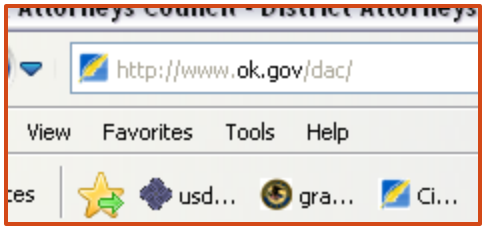
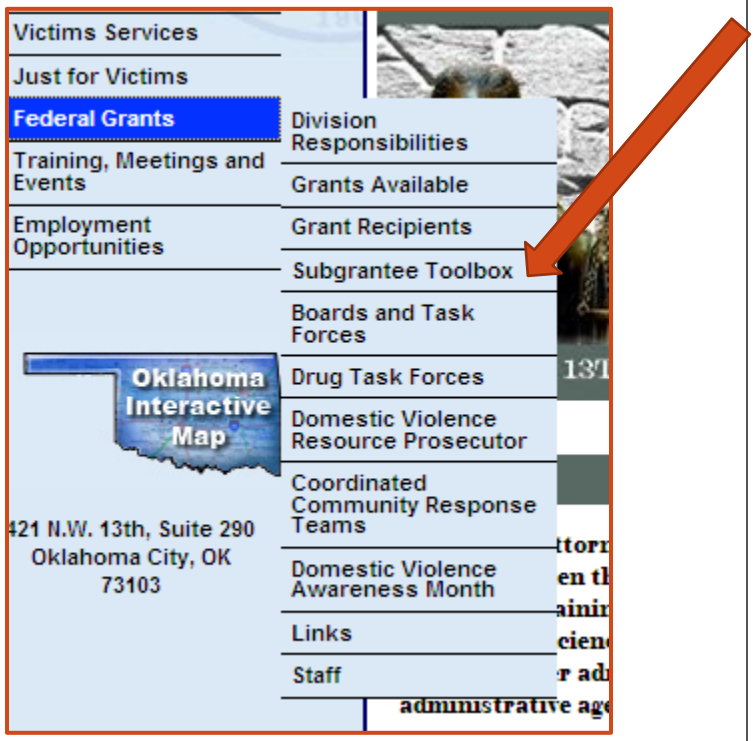
2015 VAWA/SASP Grants

