# UOVC GRANT MANAGEMENT TRAINING

#### Introductions

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# LEARNING OBJECTIVES

- Overall: To understand how to accurately manage your grant/contract according to both State and Federal Guidelines and implement a successful grant program
  - To understand what costs are to be billed under your grant and how to properly submit a reimbursement request for your contract
  - To understand the correct way to modify your contract if necessary
  - To understand the types of reports that are required for your contract
  - To know what to expect in the monitoring of your contract
  - To know how to close-out your contract

# TRAINING OVERVIEW

Monday, September 21st

- Certified Assurances and Grant Conditions
- · Victims' Rights and Civil Rights Overview
- · Confidentiality

# TRAINING OVERVIEW

Tuesday, September 22<sup>nd</sup>

- · Programmatic Reporting
- Grant Costs and Financial Reporting

# TRAINING OVERVIEW

Wednesday, September 23<sup>rd</sup>

- · Amendments
- · Audits/Paybacks
- Grant Closeout

**A:2** Applicability of Part 200 Uniform Requirements and DOJ Grants Financial Guide:

Part 200 Uniform Requirements-The subrecipient agrees to comply with Part 200 Uniform Requirements.

https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200/summary

A:3 Requirements Related to System for Award Management Identifiers (SAM)

The recipient must comply with applicable requirements regarding the System for Award Management (SAM), currently accessible at https://www.sam.gov. This includes applicable requirements regarding registration with SAM, and well as maintaining current information in SAM.

### A:4 Required SAM and FAPIIS Reporting

The recipient must comply with any and all applicable requirements regarding reporting of information on civil, criminal, and administrative proceedings connected with (or connected to the performance of) either this UOVC award or any other grant, cooperative agreement, or procurements contract from the federal government. Under certain circumstances, recipients of UOVC awards are required to report information about such proceedings, through the federal System for Award Management (known as SAM), to the designated federal integrity and performance system (currently FAPIIS).

# A9: Restrictions on "Lobbying" and Policy Development (VAWA Section A8)

Federal funds may not be used by the recipient either directly or indirectly, in support of the enactment, repeal, modification, or adoption of any law, regulation or policy, at any level of government, in order to avoid violation of 18 U.S.C. § 1913

Another federal law generally prohibits funds awarded by UOVC from being used by the recipient to pay any person to influence (or attempt to influence) a federal agency, a Member of Congress, or Congress (or an official employee of any of them) with respect to the awarding of federal grant or cooperative agreement, subgrant, contract, subcontract, or loan, or with respect to actions such as renewing, extending, or modifying such award. See 31 U.S.C. § 1352

#### **A:17** Non - Supplanting:

The recipient agrees that grant funds will be used to **supplement**, **not supplant**, **non-federal funds that would otherwise be available for the activities under this grant**.

- Supplanting is using federal money to replace available, state, local or private funds. \*
- Non Supplanting applies to every agency taking UOVC funds.
- Grant applications and grant amendments will require throughout justification where supplanting may be a concern.

### A:19 Maintaining Contact Information:

The recipient acknowledges that it is responsible for maintaining updated contact information in the Grants Management System (GMS).

- Key Point of Contact
- Program Log In
- Program and Financial Managers

#### A:22 Publication Disclaimer:

The recipient agrees that all *materials and publications* (*written, web-based, audio-visual, or any other format*) resulting from award activates shall contain the following statement:

"This project was supported in part by the Utah Office for Victims of Crime, awarded by the [Office on Violence Against Women] or [Office for Victims of Crime], U.S. Department of Justice. The opinions, findings, conclusions, and recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the U.S. Department of Justice or the Utah Office for Victims of Crime."

## A:24 Audit Requirements (VAWA Section A23)

The recipient agency expending more than \$750,000 in Federal funds per year assures that it will submit audit reports to UOVC annually. The audit report must comply with OMB circular A-133 and be submitted to UOVC within one month of completion of the audit.

#### **B:8 Termination of Aid**

If through any cause the grantee shall fail to substantially fulfill in a timely and proper manner all its obligations, terms, covenants, conditions, or stipulations of the grant agreement, or substantially fails to comply with the Violent Crime Control and Law Enforcement Act of 1994 reauthorized through the Victims of Trafficking and Violence Protection Act of 2000, and again reauthorized in 2013; and any regulations promulgated under these laws, as determined by the UOVC, then the **UOVC** shall have the right to terminate the grant agreement or to suspend fund payments by giving written notice to the grantee of such action and specifying the effective date thereof, at least thirty (30) days before the effective date of such action. In such event, all finished and unfinished documents, data studies, surveys, drawings, maps, models, photographs and reports prepared by or on behalf of the grantee under the grant agreement shall at the option of the UOVC, become its property, and the grantee shall be entitled to receive just and equitable reimbursement of any work satisfactorily completed under the grant agreement.

### **B:10 Personal Property**

The grantee shall retain any non-expendable personal property acquired with grant funds in the grant program as long as there is a need for the property to accomplish the purpose of the grant program whether or not the program continues to be supported by UOVC grant funds. When there is no longer a need for the property to accomplish the purpose of the program, the grantee shall request property disposition instructions from the UOVC.

# B:13 Third Party Participation

No contract or agreement may be entered into by the grantee for execution of project activities or provision of services which are not incorporated in the approved proposal or approved in advance by the UOVC. Any such arrangement shall provide that the grantee will retain ultimate control and responsibility for the grant project and that the grantee shall be bound by these grant conditions and any other requirements applicable to the grantee in the conduct of the project. The UOVC shall be provided with a copy of all such contracts and agreements entered into by grantees.

## B:14 Descriptions of Programs:

The grantee agrees that when issuing statements, press releases, requests for proposals, bid solicitation, and other documents describing projects or programs funded in whole or in part with Federal money, all grantees receiving Federal funds, including but not limited to state and local governments, shall clearly state (a) the percentage of the total cost of the program or project which will be financed with Federal money, and (b) the dollar amount of Federal funds for the project or program.

### B:16 Program Director:

There **shall at all times** during the life of the grant agreement be an **individual appointed by the grantee as "Program Director."** This individual will be responsible for program planning, operation and administration under the grant agreement.

#### B:25 Criminal Penalties:

A) Whoever embezzles, willfully misapplies, steals or obtains by fraud or endeavors to embezzle, willfully misapply, steal or obtain by fraud any funds, assets, or property which are the subject of grant or contractor or other form of assistance pursuant to this title, whether received directly or indirectly from the Administration; or whether receives, conceals, or retains such funds, assets, or property to his use or gain, knowing such funds, assets, or property to have been embezzled, willfully misapplied, stolen, or obtained by fraud, shall be fined not more than \$10,000 or imprisoned not more than five years, or both. B) Whoever knowingly and willfully falsifies, conceals, or covers up by trick, scheme, or device, any material fact in any application for assistance submitted pursuant to the Act, whether received directly or indirectly from the Administration, shall be subject to the provisions of **Section 371 of Title 18, U.S.C.** 

66

# B:26 Nonprofit Organization Requirement (VAWA Section B24)

Any entity that is eligible for a grant based on its status as a nonprofit organization must be an organization that is described in section 501(c)(3) of the Internal Revenue Code of 1986 and is exempt from taxation under section 501(a) of that Code. See 42 U.S.C. § 13925(b)(16)(B).

All (nonprofit) subrecipients must report financial information to the Utah State Auditor's Office. Information on reporting guidelines can be found here:

https://site.utah.gov/auditor/wp-content/uploads/sites/6/2018/05/REPORTING-REQUIREMENTS-FOR-NGOs.pdf

# B:31 Compliance with Federal Financial Guidelines (VAWA Section B29)

Federal grants are governed by the provisions of the OMB circulars applicable to financial assistance and the DOJ Grants Financial Guide, which can be found at https://ojp.gov/financialguide/doj/pdfs/DOJ\_FinancialGuide.pdf The Financial Guide includes information on allowable costs, methods of payment, audit requirements, accounting systems, and financial records. This document outlines the successful administration of grant funds. Each grantee agrees to follow the financial and administrative requirements in the DOJ Grants Financial Guide at https://ojp.gov/financialguide/doj/pdfs/DOJ\_FinancialGuide.pdf as a condition of receiving grant funding. If UOVC determines that a current grantee has violated any of the requirements of the Guide, the grantee may be denied access to funding.

#### B:33 Finalization of Contract:

The grantee shall submit the contract within **90 days of contract beginning date**. Funds authorized through the Request for Proposal and final approval process may be null and void after the 90 day period.

# B:34 Cost Principles (VAWA Section B32)

Grantee agrees to abide by applicable Cost Principles including for State or Local Unit of Governments or Tribal Organizations Cost Principles found in Title 2 CFR, Part 225 (OMB A-87) and Title 2 CFR, Part 230 (OMB A-122) for non-profit organizations. In addition, US DOJ Administrative Requirements Reference Cost Principles in 28 CFR 66.22 and 28 CFR 70.27. Grantee agrees to comply with applicable Administrative Requirements found in Title 2 CFR, Part 215 (OMB A-110) and OMB A-102 as well as Title 28 CFR 70, 66, and 70.

#### Section C- Special Conditions

- History of effectively serving victims.
- Support from Non- Federal Sources.
- New programs with no history must show25% to 50% non-federal supporting funds.
- Public, Non-Profit, Tribal agency serving victims directly
- Will provide services at no charge through grant funded project.
- Following Federal and State environmental laws.
- o Collection and maintenance of demographic data when voluntarily provided by victims

- Assurance there will be no duplication of use of funds.
- Any computer network funded with federal funds must block all pornographic viewing
- Non –profits must make all financial statement available publicly online
- Funds may be withheld due to outstanding audit or investigation issues.
- Restriction of Non-Disclosure Agreements regarding the reporting of Fraud, Waste and Abuse of funds.
- Procurement Contracts and Simplified Acquisition Threshold

### D:2 Rape Crisis Counselor Mandate:

The Utah Office for Victims of Crime requires all non-profit organizations (501(c)3) receiving grant funding who provide rape crisis services to certify their compliance with the *Confidential Communications for Sexual Assault Act, Utah State Judicial Code 77*. All Sub grantee staff and volunteers who provide *direct services to victims of sexual violence must complete 40 hours of training in assisting victims of sexual assault*. Training to certify as a Rape Crisis Counselor must be provided by a Utah Rape Crisis Program or a State Sexual Assault Coalition.

