well as research, program evaluation, and training and technical assistance in this area. Many States are allocating significant amounts of their Formula Grants Program funds to address section 223(a)(23) of the JJD Act.

OJJDP is working with the Coalition for Juvenile Justice's Committee on Ethnic and Cultural Diversity to find other ways to improve our DMC programming. OJJDP looks forward to cooperative efforts with the Coalition and others committed to improving juvenile justice by addressing the DMC issue.

Comment: One respondent suggested that OJJDP add language to the section which describes organizations with whom OJJDP would coordinate the SafeFutures Program to include Youth Corps that are certified by the National Association of Service and Conservation Corps and provide participants with a six to twelve month, full-time, crew-based, highly structured, and adult supervised work and learning experience, and that promote the development of citizenship, life and employment skills.

Response: OJJDP concurs with the importance of coordinating the SafeFutures program with Youth Corps programs that have a component serving a juvenile population. The Office has incorporated appropriate language into