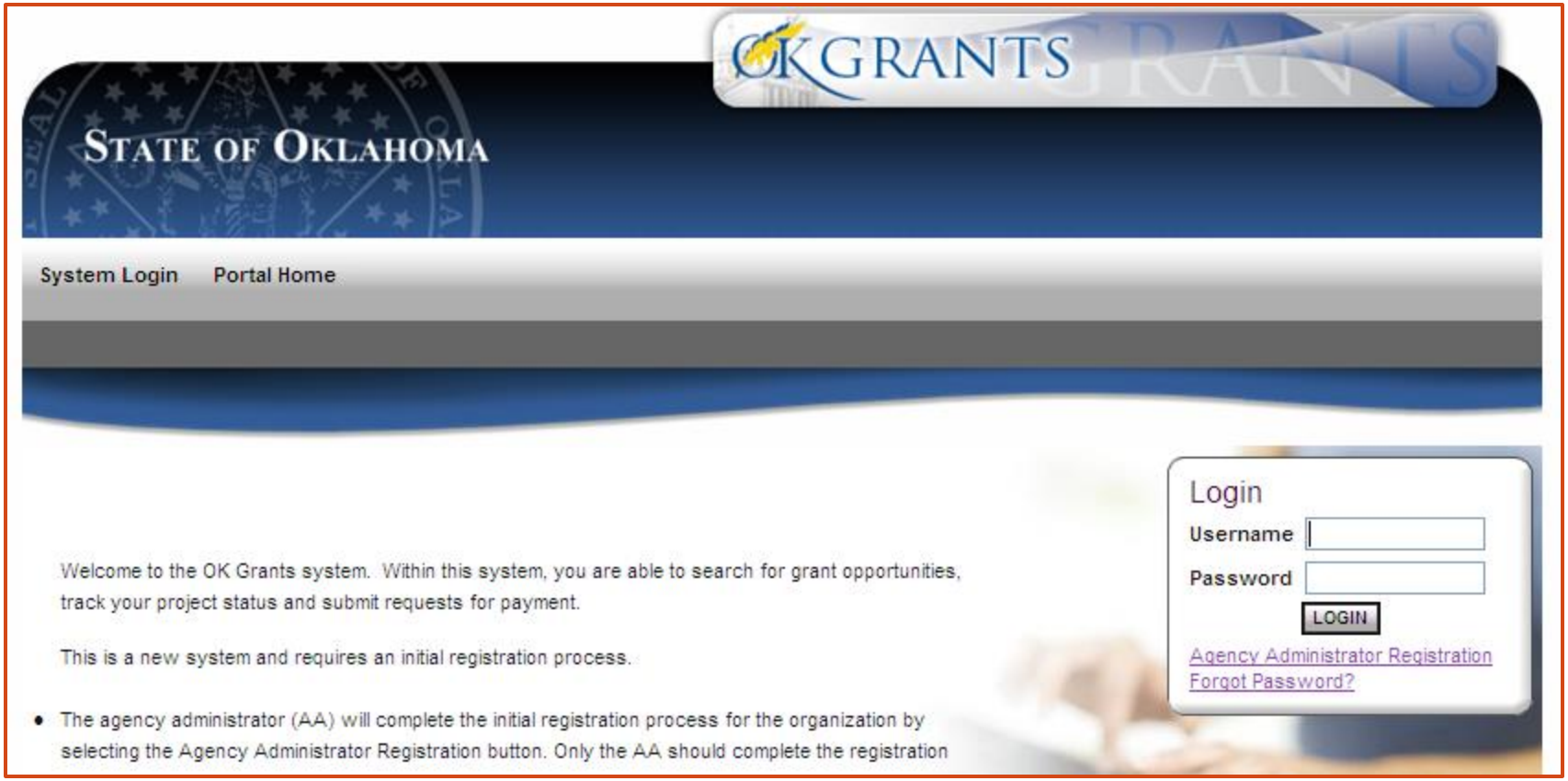
- DAC website:
  - www.ok.gov/dac



- Subgrantee Toolbox
  - Administrative Guides
  - Annual Reports & Plans
  - Grant Writing Tips
  - Other helpful links



DAC Federal Grants Division



- OKGrants website:
  - https://grants.ok.gov

DAC Federal Grants Division

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DAC Federal Grants Division

- Chief Executive Officer/Authorized Official
- Project Director/Agency Administrator
- Fiscal Officer
- PD and FO may NOT be the same person.
  - Check and balances
  - Chain of command
- Fiscal Officer is the person who ACTUALLY COMPLETES the financial reports and maintains the ledger.

Personnel Requirements

Award Packet How-To

- Agency Administrator (Project Director) can complete and save all forms.
- Financial Officer MUST complete the Accounting System Review.
- Authorized Official (CEO) MUST submit the packet.
- **START** with the Award Packet Instructions.

Award Packet How-To

- Budget Revisions
  - Please Review the Award Packet Instructions for specific directions on changes that need to be made on your budget.
- Goals and Objective Revisions
  - Please be sure to check the Goals, Objectives, and Activities Revisions page to determine whether or your changes must be made.

Award Packet How-To

- Use Print Award Packet link to print a complete set of award docs.
- Authorized Official (CEO) MUST submit the packet.
- Do **NOT** submit the packet until the Budget and Goals and Objectives pages are completed.
- Two options from here:
  - Grant Awarded
  - Modifications Required

Special Conditions

- CEO signature signifies willingness to abide by the rules.
- Individual Requirements
  - Goals and Objectives
  - Budget Specifics

Special Conditions- Continued

- Budget-
  - Must be used for the purposes identified in the application
  - Any changes must receive written approval.
  - Funds expended prior to written approval may be determined as unallowable.
- Victim Safety-
  - S.T.O.P. VAWA/SASP monies are not to be used for activities that may compromise victim safety.
    - Failure to respect victims autonomy and decision making
    - Forcing the victim to participate in criminal proceedings or testify
    - Requiring a victim to meet with a victim advocate

Special Conditions- Continued

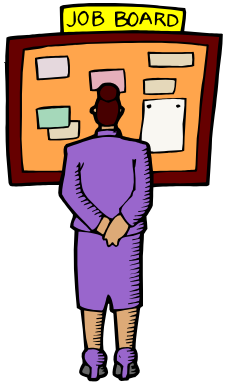
- Confidentiality-
  - May not disclose personally identifying information about victims served with OVW funds
  - This applies even if being requested for an OVW grant program or another Federal agency, State, Tribal or Territorial grant program.
  - Also limits disclosure by OVW subgrantees to OVW grantees
- Lobbying-
  - Funds cannot be used either directly or indirectly in support of the enactment, repeal, modification or adoption of any law, regulation or policy at any level of government without express written permission from OVW.