#### D:3 Indirect Costs:

- Costs incurred solely as a result of incurring another cost that would not have been incurred if the other cost had not been incurred." OR These are costs that are directly associated to another cost. May Include:
  - Depreciation and Use Allowance,
  - Operational and Maintenance
  - General and Administrative
- What to Consider before taking Indirect Costs:
  - Reasonable and conforms to grant limitations
  - Consistent with both Federal and your Agency's policies and procedures.
  - Accordance with generally accepted accounting principles.
  - Not to be used to meet cost sharing or Matching requirements on any Federally financed project
  - Must be adequately Documented

#### D:3 Indirect Costs:

- De Minimus Rate: Subrecipients who have NEVER had a federally approved indirect cost rate agreement can request Indirect Costs associated with expanding Federal grant monies. Federal directive is to charge 10% of the modified Total Direct Costs (MTDC) associated with the grant. This rate must remain consistent for ALL federal awards held by an individual agency and must be consistently used for all federal awards until (if) a rate is negotiated.
- Federally Negotiated Rate: Determined by a Federal Cognizant Agency

## Section F (VOCA) Overview

- Volunteers
- Subgrant Award Report (SAR)
- Performance Metrics Platform (PMT)
- Compliance with Victims of Crime Act
  - O <a href="https://www.federalregister.gov/documents/2016/07/08/2016-16085/victims-of-crime-act-victim-assistance-program">https://www.federalregister.gov/documents/2016/07/08/2016-16085/victims-of-crime-act-victim-assistance-program</a>

# Section F (VAWA) Overview

- 1. VAWA 2013 Nondiscrimination condition
- Activities that compromise victim safety and recovery or undermine offender accountability
- 3. Publications disclaimer for STOP Formula Recipients
- 4. Match Requirement
- 5. Requirements for Recipients Providing Legal Assistance
- 6. Categorical Exclusion
- 7. Court Administrative Policies and Practices
- 8. Conditions specific to government organizations

# CONFIDENTIALITY PROVISION

VAWA- 28 CFR 90.4 Violence Against Women: Grant Conditions

VOCA- 28 CFR 94.115 Non-Disclosure of confidential or private information

# CONFIDENTIALITY:

VOCA: 28 CFR 94.115



VAWA: 28 CFR 90.4



# I. General Information

# What is the UOVC Confidentiality Provision?



 Requires all subgrantees receiving UOVC funding to protect the confidentiality and privacy of persons to whom subgrantees are providing services.

 The Provision is designed to ensure the safety of adult, youth, and child victims of domestic violence, dating violence, sexual assault, and stalking.

# What does it mean to be "covered" by the UOVC Confidentiality Provision?

 Sub grantees "covered" by this provision may not disclose, reveal, or release personally identifying information or individual information collected in connections with services, requested, utilized, or denied through grantees' and subgrantees' programs, regardless of whether the information has been encoded, encrypted, hashed, or otherwise protected.

## What is "personally identifying information"?



- Information that may directly or indirectly identify that individual;
- Information that may disclose the location of that individual;
- Information such as name, address, other contact information;
- Information such as social security number, race, birth date, number of children;
- May also include information that is encoded, encrypted, hashed, or otherwise protected.

# Circumstances in which a sub grantee may share personally identifying information:

- (1) When the victim provides <u>written</u>, <u>informed</u>, and <u>reasonably time-limited consent</u> to the release of information ("a release");
- (2) When a statute compels that the information be released; or
- (3) When a court compels that the information be released.

\*If a statute or court compels the release of information, the sub grantee releasing the information must (1) make reasonable attempts to provide notice of the release to the affected victims and (2) take steps necessary to protect the privacy and safety of persons affected by the release.

### Requirement to Report Actual or Imminent Breach of PII

The recipient must have written procedures in place to respond in the event of an actual or imminent breach (as defined in OMB M-17-12) if it-1) creates, collects, uses, processes, stores maintains, disseminates, discloses, or disposes of personally identifiable information (PII) (as defined in 2 C.F.R. 200.79) within the scope of UOVC grant-funded program or activity, or 2)uses or operates a Federal information system (as defined in OMB Circular A-130).

The recipient's breach procedures must include a requirement to report actual or imminent breach of PII to a UOVC Program Manager no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.

# II. SCOPE OF THE PROVISION:

#### THE SCOPE:

 Subgrantees, MOU partners, and other partners are covered if they are receiving funds under the grant as subgrantees.

 Partners that do not receive UOVC funding are not covered by the Confidentiality Provision.

OVW, OVC, and UOVC encourages such partners to voluntarily "opt-in" to the requirement of the Provision; opting in is a best practice for keeping victims safe.

## What if the sub grantee is a large umbrella organization but only one division of the organization is providing grant-funded services?

- Under the Provision, the division of the organization that is providing grant-funded services MAY NOT share personally identifying information with other divisions of the organization.
  - Example: An organization operates a domestic violence shelter, a counseling program, and a food bank. If a client comes to the domestic violence shelter, the shelter would need a release from the client before the shelter may contact the food bank on the client's behalf.

Can a victim services division or component of an organization, agency, or government share victim information with the leadership of the larger organization, agency, or government (e.g., executive director or chief executive)?

- In the absence of a statutory or court mandate or a release from the victim, the victim services division may only share identifying information about victims in extraordinary and rare circumstances. Such circumstances do not include routine monitoring or supervision.
  - Example: allegations of fraud against the victim services division or one of its staff members.

 The Provision applies to all operations of the victim service provided or victim services division/component, even if the VAWA funding is only for a small part of those operations.

• The Provision does <u>not</u> cover identifying information about offenders.

 SANE and SAFE programs are <u>not</u> covered under this Provision, however, they may be subject to other confidentiality provisions.

Victim-witness assistants at police departments and prosecutors' offices are not covered by the Provision because they are not providing "victim services" ...although the services they are providing help victims, they may also be required to assist with investigations and prosecution.

"Law enforcement and Prosecution – based advocates are considered "victim witness assistants" rather than victim services. So they can share information with the law enforcement or prosecution entity they work with. They should just be up front with the victims in terms of informing them that services are not confidential." Marni Shiels, Legal Counsel for VAWA

Note: This is the Office on Violence Against Women (OVW) interpretation of the Confidentiality Provision, in regards to persons funded with VAWA dollars. This does not apply to other Federal and State funding criteria.

# III. VICTIM RELEASES:

### Victim Release: criteria that releases must meet

Releases must be written, informed, reasonably time limited, and signed by the victim. Subgrantees cannot use a blanket release and must specify the scope and limited circumstances of any disclosure. (The same rules apply to VOCA confidentiality)

- At a minimum, sub grantees must:
  - Discuss with the victim why the information might be shared, who would have access to the information, and what information could be shared under the release;
  - Reach agreement with the victim about what information would be shared and with whom; and
  - Record the agreement about the scope of the release.

The release must specify the duration for which the information may be shared!

#### Victim Release, Cont'd:

- "Reasonably" time period will depend on the specific situation.
- Signing for a minor child both the minor and a parent or guardian must sign the release. Consent <u>may not</u> be given by the abuser of the minor. If the minor is incapable, the parent or guardian may consent on the minors behalf.
- Legally incapacitated person must be signed by the person's legally appointed guardian. Consent <u>may not</u> be given by the abuser of the legally incapacitated person.
- A sub grantee <u>may not require</u> a victim to sign a release as a condition of services. The release must be voluntary and fully informed.

#### Victim Release, Cont'd:

- In the case of telephonic services, such as a hotline call, is an oral release acceptable?
  - The statute DOES NOT allow for oral releases. A written release is required.
    - Option: have the victim remain on the call while a third party is contact, so the victim can provide his or her own information without the need for a release.
    - Option: have the victim email or fax a written release.

# IV. COURT AND STATUTORY MANDATES:

#### Court and Statutory Mandates:

 If the jurisdiction has a common-law duty to warn (i.e. courts have established through case law that certain professionals have a duty to warn others of specific, imminent danger), this would equate to a "court mandate" and thus allow for the release of information without the victim's consent.

 If the jurisdiction has a law allowing for a release in circumstances such as child abuse or clear and present danger, but does not require it, then the state or tribal law would NOT constitute a "statutory mandate" for purposes of the VAWA Confidentiality Provision and that jurisdiction could not release information without a signed, written, informed, and time-limited release from the victim.

# V. CONFIDENTIALITY ACKNOWLEDGMENT FORM:

### **Confidentiality Acknowledgment Form:**

All sub grantees are required to acknowledge that they are aware of the confidentiality requirements imposed by this Provision.

All authorized representatives with UOVC funding must sign the form as part of their grant conditions.

https://www.justice.gov/sites/default/files/ovw/pages/attachments/2015/01/20/confidentiality\_acknowledgement\_form\_42015.pdf

#### **Additional Material:**

#### Confidentiality Acknowledgement Form

 https://www.justice.gov/sites/default/files/ovw/pages/attac hments/2015/01/20/confidentiality\_acknowledgement\_for m\_42015.pdf

#### FAQ on the VAWA Confidentiality Provision

https://www.justice.gov/ovw/page/file/1006896/download

#### 28 CFR 94.115 Non-disclosure of confidential or private information

 https://www.govregs.com/regulations/expand/title28\_chapt erl part94\_subpartB\_subjgrp28\_section94.115#title28\_chap terl\_part94\_subpartB\_subjgrp28\_section94.115

28 CFR 90.4

https://www.govregs.com/regulations/28/90.4

#### PROGRAM REPORTING



#### **GRANT REPORTING TIMELINES**

Report Type	Where Submitted	<u>Deadline</u>	Applicable Grants
SAR (Subgrantee Award Report)	OVC PMT Website	Entered annually by September 30 <sup>th</sup>	VOCA
Subgrantee Federal Data Report	OVC PMT Website	October 30 <sup>th</sup> , January 30 <sup>th</sup> , April 30 <sup>th</sup> , July 30 <sup>th</sup>	VOCA
Quarterly SUCCESS Report	Utah Grants Management System	October 30 <sup>th</sup> , January 30 <sup>th</sup> , April 30 <sup>th</sup> , July 30 <sup>th</sup>	VOCA, VAWA, SASP
Financial Status Report (Reimbursement Request-can be done monthly or quarterly)	Grants Management System	October 30 <sup>th</sup> , January 30 <sup>th</sup> , April 30 <sup>th</sup> , July 30 <sup>th</sup> *VOCA closeout-July 15 <sup>th</sup> *VAWA/SASP closeout-January 15 <sup>th</sup>	VOCA, VAWA, SASP
Muskie Report	Email to Grant Manager	Annually by January 31st	VAWA & SASP

- Certified Assurances Section B: 2
  - Reports The grantee shall submit, at such times and in such form as may be prescribed, such reports as the Utah Office for Victims of Crime may reasonably require, including at least four (4) quarterly financial and progress reports, and final financial and narrative reports. Quarterly financial and progress reports shall be received no later than 30 days after each quarter ends. Quarter ending dates: March 31, June 30, September 30, and December 31. ANNUAL Reports must be received no later than 30 days after the ending date of the project.
- This is a report of your grant Program Plan's goals and objectives. This provides the opportunity to:
  - Show the accomplishments made in serving victims
  - Evaluate processes to ensure the program will meet objectives by the end of the year
  - Provide feedback to UOVC on program setbacks or gaps in services

#### Quantitative Data

- Each quarter's data should reflect the same type of measurement indicated in the original program plan:
  - Number of Victims
  - Number of Services
  - Number of Groups

#### Qualitative Data

- This is an opportunity for you to show us the meaning behind the work you are doing. These narratives could include:
  - A description of how an objective was completed
  - Information about objectives being higher or lower than anticipated
  - Small success stories
  - Information on gaps in services that were identified in the quarter

#### What Happens with Success Report DATA

- O Reports are reviewed by UOVC Program Managers and Grant Analysts to track individual program progress and understand what service trends are happening across the state.
- Success reports may be references when an agency makes a request for increase in funding and when determining funding for future grant applications.

