

# 2020/21 VAWA/SASP Grants

# Teleconference Information

All teleconference participants need to be muted. Please press \*6 on your phone to mute. Please reserve audio questions for the end of the presentation. If you would like to ask a question, please press \*6 on your phone to unmute yourself so you may ask your question. When finished, please press \*6 to re-mute your phone.

# DAC Federal Grants Division

- DAC website:
  - [www.ok.gov/dac](http://www.ok.gov/dac)
- Subgrantee Toolbox
  - Link to OKGrants and OKGrants Tips
  - Administrative Guides
  - Civil Rights Policies & Forms
  - Project forms
  - Annual Reports and Plans
  - Training Tips
  - Muskie Tips

The screenshot displays the website for the District Attorneys Council (DAC). At the top, there is a search bar with the text "Search Site" and a "GO" button. Below the search bar is a large group photo of the council members. The navigation menu includes "Home", "District Attorneys", "About the DAC", "Victims", "Grants", and "Training". The "Grants" menu is highlighted, and a dropdown menu is visible with the following items: "Division Responsibilities", "Grants Available", "OKGrants", "Grant Writing Training and Resources", "Grant Recipients", "Boards and Task Forces", "Subgrantee Toolbox", "Drug Task Forces", "Links", and "Staff". A red arrow points to the "Subgrantee Toolbox" item. Below the navigation menu, there is a "Message from the Executive Council" section featuring a photo of a man in a suit and a red tie, and a text block that begins with "The District Attorney's Office is the state agency that provides the state's 27 elected District Attorneys with the primary function of administering the justice system by providing professional support, administering claims to victims of crime, and offering financial and personnel duties to the Attorney General's office. By offering these services, the DAC is fulfilling its mission to provide the necessary tools for Oklahoma's prosecutors to protect the citizens of Oklahoma."

# DAC Federal Grants Division



The screenshot shows the OKGrants website interface. At the top, there is a banner with the Oklahoma state seal on the left and the 'OK GRANTS' logo on the right. Below the banner, there are navigation links for 'System Login' and 'Portal Home'. The main content area contains a welcome message and a login form. The welcome message states: 'Welcome to the OK Grants system. Within this system, you are able to search for grant opportunities, track your project status and submit requests for payment. This is a new system and requires an initial registration process.' Below this, a bullet point indicates that the agency administrator (AA) will complete the initial registration process. The login form includes fields for 'Username' and 'Password', a 'LOGIN' button, and links for 'Agency Administrator Registration' and 'Forgot Password?'.

STATE OF OKLAHOMA

OK GRANTS

System Login Portal Home

Welcome to the OK Grants system. Within this system, you are able to search for grant opportunities, track your project status and submit requests for payment.

This is a new system and requires an initial registration process.

- The agency administrator (AA) will complete the initial registration process for the organization by selecting the Agency Administrator Registration button. Only the AA should complete the registration

Login

Username

Password

[Agency Administrator Registration](#)

[Forgot Password?](#)

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

# DAC Federal Grants Division

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# DOJ Grants Financial Guide

It is imperative that the Project Director (PD) and the Financial Officer (FO) be familiar with the Department of Justice Federal Financial Guide.

## DOJ Federal Financial Guide

The guide can be found at:

<https://www.justice.gov/ovw/file/1030311/download>

This guide applies to all DOJ grants, and each grant could have additional considerations according to the award.

DAC is currently updating their internal financial guides and these will be emailed to you when completed.

# VAWA and SASP Awards

## VAWA:

39 Subgrantees

Total Amount: \$3,960,945.83

## SASP:

7 Subgrantees

Total Amount: \$509,231.95

# VAWA Allowable Expenditures

- Projects that serve or focus on adult and youth (age 11 – 24) victims of domestic violence, dating violence, sexual assault, or stalking, including male victims.
- Support services for secondary victims such as children who witness domestic violence.
- Programs that address sexual assault against men, women, and youth in correctional settings as long as they address the domestic violence, dating violence, sexual assault, or stalking experienced by the incarcerated individual, including crimes experienced while incarcerated and crimes experienced at other points in their youth and adult lives.
- Legal services such as housing, family law, public benefits, etc.
- Transportation costs that would enhance a victim's safety
- Batterers Intervention Programs as long as the programs use court monitoring to hold offenders accountable
- Prevention programs such as media campaigns to educate the general public about violence against women. No more than 5% of the state's total STOP award for the year may be used for this purpose.
- Programs in schools as long as they fit within one or more the STOP Program's statutory program purpose areas.