Special Conditions-Continued

- Fraud and Abuse
  - Each subgrantee is to promptly refer to an appropriate Inspector General any credible evidence that a principal, employee, agent, contractor, subgrantee, subcontractor, or other person has submitted false claim under the False Claims Act or has committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery or gratuity, or similar misconduct.
  - Misuse of grant funds may result in a range of penalties, including:
    - Suspension of current and future funds
    - Suspensions or debarment from federal grants
    - Recoupment of monies provided under a grant
    - Civil and/or criminal penalties

Special Conditions-Continued

- LEP
  - Must take reasonable steps to ensure LEP persons have meaningful access to the services under this grant program
- EEOP
  - If required, the subgrantee will submit an acceptable Equal Employment Opportunity Plan (EEOP) that is approved by the Office of Civil Rights within **45 days from the date of the award.**
  - Failure to do so may result in suspension or termination of funding.



Special Conditions- Continued

- Civil Rights-
  - It is the responsibility of a State Administering Agency to ensure that its subgrantees are complying with all applicable federal civil rights laws:
    - Title VI of the Civil Rights Act of 1964
    - Program Statutes (e.g., Safe Streets Act, Victims of Crime Act, JJDPA)
    - Section 504 of the Rehabilitation Act of 1973
    - Title II of the Americans with Disabilities Act of 1990
    - Age Discrimination Act of 1975
    - Title IX of the Education Amendments of 1972

Special Conditions-Continued

- Subgrantees will not pay consultants in excess of **$650** without prior OVW review and approval.
  - Requires a detailed justification submitted to OVW through DAC
- Subgrantee agrees that grant **funds** will **not** be **used** to conduct public **awareness** or community **education** campaigns or related activities.
- Grant funds may be **used** to support, inform, and **outreach to victims** about available services.
- Subgrantees will adopt and enforce policies **banning** employees from **texting** while operating any vehicle during the course of performing work funded by this grant.

Special Conditions- NEW

- The Violence Against Women Reauthorization Act of 2013 added a new civil rights provision that applies to all OVW grants issued in FY 2014 or after. This provision prohibits subgrantees from excluding, denying benefits to, or discriminating against any person on the basis of actual or perceived race, color, religion, national origin, sex, gender identity, sexual orientation, or disability in any program or activity funded in whole or in part by OVW. The subgrantee acknowledges that it will comply with this provision.

Special Conditions- NEW

- Non-disclosure agreements
  - Subgrantees and their subcontractors cannot require employees or contractors to sign an internal confidentiality agreement or statement that prohibits or otherwise restricts, or purports to prohibit or restrict, the reporting (in accordance with law) of waste, fraud, or abuse to any investigative or law enforcement representative of a federal department or agency authorized to receive such information.

Special Conditions- VAWA Specific

- Grant funds **cannot** be used to **support** the development or presentation of domestic violence, sexual assault, dating violence, and/or stalking **curriculum for primary or secondary schools.** Subgrantees agree that grant funds will not be used to teach primary or secondary students from already existing curriculum
- The subgrantee agrees that grant funds **will not** be used to support the **purchase of law enforcement equipment**, including uniforms, safety vests, shields, weapons, bullets, and armory
- The subgrantee agrees that grant funds **will not** be used to **support chemical dependency or alcohol abuse programs** that are not an integral part of a court-mandated batterer intervention program.

Special Conditions- VAWA Specific

- **Victim Services Only:** During the award period, the VAWA funded program must hold at least one outreach activity that targets the underserved populations in their service area.
- **Prosecution Only:** During the award period, VAWA funded prosecutors must hold at least one law enforcement training on the information and evidence needed from an investigation for a case to be accepted by the District Attorney's office.
- **Law Enforcement Only:** During the award period, VAWA funded law enforcement officers and investigators must meet with the local victim service agency no less than four times to coordinate services to victims.
- For programs funded in the **Victim Services, Culturally Specific Victim Services, Law Enforcement, and Prosecution** categories, if a CCR and/or SART Team is established in the community, VAWA funded personnel will participate in 75% of the team meetings.

Special Conditions-SASP Specific

- The subgrantee acknowledges that **funds** may **only** be **used** for the provision of **direct intervention** and related assistance to **victims** of **sexual violence**, including 24-hour crisis line services, medical and criminal justice/civil legal accompaniment, advocacy, and short term individual and group support counseling.
- Funds **cannot** be used towards **prevention education** efforts, projects focused on **training** allied professionals and/or communities, or the establishment or maintenance of **S**exual **A**ssault **R**esponse **T**eams.