#### Frequently Asked Questions

- Program plans can not be amended during the grant year. This can only happen at the time of the application or during the revision process.
- Occasionally agencies may experience a major change that will not allow an objective to be met. Always consult with your grant analyst first, but in most cases you can provide an alternative measured service during the next quarters report.
- We do not expect that every objective will have a full narrative each quarter and do request as much meaningful information as you can provide.

**Entering Quarterly Progress Reports** 

#### **SAR/PMT REPORTS**

#### Subgrantee Award Report (SAR)

- One SAR for each <u>VOCA grant</u>
- Should be completed after grant analyst has created it and contacted you
- General information about the grant and the services it provides

#### Subgrantee Data Report (PMT)

- One Data Report per <u>agency</u> (each grant's data should be combine into one report)
- Can enter in up to 30 days after each quarter
  - First report will be due October 30th for the July to September time period
- Reports performance measures of how the grant has been utilized over the last quarter
- Both reports are submitted via the Office for Victims of Crime's (OVC) website: <a href="https://www.ovcpmt.org">https://www.ovcpmt.org</a>
  - Each subgrantee will receive an invitation via email with information on how to create an account

#### SUBGRANT AWARD REPORT (SAR)

- The SAR is a requirement for recipients that receive VOCA funding from the Office for Victims of Crime (OVC) to deliver victim assistance services.
- •The SAR is used to collect basic information on subgrantee recipients and the program activities that will be implemented with VOCA plus match funds.
- Grantees have 90 days to submit the SAR after the subaward's start date
- Sub-grantees need to complete a SAR for each subgrant award of VOCA funding

#### SUBGRANT AWARD REPORT (SAR)

- The report requires two levels of data:
  - Profile of the subgrantee recipient receiving VOCA funds
  - Information on the activities that the VOCA-funded subgrantee program will implement
- Questions #1 through #6 are answered by your grant analyst
- Questions #7 through #11 are answered by the Subgrantee.

#### SAR-STEP BY STEP

- #7 Subgrantee Agency Service Area (counties you serve)
- #8 Subaward Match (Value of in-kind and cash match in VOCA budget and in whole numbers, no decimals)
- #9 Use of VOCA and Match Funds (Select the service categories your VOCA funded program will provide)
- #10 Types of Victimizations (check all of the types of victimizations that your VOCA funded program will serve)
- #11 Budget and Staffing (this section will be about the financial support for all victim services your agency provides)

#### **SAR-STEP BY STEP**

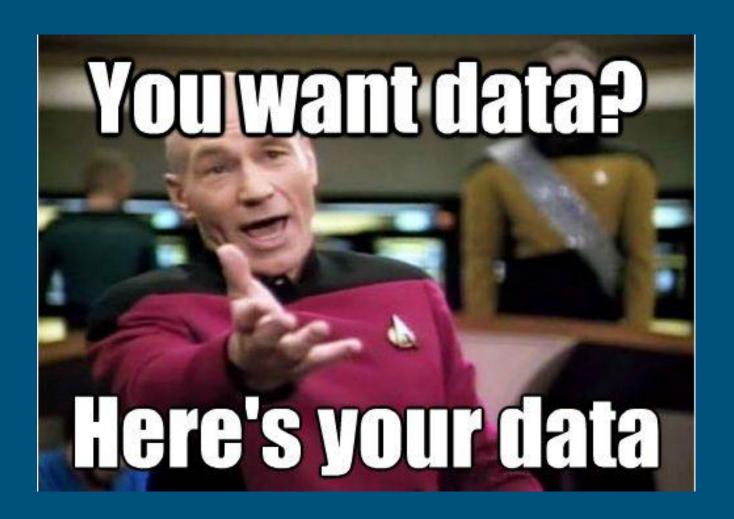
#### • #11 Budget and Staffing

- Indicate the fiscal year of your organization (if other, please define)
- Provide the total budget for all victimization programs/services for this subgrantee
- Identify by source the amount of funds allocated to the victimization programs/services budget of the subgrantee agency
  - State/Territory-State Government Funds
  - Local: funds obtained from sources that are described as county, municipal, local nonprofit, local group that raised money on behalf of your organization, etc.
  - Other Federal-Federal Government Funds
  - Other Non-Federal- non-local agencies that are not federal agencies, such as National Center for Victims of Crime or a national foundation
- Provide the total number of paid staff for all subgrantee victimization program and/or services (in whole numbers)
- Indicate the number of FTE hours staff funded through this project including the matched staff
- Indicate the number of volunteer hours support this work of this VOCA award

#### **SAR-WRAPPING UP**

- Once all of this information is entered in, please submit
- If there are no errors, your work is complete. If there are errors, you will need to correct them.
- The grant analyst will review your SAR for accuracy and may make changes and do a final approval
- The SAR has to be updated if there are any financial increases or decreases to your grant throughout the grant period. These changes are made by your grant analyst and by you as well.

#### SUBGRANTEE DATA REPORT



- Data should be pulled from the work and victims served by the VOCA funded staff and VOCA match staff
- I. Population Demographics
- #1 Total number of individuals who received services during the reporting period
  - Count all individuals served by your organization with the use of VOCA plus match funds during the reporting period. This number should be an <u>unduplicated</u> count of people (both primary and secondary victims) served during a single reporting period, regardless of the number of services they received or victimization types with which they presented.

- #2 Is your agency able to track individuals throughout the Federal fiscal year?
  - Answer "yes" to this question if, during each quarter and from one quarter to the next throughout the Federal fiscal year (October-September) you will be able to identify individuals as either new or continuing since October
  - If you are able to report an unduplicated count of individuals served for some services but not others, please still check the box.
  - #3 Is your agency able to identify "new" individuals who did not receive services from your agency during the previous reporting period?
    - Answer "yes" to this question if your organization is able to track clients from one reporting period to the next even though you cannot track clients from the beginning to the end of the Federal fiscal year

- #4 Enter the number of NEW individuals who received services from your agency for the first time during the reporting period
  - Report the number of NEW individuals served by your organization with the use of VOCA plus match funds for the first time during the reporting period
  - This number should be an unduplicated count of NEW clients served during a single reporting period, regardless of the number of services they received or victimizations they reported.
  - For the first reporting period of each federal fiscal year (October through December), ALL
     clients should be counted as NEW to establish a baseline for that year

- #5 Demographics (for NEW individuals identified in Question 4)
  - Count each NEW individual in only one race/ ethnicity type as self-reported. Individuals who self-report in more than one race and/or ethnicity category should be counted in the multiple races category.
  - See Appendix A for definitions of the races/ ethnicities.
  - See definitions for "Not Reported" and "Not Tracked"
    - Identify the number of victims who <u>self-reported</u> as male, female, or other
    - Identify the number of victims who self-reported their age at the time of the crime
    - The total number of Question #5 should equal the total number of Question #4.

- #6 Types of Victimizations (for ALL individuals identified in Question 1)
  - Enter the count of individuals who received services based on each presenting victimization type during the reporting period.
  - An individual MAY be counted in more than one victimization type
  - An individual MAY NOT be counted more than once within the SAME victimization type
  - See Appendix B for definitions of each victimization type
  - #6B Of the individuals who received services, how many presented with more than one type of victimization during the reporting period?
  - #6C Special classifications of individuals (enter the number of individuals who self-identify in one or more of the categories)

#### • II. DIRECT SERVICES

- For these categories, please report data for all individuals served during this reporting period,
   regardless of if they were new or not
- #7 Number of individuals assisted with a victim compensation application during the reporting period
  - Count the number of individuals who received <u>any level of assistance</u> with completing a victim compensation application during the reporting period, even if they did not submit the application.
  - Simply providing an individual with an application does NOT qualify as assistance.

- #8 Select the types of services provided by your organization during the reporting period
  - Your selections must match those made in Question #9 "Use of VOCA and Match Funds," of your Subgrant Award Report (SAR)
  - Information and Referrals
  - Personal Advocacy/Accompaniment
  - Emotional Support or Safety Services
  - Shelter/Housing Services
  - Criminal/Civil Justice System Assistance

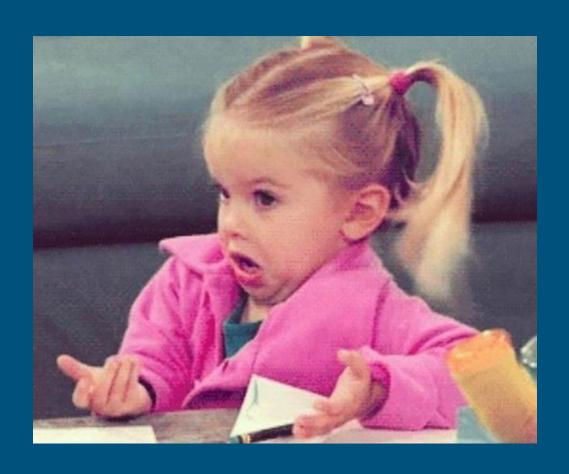
- #9 Total number of individuals who received services by service type AND number of times each service was provided during the reporting period
  - For each category enter the number of clients who received that service
  - For each sub-category, enter the number of occurrences that service was provided
  - Only count the services that you actually provided, not the ones you referred to be provided (except in information and referral)

- Subgrantee Annually Reported Outcomes
  - These questions will be asked once a year at the end of the 12-month period as of September 30
- #10 Number of Requests for services that were unmet because of organizational capacity issues
- #11 Does your organization formally survey clients for feedback on services received?
- #12 Number of surveys distributed (can be distributed by hand, mail, or other methods)
- #13 Number of surveys completed
- #14 Please discuss some of the challenges your victim assistance program faced during the course of the Federal fiscal year
- Fill out a narrative questions of challenges or gaps of services.

# QUESTION: UNDER DIRECT SERVICES, "LAW ENFORCEMENT INTERVIEW ADVOCACY/ACCOMPANIMENT" IS LISTED IN TWO CATEGORIES, "PERSONAL ADVOCACY/ACCOMPANIMENT" AND "CRIMINAL/CIVIL JUSTICE SYSTEM ASSISTANCE." SHOULD I REPORT DATA IN BOTH?

• Answer: No, the subgrantee should report on this service in only one category. Agencies must provide data only for the Direct Service categories they select; "Law enforcement interview advocacy/accompaniment" is listed in both categories so that agencies that provide only "Personal Advocacy/Accompaniment" but not "Criminal/Civil Justice System Assistance" (or vice versa) will have the opportunity to report on that specific service. If an agency provides both categories of service, it should report on "Law enforcement interview advocacy/accompaniment" only once, in whichever category best applies.

## HOW IN THE WORLD AM I GOING TO TRACK ALL OF THIS?!



- Question: How do we count secondary victims?
- Response: Secondary victims will no longer be counted separately from primary victims. They will be counted altogether.
- Question: Do we only count VOCA funded and matched staff?
- Response: Yes, you will only count the efforts of the VOCA funded and matched staff in accordance to their hours on the grant.

- Question: Under direct services "Law Enforcement Interview Advocacy/Accompaniment" is listed in two categories "Personal Advocacy/Accompaniment" and "Criminal/Civil Justice System System Assistance." Should I report in both?:
- Response: No, the subgrantee should report on this service in only one category. Agencies must provide data only for the Direct Service categories they select; "Law enforcement interview advocacy/accompaniment" is listed in both categories so that agencies that provide only "Personal Advocacy/Accompaniment" but not "Criminal/Civil Justice System Assistance" (or vice versa) will have the opportunity to report on that specific service. If an agency provides both categories of service, it should report on "Law enforcement interview advocacy/accompaniment" only once, in whichever category best applies.

- Question: How do I download this report?
- Response: You have received an electronic copy of the report via UOVC.
   However, the report needs to be filled out online at <a href="http://www.ovc.pmt.org">http://www.ovc.pmt.org</a> Your grant's point of contact will receive an email with a link to register your account with OVC PMT.
- Question: Will definitions for victimization types, services, etc., be provided?
- Response: Definitions and descriptions of race/ethnicity categories,
  victimization types, and general terms are available as an appendix to the
  Subgrantee Data Report. The services listed in the Direct Services category
  should be considered working definitions.

- Question: Can data be saved for partial data entry prior to submission?
- Response: Each data entry page will allow partial data entry to be saved, but the entire report must be complete before it is submitted to OVC.
- Question: To what extent should subgrantees expect future changes/modifications to data elements?
- Response: There will be changes made to the PMT system but we don't have an exact timeline of when OVC will make those changes.

## **Governing Body Report**

- Certified Assurances, Section B:3
  - Report to Governing Entity: The Subgrantee shall give two reports during the program year to the local, state, or non-profit governing entity (city council, county commission, board of directors) receiving the grant funds. The reports will include crime categories under which crime victims are served, types of services provided, and program accomplishments as described under contract Section E. Record of Providing Effective Services, Quarterly Progress reports and Annual Performance Reports. Grant-funded personnel shall participate in the report presentations. Quarterly progress reports must contain verification that reports have been made.
- Governing Body Report should be delivered by grant funded program staff
  - Types of crime victims and crime categories
  - Services Provided
  - Program accomplishments
- Reports should be attached under the Attachments Tab of your grant

## VAWA & SASP Annual Program Reporting

S.T.O.P. VAWA Measuring Effectiveness Initiative aka "The Muskie Report"

## The Muskie Report

- To meet this Congressional reporting requirement, OVW requires an Annual Progress Report for the STOP VAWA Grant.
- The Muskie School of Public Service developed the required report.
- Report submission:
  - STOP subgrantee
  - State STOP Administrator
  - Muskie VAWA MEI
  - OVW





## The Muskie Report

IT IS IMPERATIVE THAT DATA
BE COLLECTED THROUGHOUT
THE REPORTING PERIOD
IN ORDER FOR THIS REPORT
TO BE COMPLETED AT THE
END OF THE REPORTING
PERIOD.



2019 annual report for all subgrantees includes data from January – December 2019.

#### **How is the Data Used?**

- Grantee monitoring
- Fulfilling reporting requirements
- Biennial Reports to Congress
- Identifying trends, promising practices, and unmet needs.
- Performance measurement
- Special data reports

## The Muskie Report

- Be sure you are using the most current version of the report form; you can download from the Muskie site: <a href="https://www.vawamei.org/grant-program/stop-formula-grant-program/">https://www.vawamei.org/grant-program/</a>.
  - Annual Report Due Dates: For reporting period
     1/1/19 12/31/19, the report is due January 31, 2020.
- Only complete the section(s) based on the activities engaged in during the reporting period.
- Review PowerPoint and instructions. Use the icon in the report form.
- Use the "other" category only as a LAST resort; the description fit does not have to be perfect – if an existing category is similar, use that category.
- Use optional information sections to capture unique successes of your program, clarify data, provide more details.
- Do not use acronyms or abbreviations



## Who do I call for help:

 UOVC VAWA/SASP Grants Program Manager, Moriah Pease (801) 333-3521
 mpease@utah.gov

VAWA Measuring Effectiveness Initiative

(800) 922-VAWA

<u>vawamei@maine.edu</u>

<u>www.avwamei.org</u>



## Reimbursement Requests



July 1st marked the second year of a two year award.
Reminder: each year is a separate budget with a separate ledger and its own match.



#### What Can You Bill?

- VOCA Allowable
- On your grant
- Actual expenses not budgeted expenses
- This is a reimbursement grant, so expenses need to have already happened, can not pre pay
- Need to be able to provide back up documentation

\*\*\*Reimbursement requests have to be initially submitted within 30 days of the end of the Quarter except the last quarter it is due 15 days or July 15\*\*\*

#### On Your Grant

Reminder: your grant is a contract, therefore you can only bill for what has been approved on your budget.

Some common mistakes:

Billing for names of employees not on grant-if an employee that is on the grant leaves and the agency re hires for the position, you need to do an amendment to add the name of the new employee.

Billing for different pay rates than is on grant-you can either bill for the pay rate listed on the grant or at a rate that is lower than what is listed. You can not bill at a higher rate than what is on the grant.

Billing for more hours that has been approved on grant

Names and destinations of travel and training

Billing for supplies that are not on the grant

Billing over amount allowed per line item

#### **Notes on Personnel**

- Billing needs to equal actual work that was performed, not a percentage of the award.
- Need names on billing not just positions.
- Name of VOCA paid employee needs to match your activated/approved budget
- Overtime is not allowed unless it is on your approved budget
- Bonuses are not allowed
- Leave time: Leave hours can only be billed at the same rate as the hours allocated to the grant

#### Actual Expenses not Budget Amounts

#### Personnel

- Personnel Hours billed need to correspond with time on timesheets/pay stub.
- Can not increase hours to reflect differences in pay rate or pay outs.
   For example:
  - 1. if you want to give your VOCA funded employees a Christmas bonus (which is unallowable), you can not increase the number of hours being billed to reflect that bonus.

In a quarter a VOCA employee actually works 520 hours at \$20/hour for a total of \$10,400. During this quarter, the agency paid each employee a \$1000 bonus. To get reimbursed from the grant the finance person bills 570 hours at \$20 totaling \$11,400. This is not allowable, the finance person should only bill the 520 since that is the amount of time the employee ACTUALLY worked.

if you pay your employees a pay differential or overtime/on call hours
 (unallowable unless it is specifically written in your budget) due to a particular
 shift they work, you can not add hours to your billing to equal what was paid out.

A VOCA funded employee is approved at a pay rate of \$20/hour. During a quarter she works 480 hours at her normal rate of \$20. She also works 40 hours between the hours of midnight and 6 am which (according to her agency) allows her to make \$1/hour more. So during this quarter, the agency paid out a total of \$10,440

#### Benefits

#### Annually: you need to stay within the annual percentage on the grant

For example: if you are approved for 30% for a particular employee, but one month you have benefits that reach 50% where another month you may only have 20% (which means billing 30% would be overbilling for that month since you can't bill for more than was actually paid during any particular billing period.).

Per billing period: you must bill the % of benefits that is equal to or less than the % of hours billed to the grant in each billing period. For example: if the employer pays \$1000 in benefits for employee X, but only 50% of the employee's hours are billed to the grant, the agency can bill a maximum of \$500 of those benefits. You just have to be cautious not to exceed the % of hours billed to the grant in each billing period.

Same rules apply to those employees you are using for match (you can not bill for all benefit match at the beginning of year)

## **Notes on Travel/Training**



- Training needs to be in the grant year.
- Please check with your Grant Analyst on the training to ensure it is allowable before you
  make any arrangements
- Rental cars are usually only allowed if the hotel where the conference is being held is completely full
- UBER rides-generally to and from airport are allowed
- Watch per diem rates and hotel rates: Travelers may not demand a certain hotel. If they
  choose to stay at a hotel above per diem when there are hotels available in the area at the
  per diem rate, the traveler must pay the difference.
- Need receipts for everything but meals: includes checked luggage, parking at airport. All items need to be on grant.

#### Pre Pay Travel

Agencies who give employees per diem before they go:

Agencies will not get reimbursed until after the conference for per diems

If the employee does not attend the conference the agency can not get
reimbursed. This is true for conferences that are cancelled as well if individuals
fail to attend due to missing planes, etc.

If you pay for, get reimbursed for a conference you do not attend (for example, registration fees, flight) and you receive a refund you need to adjust your ledger for a credit

Agencies Need to use state per diem rates, unless they have their own written policy that has been submitted



#### Tips (Gratuity) for Transportation

#### Tips are allowable under VOCA provided:

- Organizations need to have a written policy and follow it, and amounts need to be reasonable
- If you are using the Utah State Travel Policy: Tips for taxi/shuttle/ground transportation may be reimbursed up to the greater of \$5.00 or 18% for each ride (Utah State Travel Policy, Revised 07/01/2019).\*
- Tips must be shown on original receipt.