Outreach vs Awareness/Education

- **Outreach** = telling the public and victims **WHAT** services your agency provides – like advertising.

- **Education** = telling the public **WHY** you have these services.

- **Prevention** = making suggestions to the public on **HOW** to prevent the **WHY** that leads to the **WHAT**.

Standard Assurances-Debarment

- If proceedings have been initiated, or **if** you have been **convicted** of, **indicted** for, either **criminally or civilly**, for **fraud, embezzlement, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property**, then you can be debarred.
- Debarment or suspension has a **government-wide effect.**
- Barred from receiving **ALL** federal funds

Standard Assurances-Drug Free

- As a subgrantee, you are required to maintain a drug-free workplace.
- A Drug-Free Workplace Policy **must be posted** in a location where all employees have access to it.

Award Documents

- The A-Team
  - Form A-4- Certification of Equal Employment Opportunity Plan
  - Form A-10- Statement of Audit Arrangements
  - Form A-12- Disclosure of Lobbying Activities
  - Form A-13-Certification of Project Income
- Others Forms
  - Special Conditions
  - Accounting System Review (Must be completed by Finance Officer)
- ***Require signatures and information!***

Financials

- Commingling is NOT allowed.
  - Grants must be accounted for separately from all other money.
  - Must have separate accounting ledgers that show the receipt and expenditures of grant funds
  - Must have general accounting ledgers that show grants funds tracked separately
- Supplanting is NOT allowed
  - What is it? Replacing state and local appropriated funds for a particular purpose with federal grants funds.
  - If you replace a grant funded position with a current employee, you must backfill their position.

Project Information

- Award Period
  - 1/1/2016 to 12/31/2016
- Do **NOT** expend funds before 1/1/2016.
- Expenditures **MUST** be encumbered, through a purchase order or some other means before 12/31/2016.
- You have 60 days past 12/31/2016 to pay for those encumbrances.

Project Information- Continued

- **REQUIRED** to be operational within 60 days of start date – March 1, 2016
- If there is a delay, you must send a letter to Stephanie Lowery, Director of Federal Programs, explaining the delay.
- If your project is not operational in 90 days, a second letter must be sent.
- May only use the funds for activities and purposes that were approved in the application and budget
  - Change in scope occurs when programmatic activities or budget deviates from approved application .
  - Change in scope of the project requires **prior approval.**

Programmatic Reports

- Programmatic reports are required for all grant projects.
- Track the progress and effectiveness of the grant program
- Two programmatic reports are required:
  - Muskie Reports (Federal)
  - S-2/V-2 Semi-Annual Progress Report (DAC)
- The beginning of the grant is the time to decide how you will collect and record the stats needed to complete these reports.

Muskie Report

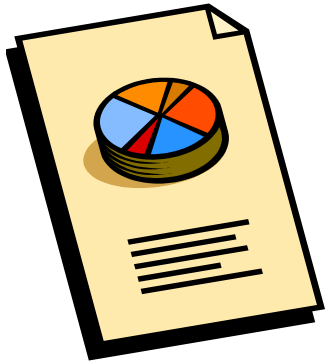
- Two kinds of information to track:
  - Items everyone must complete
  - Items that apply to your specific program
- **Reporting Period: 1/1/2016 to 12/31/2016**
- **Only** track statistics on the **GRANT-PAID** activities.
- Do **NOT** keep statistics for your entire agency for this report.
- Report will be e-mailed to you in December.
- Muskie Report Due
  - **January 31, 2017**
- There is a Muskie Database available – **FREE** – to assist in collecting statistics for this report.

Muskie Report-LAP

- LAP Crisis Calls MAY be included in your Muskie reports.
- When/How should LAP Crisis Calls be included in a Muskie Report?
  - If crisis intervention was provided over the phone.
  - Be sure to keep track of these calls and demographic information as appropriate.
  - Use narratives to explain any missing demographic information as high numbers of unknown demographics will result in red flags.