\*This includes tips you use for UBER rides for victims, not just travel by employees



## **Emergency Funds**



- Food: emergency food for victims\*
- No food for trainings or employee lunches, includes volunteers
- No food for storage, such as, to have on hand for victims or for shelters, etc.
- No food for parties or holiday events (even if it is for victims)
- May not buy food with VOCA, VAWA and SASP Funds
- Medical: only emergency medical allowed, usually within 48 hours of crime
- Can use emergency funds for hotel and/or housing assistance

\*Can not feed police officers, other victim advocates, forensic interviewers, etc.

#### Gift Cards

- Receipt required for what was purchased with the gift card.
- All items purchased need to be VOCA allowable.
- Bill after gift card is redeemed, not when gift card is purchased.
- Should be tied to a specific victim.



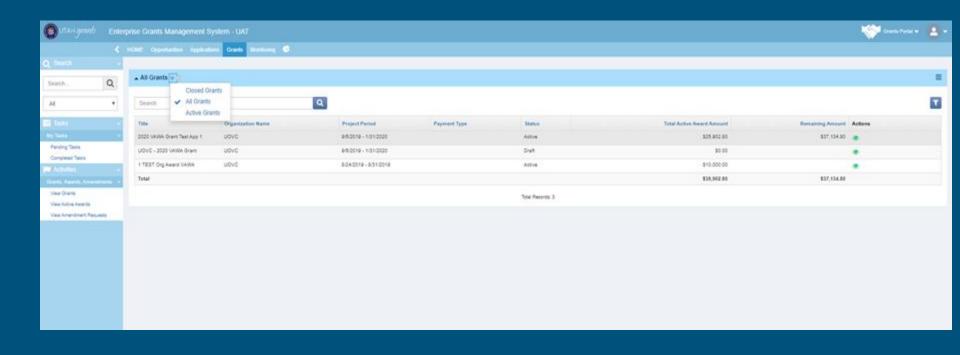


## **Housing Other Category**

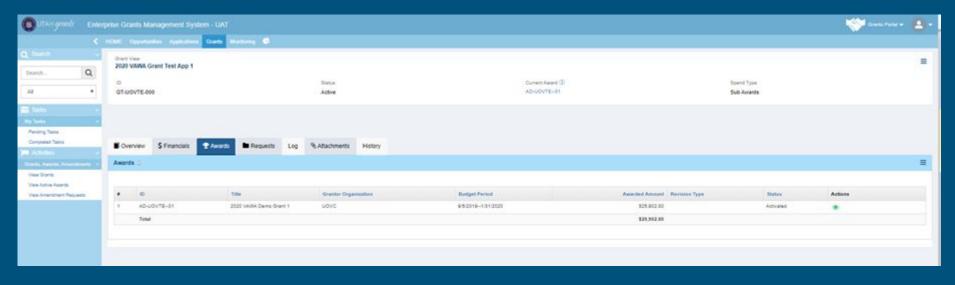
- Housing grant: will need to submit an itemized list of what items were purchased and the amounts of each item with every billing
- Not allowed: mortgage, any debt (no car payments), medical, food, any payment directly to victim, security deposits
- Is allowed: utility deposits, back rent or utilities (no fees), some car repairs
- Please call with requests you are unsure of before spending the money. There are no guarantees for reimbursement.
- Gift cards: need to have receipt for what was purchased with gift card. Reimburse when gift card is redeemed and needs to be spent within the grant cycle.
- If you don't have a housing grant you can pay for rental/direct aide items through emergency funds

#### Billing

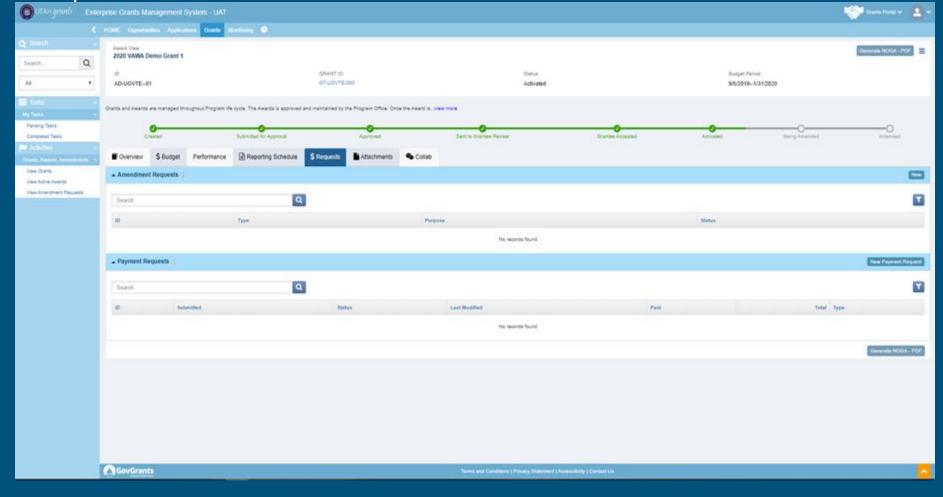
click on grants tab hit the eyeball to right of grant you want to bill



#### click the awards tab, then click the eyeball on the activated award



## click the requests button. Click the new payment request under payment requests



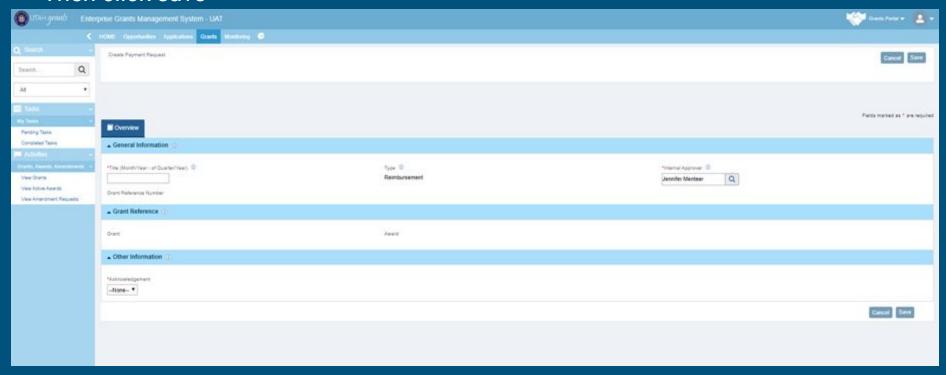
In the Overview tab:

Under title, put the quarter and year if billing quarterly or month and year if billing monthly.

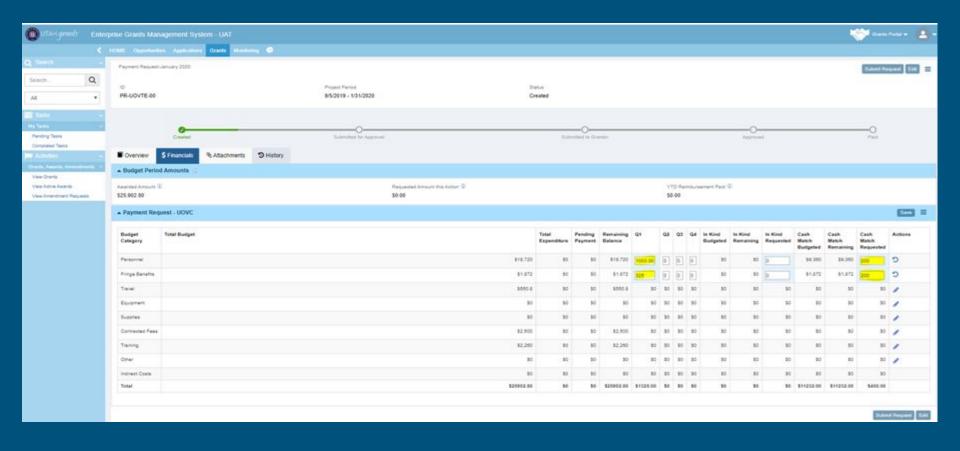
Internal approver is the second approver of payment. It will self populate, but you can manually change it by deleting the name and using search button to add name.

In the other information click I agree

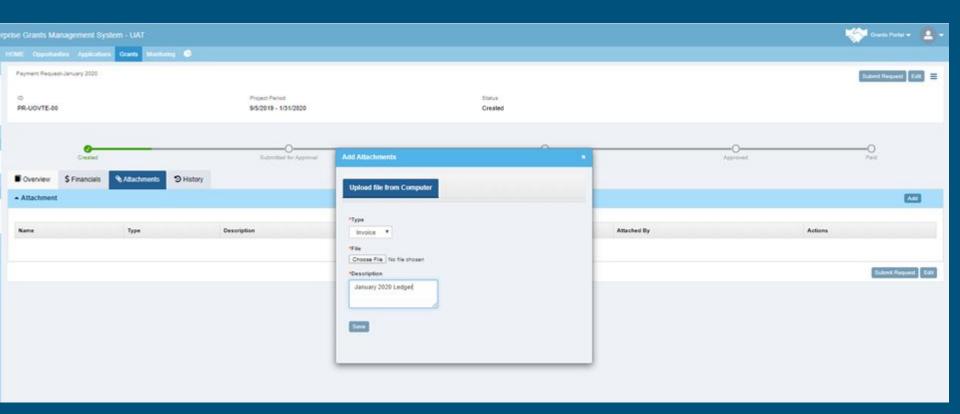
Then click save



click financials button
click the edit pen icon to enter expenditures
Under the "Q" column input grant amounts.
Input in kind and cash match requested
All these amounts must equal your ledger.
Once you have entered all expenditures hit save.