S-2/V-2 Semi-Annual Progress Report

- Collects status of goals and objectives
- Only collect information on grant-paid activities
- Report Dates:
  - 1/1/2016 to 6/30/2016 Due: July 31, 2016
  - 1/1/2016 to 12/31/2016 Due: January 31, 2017
- Form will available in OKGrants via Examine Related Items



Record Organization

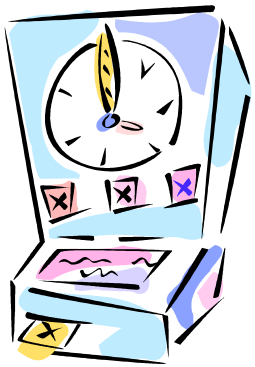
- The beginning of the grant is also the best time to decide how you will organize your grant records. Although the forms are electronic, you **MUST** keep a paper copy on file.
- Keep all records – fiscal and programmatic – in one accessible file or notebook.
- Grant records should be kept in one location.
- Use a 3-ring binder, records file, or a system of your choice.
- Example Tabs:
  - Application
  - Award Documents
  - Spreadsheets
  - A-3's
  - A-7's
  - Copies of checks, invoices, POs, and receipts
  - Correspondence

Claims

- All Grants are Reimbursement Only.
- Helpful Tips
  - Go by the check date especially if you are on a payroll system where payments are delayed.
  - Pay special attention to the beginning and end of the grant period as payments may need to be prorated especially for those paid biweekly.
- All VAWA and SASP funded employees must keep timesheets in line with financial guide requirements
- Employees working less than 100% of their time on VAWA/SASP funded activities must reconcile time.
  - If an employee is not 100% funded, their holiday, vacation, and sick days should be prorated accordingly.

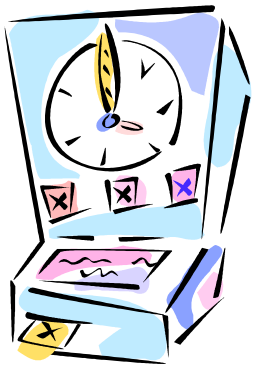
Expenditures- Personnel

- Only actual salaries, wages, and benefits may be paid with grant funds.
- Accurate time and attendance records are required for all personnel whose salary is charged to the project.
- Employees working less than 100% of their time on VAWA/SASP funded activities must track time separately and reconcile timesheets.
- If an employee is not 100% funded, their holiday, vacation, and sick days should be prorated accordingly.
- Agencies should reconcile at least quarterly.



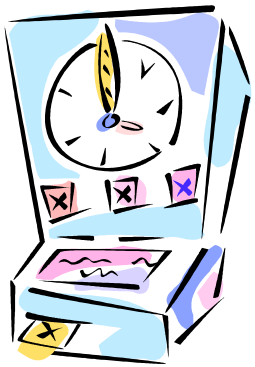
Expenditures- Personnel- Timesheets

- Timesheets by pay period are required to be maintained for all personnel whose salary is charged to the project.
- Timesheets should contain the following:
  - Date (day, month, and year)
  - Employee's name
  - Total daily hours, by day, charged to the project
  - Employee's signature
  - Project director or supervisor's signature



Expenditures- Certification

- If an employee is funded 100% with federal funding from a single grant during a six month period, a certification must be submitted to DAC.
  - The first certification should be submitted in July to account for January 1 to June 30.
  - If an employee works 100% of the time on VAWA or SASP activities but funding does not cover their full salary and benefits, they are not required to submit a certification.



Reconciling Time How-To

1. Determine total hours worked in the office. Holiday, Vacation, Sick Leave etc. should be removed.
2. Determine total hours worked on the respective grant.
3. Divide hours worked on the grant by total hours in the office.
4. Multiply this number by salary and benefits accordingly.

Reconciling Time How-To

- Example: Jane Doe works a 40 hour work week. She worked 20 hours on VAWA, 10 hours on Administrative items, used 5 hours of sick leave and 5 hours of vacation. Jane is paid $500 for every 40 hour work week.