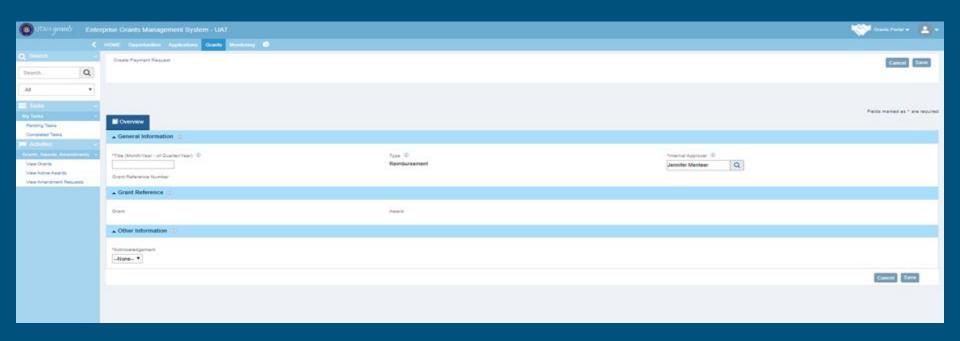
## Click attachments tab: upload ledger and match documentation after the documents have been attached hit save



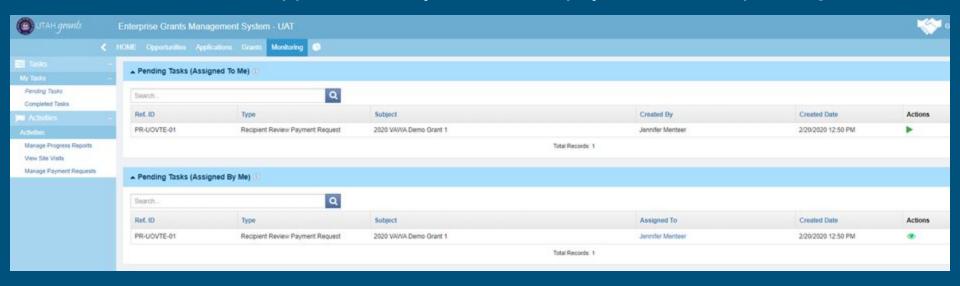
At this point the payment status will say submitted for approval.

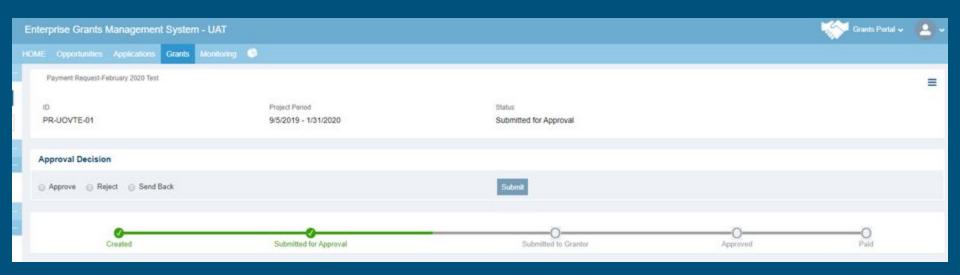
You are not finished yet, the payment needs to go through a second approver at your agency: this might be the same individual who initially submits the request or it could be another individual (this is dependent on how your agency has set it up).

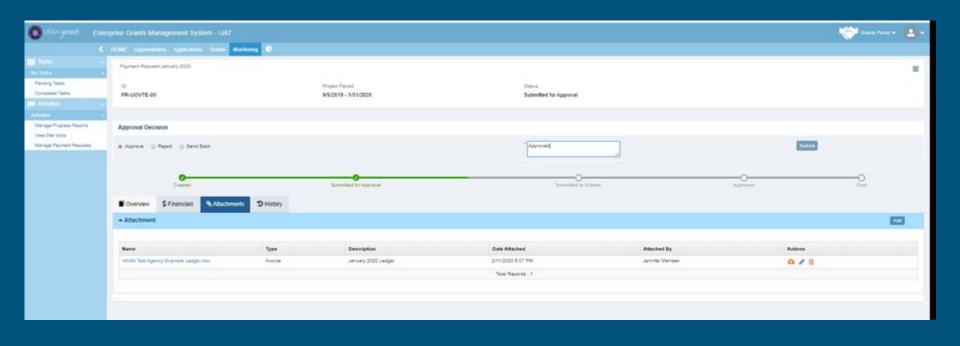
Hint: the second approver is the name of the person that was put in the internal approval box in the overview tab



#### whoever the second approval is they will see the payment in their pending tasks





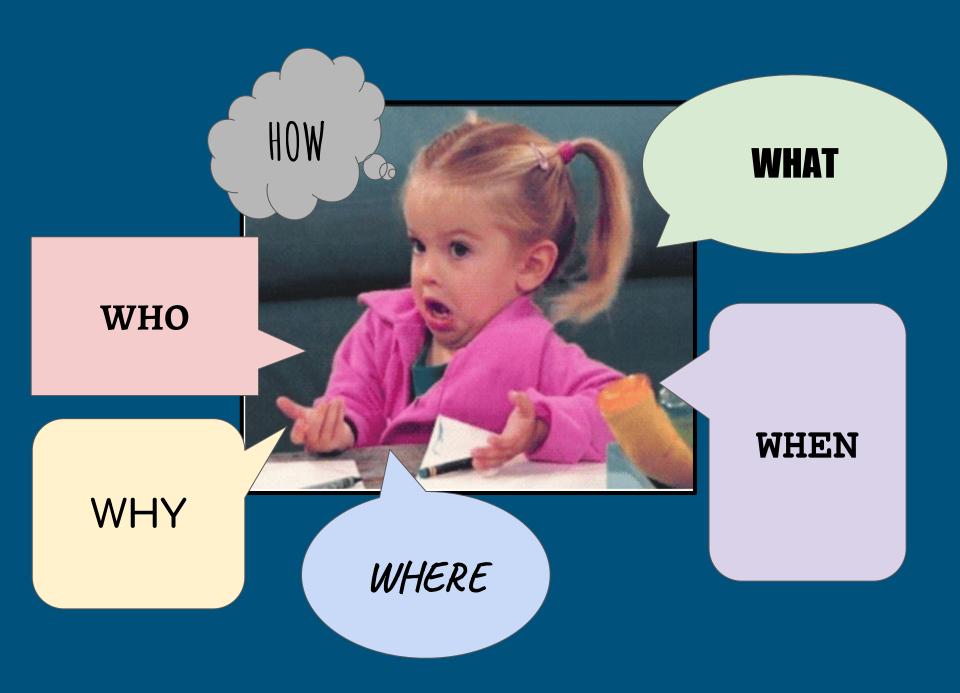


#### FINANCIAL STATUS REPORTS

- Need to use the most updated ledger to submit billing
- Needs to be the excel spreadsheet sent by your Grant Analyst: can not use google sheets
- Most Common Mistakes
  - The ledger does not match the financial status report
  - Expenses on the ledger do not match what is in the grant/contract
  - Amounts being billed exceed what is on the balance tab
  - Salary/benefits are entered into the incorrect categories
  - Incorrect ledger attached
  - Only zero's entered in on the ledger
  - Financial status report is not "submitted" -requires a second approval
  - Incorrect and/or not proper documentation for match
  - Match is not filled out in the financial status report

# **MATCH**



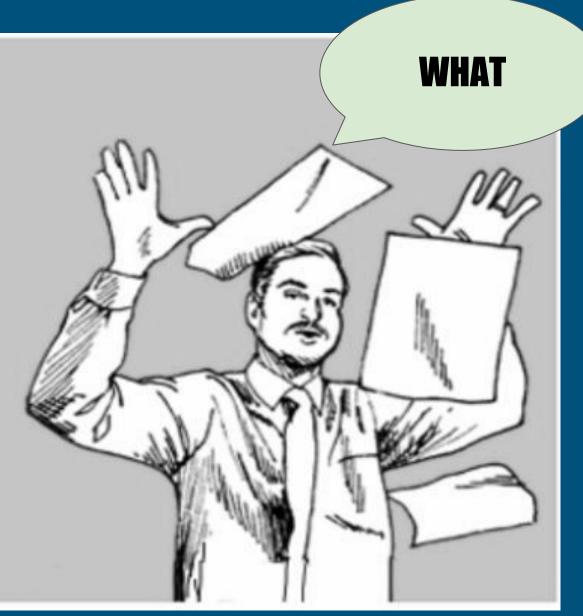


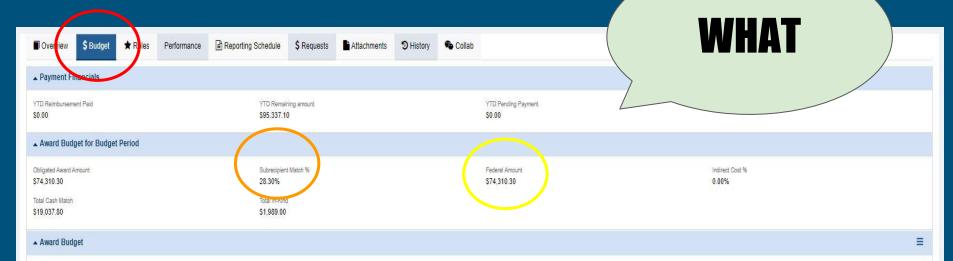


Native American Indian Tribes qualified under federal rule DO NOT need to provide match.

• In the approved budget

- VOCA/VAWA allowable
- Docs showing match paid or donated
- Direct relation to grant project
- No federal dollars





Suppo	ort Year	Budget Period Title	Start Date		End Date	
BP01		Fiscal Year(2019-2020)	07/01/2019		08/30/2020	
Prop	posed Uses of Total Funds Award Budget(9)					
#	Category Name	Grant	In-Kind match	Cash Match	Total Amount Actions	
1	Personnel	\$58,922.00	\$1,989.00	\$13,912.80	\$74,823.80	
2	Fringe Benefits	\$10,315.30	\$0.00	\$3,685.00	\$14,000.30	
3	Travel	\$80.00	\$0.00	\$0.00	\$80.00	
4	Equipment	\$0.00	\$0.00	\$0.00	\$0.00	
5	Supplies	\$527.00	\$0.00	\$1,440.00	\$1,967.00	
6	Contracted Fees	\$0.00	\$0.00	\$0.00	\$0.00 <b>Z</b>	
7	Training	\$4,486.00	\$0.00	\$0.00	\$4,486.00 🕜	
8	Other	\$0.00	\$0.00	\$0.00	so.oo 📝	
9	Indirect Costs	\$0.00	\$0.00	\$0.00	\$0.00	
	Total	\$74,310.30	\$1,989.00	\$19,037.80	\$95,337.10	



#### In kind Match



VS

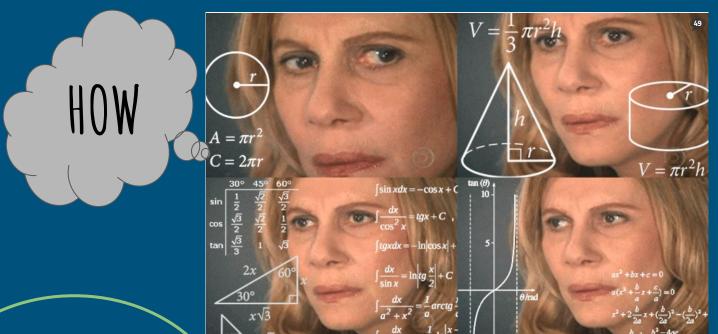
#### **Cash Match**





**Not a complete list:** Employee time sheets, pay stubs, payroll ledger, log of 5 W's of donation, volunteer time sheet with 5 W's, rental agreements, fair market value comps, ownership of building, invoices showing paid, agenda's, mile log, Kelly Blue Book or equivalent, car lease, receipts for travel, receipts for supplies, expenditure ledgers, invoices showing paid fringe, phone/utility receipts showing paid **ETC.** 

Match at beginning of grant will be different at end of grant unless don't change \$ amount and if spend every penny.