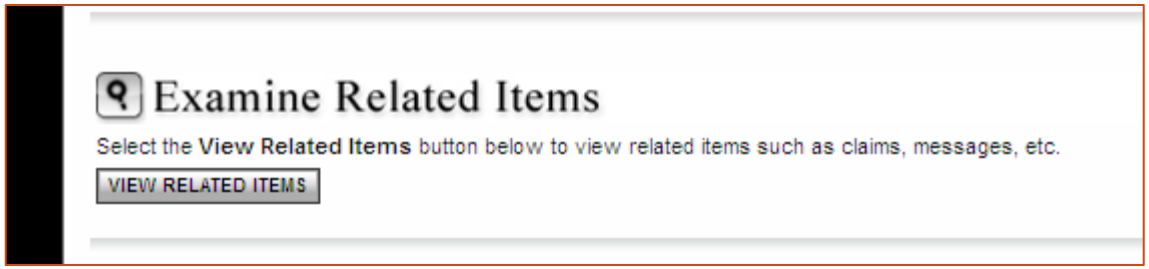
1. Determine total hours worked in the office. Holiday, Vacation, Sick Leave etc. should be removed.
   - Of the 40 hour work week, Jane used 10 hours in a leave category leaving a total of 30 hours worked in the office.
2. Determine total hours worked on the respective grant.
   - Jane worked 20 hours on VAWA.
3. Divide hours worked on the grant by total hours in the office.
   - VAWA/Total Hours Worked in Office= 20/30 = .67
4. Multiple this number by salary and benefits accordingly.
   - .67 x 500= 335. **$335 can be charged to VAWA for salary**

Expenditures

- Expenditures Requiring Prior Approval:
  - Equipment
  - Consultants
  - Out-of-state travel

- Non-Allowable Expenditures
  - Review Financial Guide
- If an expenditure is **NOT** in your approved budget categories, you **MUST** get prior approval.

- **Due by 11:59:59 PM on the 15th of EVERY month, even if you are not requesting funds**
  - The A-3 form is found in Examine Related Items



- **You MUST change the status of the form in order to officially submit the form. Saving the form does not mean it has been submitted.**

A-3 Request for Funds (Monthly)

- **EFT Payment Memo**
  - The same as the memo line on a check
  - DO NOT use any punctuation marks in the memo.

TOTAL	$28,877.50	$0	$0	$2,877.50	$28,877.5

EFT Payment Memo January SASP Draw Zero

I certify that the above figures are correct and accurate. Failure to provide correct and accurate

Carrie Good Carrie Good

- **Don't forget to SUBMIT the report!!**
  - **It is not turned in until the status is changed.**

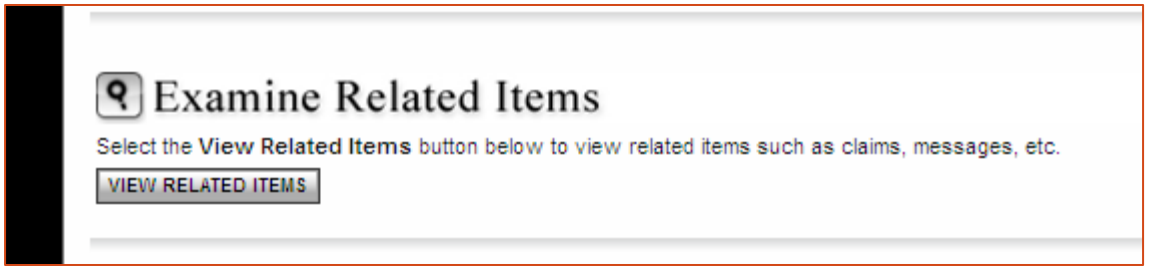
A-3 Request for Funds (Monthly)

A-3 Request for Funds Common Mistakes

- Transposing line items.
  - E.g. Salary and Benefits
- Selecting the wrong month from the drop down
  - You are always claiming a month behind.
- Selecting the wrong quarter/year
- Forgetting to apply the 'Financial Report Submitted' Status

- **Due by 11:59:59 PM on the following dates:**
- January through March **April 15, 2016**
- April through June **July 15, 2016**
- July through September **October 15, 2016**
- September through December **January 15, 2017**
- Final Report **April 15, 2017**
  - If funds are encumbered prior to 12/31/16 are paid after Jan. 1.

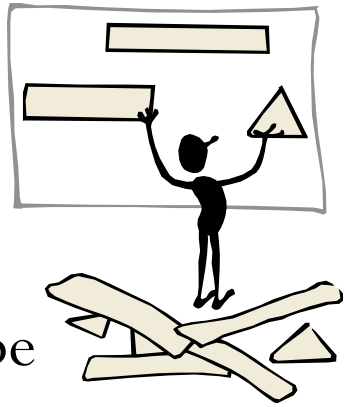
A-7 Quarterly Reports



- **Like the A-3, this form is found within Examine Related Items.**
- **You MUST change the status of the form in order to officially submit the form. Saving the form does not mean it has been submitted.**
- **This form will automatically fill based on the quarter selected. Please be sure to select the correct quarter/year.**
- **Your A-7 should be completed AFTER you complete the final A-3 for the respective quarter.**

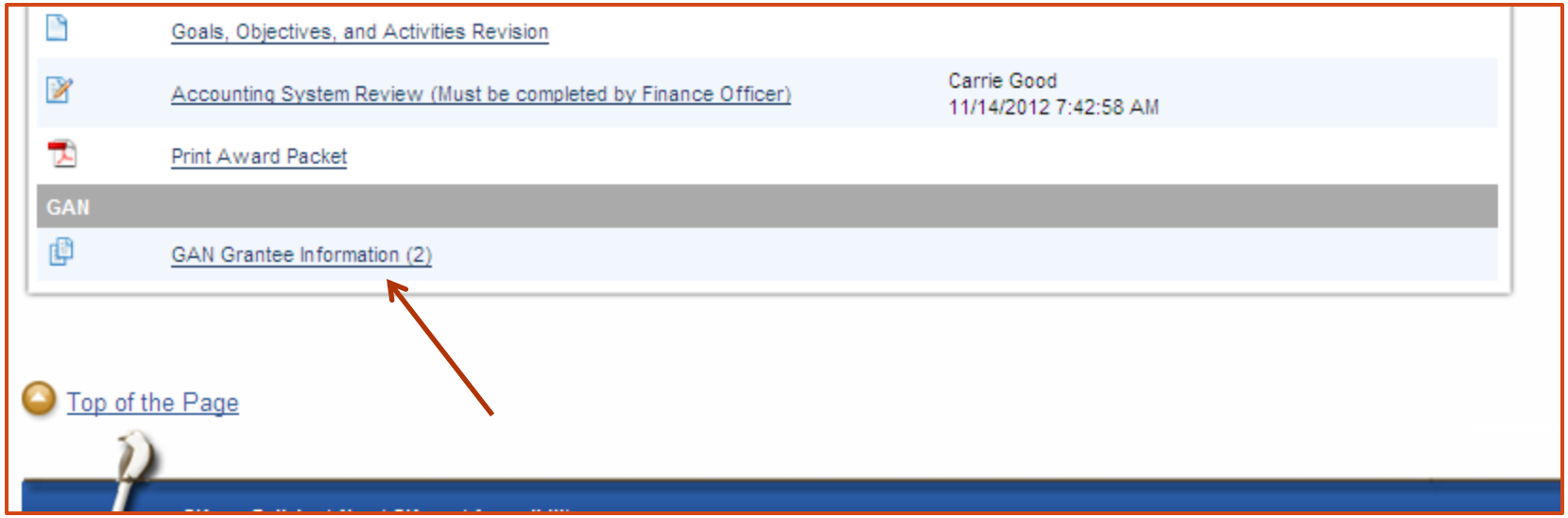
A-7 Quarterly Reports

Grant Changes



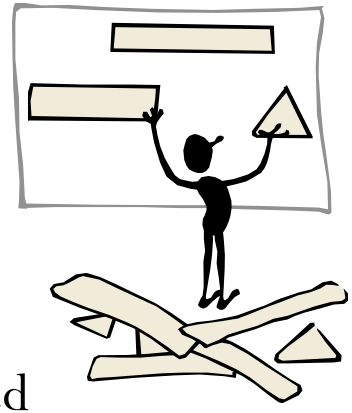
- Changes to your original grant application must be submitted via a Grant Adjustment Notice (GAN)
- Types of Changes Include:
  - Personnel
  - Budget
  - Scope
  - Project Period
- All GAN's MUST be approved by the Division Director before taking effect.
- Submission Deadline: **December 1, 2016**

- Personnel Changes
  - Change in PD or FO or CEO require the submission of a GAN
  - Changes to grant funded personnel should be submitted via email.



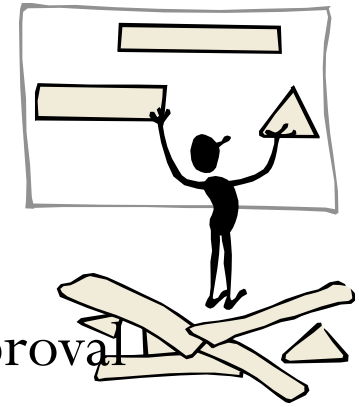
Personnel Changes

Budget Revisions



- Budget Revisions are possible
  - Less than 10% of the TOTAL award and within approved categories – no requirements
- More than 10% of the total award or outside of approved categories must get prior approval
  - Must submit a GAN
    - Provide new budget
    - Provide narrative
    - Provide explanation for the revision
- If the revision changes the scope of the project – it requires further approval .
- Submission Deadline: **December 1, 2016**