25%

Federal amount X .25 = match amount

\$80,000 X.25= \$20,000 So total award is \$100,000

# VOCA Only 20%

Fed amount + MATCH = total award \$80,000 +\$20,000 =\$100,000

#### **Example**

Spent \$75,689 x.25 = \$18,922.25

Need at least \$18,922.25 in match (in kind and/or cash)

#### **Example**

\$18,911 / \$79,643 =23% (would need 2% more match) \$79,643 + \$18,911=\$98,554 you'll see that \$18,911 / \$98,544 is only 19%



WHERE

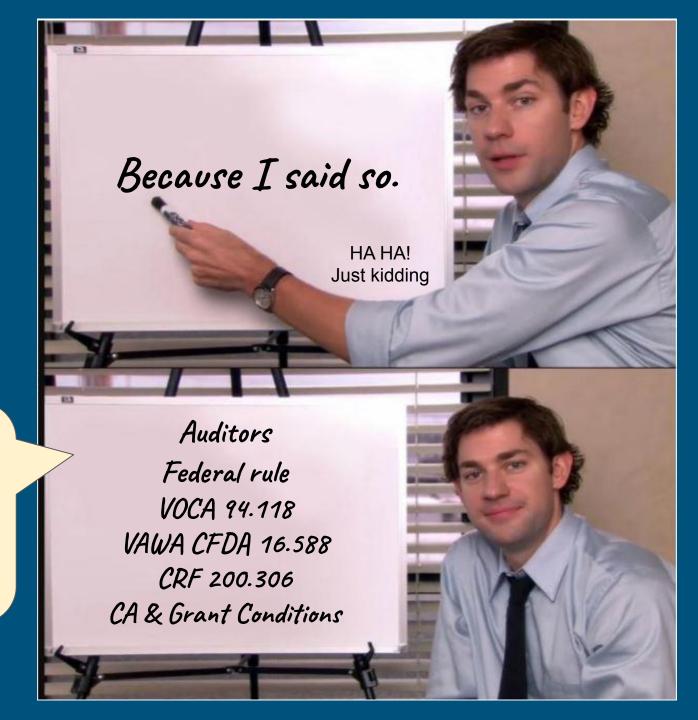
Must attach the UOVC Excel ledger.

Only attach match documentation.

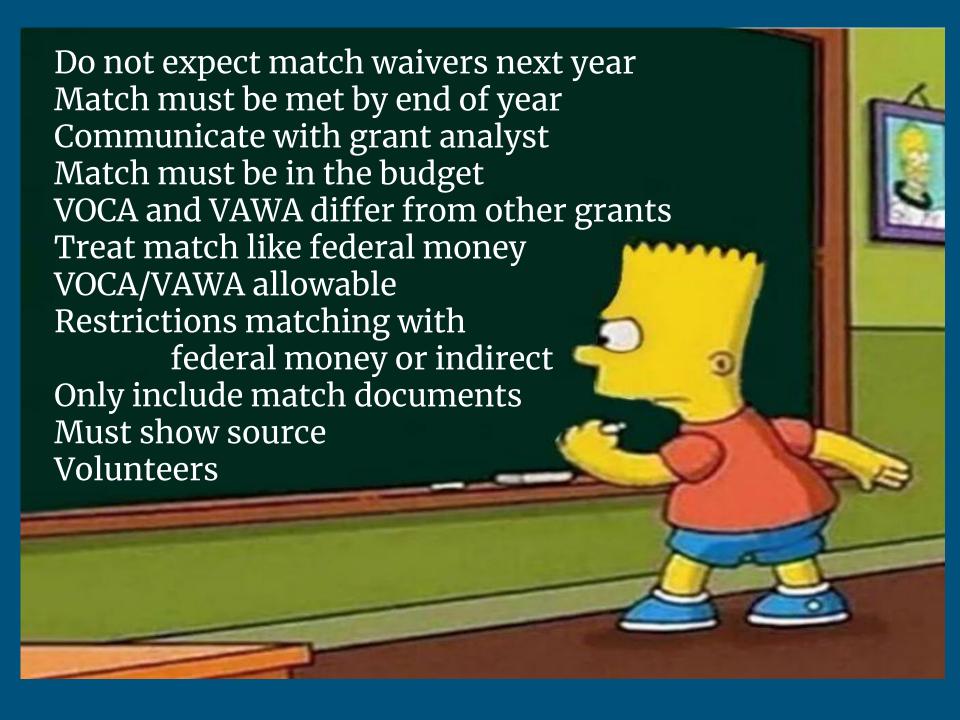
Do not attach Federal documentation unless asked to do so.

Docs must support the match listed on ledger.





WHY



# **EQUIPMENT TRACKING**

- Need to keep documentation of all equipment purchased on file for at least three years
- Need to keep documentation of when you get rid of equipment on file for at least three years
- You should not request the same equipment funded within the last three years without significant justification of why you need to replace it

# Allowable/Unallowable Costs

#### VOCA Allowable



Reasonable, necessary, allocable, allowable, consistent with federal/agency policy and procedure, documented, not being used as match for other federal grants.

Direct Services and activities supporting direct services to victims of crime

"Immediate emotional, psychological, and physical health and safety-services that respond to immediate needs of victims"

## VAWA Allowable



20 program purposes

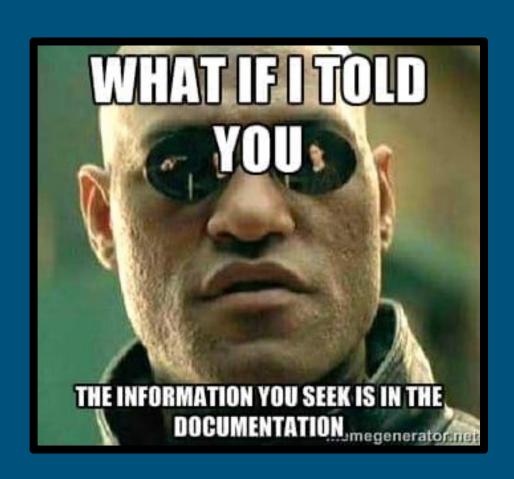
Comprehensive strategies address domestic violence. sexual assault, stalking & dating violence that are sensitive to the needs and safety of victims and hold offenders accountable for their crimes.

# Unallowable

This is not an exhaustive list, if you have any questions or concerns about what is unallowable, please ask before spending money reimbursement is not guaranteed.

- Lobbying
- Perpetrator Rehabilitation and counseling
- Research and Studies
- Criminal Justice System Improvement: this includes paying for expert witnesses
- Fundraising Activities: includes paying for an employees time if they are attending and working for the agency during a fundraiser.
- Capital Expenses
- Compensation for Victims of Crime: can not pay for items where a victim is getting CVR for the same item (can not double dip)
- Most Medical Costs: this includes prescriptions, corrective eyewear, hearing aids, etc.
- sending victims to conferences
- funding other organizations
- purchasing vehicles
- activities exclusively related to crime prevention
- debt
- fines and penalties, includes fees related to back rent, utilities, etc.
- food
- mortgage payments

Helpful Hint: bill what is already on your approved grant budget and ask before amending the grant.



#### **Certified Assurance B:12 Written Approval of Changes:**

Grantees must obtain prior written approval from the UOVC for major program changes. These include (a) change of substance in program activities, designs, or objectives; (b) changes in the project director or key professional personnel identified in the approved application; and (c) changes in the approved project budget.

#### **Certified Assurance B:35**

Grantee will plan and budget for equipment and supplies early in the grant project to ensure the full benefit of the purchase is received. Moving personnel, purchasing equipment and supplies, and requesting training funds during the last month of the grant may not be undertaken merely for the purpose of using available funds, as this does not support the purpose of the program.

- Change in Staff
- Change in POC or KPOC
  - Each staff must have own line item with correct number of hours worked within the grant year.
  - With any change in staff please provide a brief description of the new staff's ability to carry out the activities and expectations of the grant just as you do in your original grant application. A resume can be attached in place of the description.



- An agencies VOCA grant can only reimburse what is pre approved and listed on the budget:
  - Employee Names
  - Rates
  - Training Type
  - Supply Type
  - Type of Match
  - Total Line Item Amount

- Amendment Change Justification:
  - Clear explanation of what is changing in the grant
  - What is the reason for the change and why it is needed
  - Items that may be helpful to include as attachments:
    - Budget Justification Form
    - Training Agendas
    - Wage Comparisons
    - Community Surveys
    - Resumes
    - Agency Stats

- When approving requests for increases in funding, the following criteria will be taken into account:
  - Level of risk of the agency
  - Agency's ability to provide corresponding match
  - O Agency's ability to leverage other resources for additional funding
  - How the increase of funding will improve services to crime victims
  - One-time vs. ongoing funding
  - O Use of available funds within the current contract before increasing funds
  - Past performance reports and progress on goals/objectives

#### Common Issues to Avoid:

- Adjustment of previously expended match
- Amendment requests after unauthorized money has been spent
- Assuming approval before an amendment request is completed
- Requests to move excess funding into personnel
- Providing little or no justification
- Simultaneous Amendments & Payments
- Please Limit amendments to one per month.
- Amendment request within the last month of the grant cycle to move excess funding.
  - VAWA: Personnel changes ONLY during last quarter of grant. No other budget changes can be made.
  - VOCA: **Personnel changes ONLY** during **last month** of grant. No other budget changes can be made.