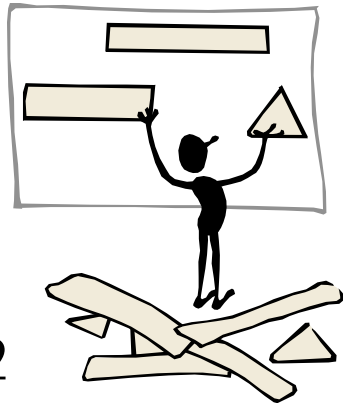
Scope Changes



- Scope Changes are possible but require prior approval
- In addition to the narratives required in the GAN, the following changes may also be required within the application:
  - Revised goals and objectives
  - Other relevant narratives
- Depending on timing, additional progress reports may also be required.

- Submission Deadline: **December 1, 2016**

Project Period Changes



- Project periods can be extended outside of the 12 month grant period.
- In addition to the GAN narratives, changes in the Project Period will result in the submission of the following:
  - Another S-2/V-2 for every 6 month period added to the initial 12 month project period
  - Another Muskie for each 12 month period added to the initial 12 month project period
- Submission Deadline: **December 1, 2016**

Site Visits

- Monitoring function
  - Assists subgrantees in implementing programs
  - Programmatic and fiscal accountability
  - Program Specialist required to visit 50% of all subgrantees.
- Who gets a visit:
  - New subgrantees
  - Any subgrantee who was not visited the previous year
  - High-risk subgrantees:
    - New PD or FO
    - More than two late reports
    - Failure to make progress on goals and objectives
    - Corrective actions in previous Site Visit

Site Visits- Continued

- Who must be present?
  - Project Director, Financial Officer, Grant Funded Staff
- Random or Scheduled?
  - Every site visit is pre-arranged and subgrantees will be provided with a pre-monitoring checklist to prepare.
- Strongly recommended that subgrantees are prepared
- Items that should be ready include: Grant Notebook, Award Documents, Financial Records, Drug-Free Workplace Policy, Updates on Goals and Objectives.

Compliance

- Compliance is **REQUIRED** throughout the grant from the award documents to the final close-out report.
- **What it means:**
  - **Following state and federal laws, rules, and regulations**
  - **Meeting ALL deadlines**
  - **Fiscal accountability**
  - **Achieving goals and objectives**

Draw Hold

- **Used** during the grant cycle to address **non-compliance**
- Used for **late** or **incorrect** programmatic and/or fiscal **reports**
- EXAMPLES:
  - Late or incorrect A-7
  - Failure to submit a Muskie or V-2/S-2 Report on time
  - Not responding to Corrective Actions from Site Visit Reports
  - Other times when needed
- **Drawdowns** are **not processed** when a DH is in place.
- **Repeated** Draw Holds are **bad**

Compliance Reports

- Used to look at the entire grant year
  - **Tie** back **to** the **high-risk** designation
- Compiled and **provided** to the **VAWA Board** when making **funding** decisions
- Report Contents:
  - Late/incorrect award documents
  - Late/incorrect A-3s and A-7s
  - Late/incorrect Muskie Reports or V-2/S-2 Reports
  - Corrective Actions
  - Draw Holds

Compliance Reports

- Good Things: Could receive waivers from future trainings
- Bad Things: Could have a negative impact on future funding and/or could result in the termination of your grant
- Warning Special Conditions
  - If you have three or more late/incorrect reports in a grant year, your next grant award will receive this Warning Special Condition.
  - The Warning Special Condition states that three or more late or incorrect reports on the new award will result in restrictions on your next grant award.
- Death Penalty
  - Once you have received the Warning – if, during the warning year, you have three or more late or incorrect reports, your next grant award will receive the Death Penalty.
  - The Death Penalty states that if you have two late/incorrect reports in the new grant year – your grant terminates immediately.

Close-Out

- If you have planned well from the beginning, the end should be fairly painless.
- Audits
  - If you expend more than $750,000 in federal awards (all sources) – your agency is required to do an A-133 audit.
  - If your agency does not, you still have to have records available if needed by officials.
  - Copies of audits should be submitted to DAC no later than 9 months after the close of the fiscal year.

Close-Out

- Lapsing funds
  - Any funds not obligated by the end of the project period and then drawn within the 60 days will be returned to DAC.
  - In order to use any of these funds outside of the initial 12 month grant period, an extension request must be submitted in the form of a Project Period GAN.
    - The deadline of extension requests is December 1, 2016.

https://grants.ok.gov

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