# **Grant Amendment Request**

How to Complete a Grant Amendment

## **GRANT MONITORING AND AUDITS**



## **INTRODUCTION TO AUDITS**

- Purpose of Auditing:
  - Assess compliance with Federal requirements
    - In-kind and cash match
    - Non-supplanting
    - Nondiscrimination and EEOP
    - Allowable/non-allowable costs
    - 2 CFR §200
  - Review of internal controls
  - Ensure sufficient supporting documentation for costs
  - Examine reports
  - Provide technical assistance

# Reporting Fraud, Waste, and Abuse

Certified Assurances A11 (A10 for VAWA). Reporting Potential Fraud, Waste, and Abuse, and Similar Misconduct, and;

 Any credible evidence that any person has submitted a claim that violates the False Claims Act or committed a criminal or civil violation related to fraud, conflict of interest, bribery, gratuity, or similar misconduct must be reported to the DOJ OIG and UOVC promptly



# Misuse of Funds

Certified Assurances A15. (A14 for VAWA) Misuse of Award Funds

- Misuse of award funds may result in a number of outcomes including:
  - suspension of current and future funds
  - suspension or debarment from federal grants
  - recoupment of money provided under an award
  - civil and/or criminal penalties

## **UOVC AUDITS**

- Minimum auditing activities:
  - Desk review annually
  - Site visit once every two years
- May increase the frequency and/or depth of audit depending on risk/need
- Auditors available by phone and email throughout the year



#### **Risk Assessments**

### High Risk

- What does high risk look like? 2 CFR 200.207
  - o grants with more money awarded
  - o new sub-grantee or new agencies
  - o issues managing the financial or programmatic aspects of grant
  - o desk review and/or audit findings
  - o staff turnover, or other recurring issues
- If determined high risk, comply with additional requirements 28 CFR 66.12
  - may require more project monitoring
  - o may require subgrantee to receive technical or management training
  - may require prior approvals for any change
  - o may be withheld from proceeding to next phase of grant
- If action is being taken due to the risk status subgrantees will be notified

Certified Assurances B32 (B30 for VAWA). High Risk Grantees

### **Risk Assessments**

#### Risk Assessment Tool

				Gr	antee Monitoring Risk As Administration	sessm	nent														
					Program																
					20XX																
Total Dollar Amount			Previous Grant Experience?		Financial and Compliance Monitoring	Frequent Turnover of Staff?		Other Issues of Noncompliance?		Financial Management Problems or Issues?		Significant Findings or Questioned Costs?		Recurring or Unresolved Issues?		Programmatic Noncompliance?	Desk Review Date	Submitted audit	Duns Number review	TOTAL RISK SCORE	
ľ	arge Medium mall		None 1-3 years 3+ years		No Single/No MDHHS Review A Single Audit, Not Major Program Single Audit & Major/MDHHS Re Y	Yes No	<b>^</b>	Yes No	^ >	Yes No		Yes No		Yes No	^	Yes ^ No				C	5
ľ	arge Medium mall	^	None 1-3 years 3+ years		No Single/No MDHHS Review A Single Audit, Not Major Program Single Audit & Major/MDHHS Re Y	Yes No	^	Yes No	<b>^</b>	Yes No	^	Yes No	<b>^</b> >	Yes No	<b>^</b> >	Yes A			(6)	C	)
ı	arge Medium mall	^ <b>&gt;</b>	None 1-3 years 3+ years		No Single/No MDHHS Review A Single Audit, Not Major Program Single Audit & Major/MDHHS Re Y	Yes No	<b>^</b>	Yes No	^	Yes No	^ ~	Yes No		Yes No	^ >	Yes A				C	)
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1	arge Medium mall	^ >	None 1-3 years 3+ years		No Single/No MDHHS Review A Single Audit, Not Major Program Single Audit & Major/MDHHS Re Y	Yes No	<b>^</b>	Yes No	^ >	Yes No	^ ~	Yes No	^ ~	Yes No		Yes A				C	)
Ī	arge	٨	None	٨	No Single/No MDHHS Review 🔥	Yes	٨	Yes	۸	Yes	٨	Yes	٨	Yes	۸	Yes A	33				1

### **UOVC AUDIT PROCEDURES**

#### Desk Reviews:

- Notification/entrance conference, typically around 30 days prior to submission deadline
- Request for supporting documentation, reports, etc.
  - Supporting documentation is documentation substantiating EVERY item billed on your ledger, including personnel costs and benefits, in-kind and cash match, etc.
- Auditor analysis
  - May include follow-up emails and calls
- Report draft/exit conference
  - Includes corrective action plan, if needed
- Submission of corrective action plan responses and corrected documentation
  - Includes a written formal response to the audit findings
  - Due approximately 3 weeks after receipt of draft report
- Finalization of report

### **UOVC AUDIT PROCEDURES**

- Site Visits:
  - Prior to site visit
    - Notification and scheduling
    - Request for supporting documentation, reports, etc.
    - Initial auditor analysis
  - During site visit
    - Entrance conference and discussion of initial auditor analysis
    - Tour of facilities and review of supplies/equipment billed to the grant
    - Interviews of grant-funded staff and volunteers
    - Auditor analysis
    - Exit conference
  - After site visit
    - Report draft, including corrective action plan if needed
    - Submission of corrective action plan responses and corrected documentation
    - Finalization of report

# Maintaining Records

#### Certified Assurances B11. Maintenance of Records

- All statistical records, supporting documents, and all other records pertinent to grants or contracts must be retained for three years after the completion of the project.
- We may request documentation to review prior years when we feel it is necessary

#### Certified Assurances A29 (A26 for VAWA). Monitoring and Evaluation

 You are assuring that that all accounting, auditing, monitoring, and evaluation records will be available for review.

## Releasing Information to UOVC

#### Certified Assurances B18. Release of Information

 All records, papers, and other documents kept by recipients of UOVC funds and their contractors, relating to the receipt and disposition of such funds, are required to be made available to the UOVC

#### Certified Assurances B9. Inspection and Audit

 The UOVC...or any of their duly authorized representatives shall have access for purpose of audit and examinations to any books, documents, papers, and records of the grantee, and to relevant books and records of grantees and contractors

### **FY20 AUDIT SUMMARY**

- Completed desk reviews of 154 grants/116 agencies as of August, 2020
- Total amount of VOCA adjustments/paybacks required: \$110,513.24



#### FY19&20 COMMON AUDIT FINDINGS

- Lack of supporting documentation
- Incorrect billings for personnel costs (salaries and benefits)
  - Inaccurate allocation of leave hours
  - O Billing a higher % to benefits than the % of hours billed
- Billing based on estimates (should bill on actual costs)
- Unallowable expenditures
  - Gift cards
  - Ineligible volunteer activities
  - Food and beverages
  - Cash to victims
- Inadequate match documentation
  - Vehicle and space costs most often incorrect
- Incorrectly filling out the ledger
- Inadequate/nonexistent policies and procedures
- Insufficient time and activity reporting (i.e. timesheets)

# Purchasing

Certified Assurances A30 (A27 for VAWA). Purchasing

- Must comply with your agencies policies regarding:
  - travel
  - o purchasing supplies and equipment
  - contractual agreements
  - personnel costs, including OT
- You must comply with your policies even if it means your cost is more than what the grant will reimburse.

# HOW TO HAVE A (RELATIVELY) PAIN-FREE AUDIT EXPERIENCE

- Ask questions
- Document, document, document!
- Keep a file that corresponds to each billing you submit that contains supporting documentation
- Read ALL of the grant terms, special conditions, and certified assurances
- Review 2 CFR §200
- Review DOJ Grants Financial Guide
- Self-audit



### **Desk Review Paybacks**

After Desk Review is complete you will receive a final letter which documents what needs to be "paid back" and in what categories.

Work with Grant Analyst to record the pay back on next billings

Paybacks need to be in the same category and be the same type. For example: if you overbilled in benefits you need to pay back in benefits.

match needs to be paid back in match (so be aware of making match requirements)

question about the amount? refer to auditors

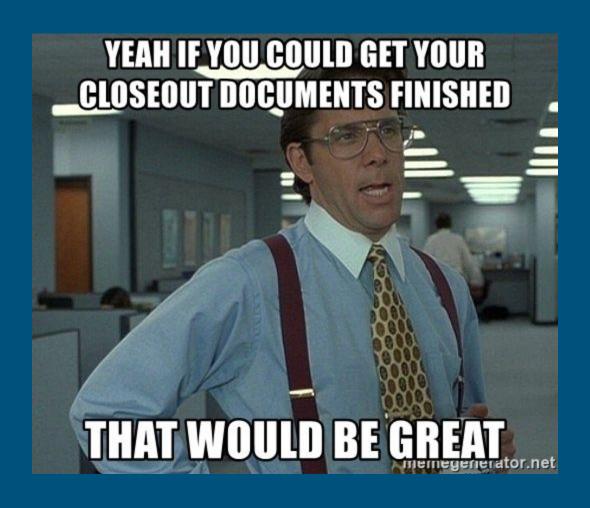
If you have to send in a check: separate check for each grant write grant number on check

### **UOVC**

Questions?



### **Grant Closeout**



- What <u>NOT</u> to do at the end of your grant:
  - Submit a grant change request for changes that occurred previously
  - Wait until the last minute to spend out your funds (including matched funds)
  - Change the scope of your program for the purpose of spending money

- What <u>NOT</u> to do at the end of your grant:
  - Submit grant change requests for the sole purpose of moving funds from one category to another in order to avoid deobligation
  - Submit a grant change request to move money in June (or during the 4th quarter for VAWA).
    - Amendments for personnel changes and match will be considered

- What <u>SHOULD</u> be done at the end of your grant:
  - Submit all financial status reports for the end of the year by the following deadline:
    - VOCA: July 15<sup>th</sup>
    - VAWA & SASP: Jan 15th
  - Ensure that all matches have been met
  - o Ensure paybacks are settled prior to submitting last billing

- What should be done at the end of your grant:
  - Submit your last quarterly progress report (SUCCESS) and PMT report by the following deadline:
    - VOCA: July 30<sup>th</sup>
    - VAWA & SASP: Jan 30th
  - Send a Deobligation Form for any unused funds to your grant manager
  - Closeout Grant in the Utah Grants system

# **Deobligation Form**



#### **Deobligation Form**

Agency Name:
Award Number:
Original Award Amount for 2019-2020: \$
How much are you deobligating this year? \_\\$
Total percentage of award deobligated:
Was your match met during 2019-2020?

# **Deobligation Form Con't**

\*If the <u>deobligation</u> amount is over 10% or \$20,000 of your total award, please answer the next questions. If it is not, please skip and have your program manager sign and return to UOVC.

Please provide a detailed explanation of what caused your agency to deobligate these grant funds.  Please include a breakdown of how much was deobligated per category:
What specific plans does your agency have in place to fully utilize all of your VOCA grant funding?
Date Program Manager
*Please note that excessive <u>deobligation</u> of your VOCA grant funding will place your agency in a high risk category and could potentially affect future funding decisions.