## VAWA Allowable Expenditures – Cont.

- Health care providers' time conducting forensic exams as long as the exams are performed by specially trained examiners such as SANEs and the jurisdiction does not require the victims of sexual assault to seek reimbursement from their insurance carriers.
- Substance abuse counseling to victims with substance abuse issues
- Alternative treatments for victims providing the subgrantee provides specific justification for the type of approach, such as research on the benefits of the specific type of treatment to domestic violence or sexual assault survivors. There would also need to be justification that the cost of service was reasonable.
- Supervised visitation and exchange by and between parents in cases involving domestic violence, dating violence, sexual assault, and stalking.
- Food costs are permissible if the food is necessary or integral to providing services to victims to enhance their safety such as food in shelters or groceries for victims. (does not include alcohol, tobacco, or related products)
- Salaries and benefits for prosecutors, law enforcement officers, or judges providing they are handling cases involving violence against women. If they are not working full time on violence against women cases, their time must be prorated.
- Operational costs of a facility such as a shelter

## **VAWA Allowable Expenditures – Cont.**

- Provide a stipend intended to reimburse victims for their costs in attending focus groups, such as mileage, gas, childcare, etc.
- First month's rent as part of the provision of transitional housing. Deposits are also allowed as long as the subgrantee has an agreement with the landlord that the full/remaining deposit will be returned to the subgrantee and not the victim at the end of the lease.
- Equipment and supplies –Cameras to record injuries is allowed.
- Co-location of services, such as Family Justice Centers; however, if any of the underlying services of the center cannot be funded through STOP, such as services for children under 11, then the staffing for those services still cannot be supported through this purpose area, just the co-location.

## **VAWA Unallowable Expenditures**

- Lobbying, except with explicit statutory authorization
- Fundraising
- Purchase of real property
- Physical modifications to buildings, including minor renovations (such as painting or carpeting)
- Construction
- Vehicles

## VAWA Unallowable Expenditures Cont.

- Law enforcement equipment such as uniforms, safety vests, shields, weapons, bullets, and armory
- Immigration fees for battered immigrant women
- Criminal defense work, including defending women who assault, kill, or otherwise injure their abusers
- Services for children under the age of 11; however funds may support services for secondary services such as children who witness domestic violence
- Paying for moving household goods to a new location or acquiring furniture or housing in a new location
- The creation of a voucher program where victims are directly given vouchers for services such as housing or counseling
- Fees in connection with the filing of criminal charges against the offender, or the costs associated with the filing, issuance, registration, modification, enforcement, dismissal, withdrawal, or service of a warrant, protection order, petition for a protection order, or witness subpoena, whether issued inside or outside the state, tribal, or local jurisdiction
- Conducting research
- Pre-award costs unless prior approval received

## VAWA Unallowable Expenditures Cont.

- Food and beverage costs – OVW may approve the use of grant funds to provide a working meal at a meeting, conference, training, or other event, if one of the following applies:
  - The location of the event is not in close proximity to food establishments, despite efforts to secure a location near reasonably priced and accessible commercial food establishments.
  - Not serving food will significantly lengthen the day or necessitate extending the meeting to achieve meeting outcomes.
  - A special presentation at a conference requires a plenary address where there is no other time for food to be obtained.
  - Other extenuating circumstances necessitate the provision of food.
- Justification for an exception listed above must be approved.
- Applicants must comply with all requirements governing the use of federal funds for expenses related to conferences which includes requirements pertaining to:
  - Cost of Logistical Conference Planning
  - Cost of Programmatic Conference Planning
  - Conference Space and Audio-Visual Equipment and Services
  - Prohibition on Entertainment at Conferences
  - Food and Beverages at Conferences
  - Prohibition on Trinkets at Conferences
  - Prior Approval Required Before Entering Into Contracts or Expending Funds for Conferences
  - Conference Reporting

# SASP Allowable Expenditures

- Projects that focus on direct services for children who are victims of sexual assault
- Services rendered to child victims do not have to be provided in connection with serving an adult parent, and there is no age restriction on child victims.
- Outreach activities to inform persons about the services provided by a specific program
- Volunteer-related activities so long as those volunteers provide direct services for victims
- Programs that address intimate partner, stranger, and non-stranger sexual assault, as well as adult, adolescent, and child sexual violence, regardless when the assault occurred
  - Both male and female victims may be served
- Training of program staff who will provide specific grant-funded victim services
- Advocates accompanying a victim through any aspect of the criminal justice system
- A funded advocate's time in attending SART meetings as part of the advocacy she or he provides
- A hotline to the extent that the hotline is for sexual assault victims
  - If the hotline covers a broader array of issues, the costs of the hotline should be pro-rated according to the percentage of calls that are sexual assault.
- Universities only if they meet the definition of "rape crisis center" and are using SASP funds to provide intervention and related assistance to victims of sexual assault
- Rent, office supplies, computer equipment, or office furniture can be funded provided that the subgrantee is also funding a staff or contract position to provide direct services The office space and other office items associated with the position may be charged to the grant.

## SASP Allowable Expenditures Cont.

- Developing policies and protocols as long as it is only a small aspect of the subgrantee's overall direct service project
- Provided the subgrantee organization provides services to sexual assault victims of all ages, the SASP funded program may focus on a specific age group such as children, youth, or elders.
- Assisting survivors with applications for housing
- Emergency support for needs directly related to an incident of sexual assault as well as financial support related to healing is allowed. Assistance with transportation costs to attend therapy or a support group or court would all be allowable. There could be a situation where assistance with an electric bill or a month's rent would be allowed – maybe the survivor isn't able to work as much because of the assault or has to take unpaid leave from work to attend criminal or civil proceedings. Ongoing financial supports are best considered on a case-by-case basis.
- Counseling services

## SASP Unallowable Expenditures

- Lobbying
- Fundraising
- Purchase of real property
- Physical modifications to buildings, including minor renovations (such as painting or carpeting)
- Construction

# SASP Unallowable Expenditures Cont.

- Domestic Violence Services
- Development of a SART; if an advocate position is SASP funded, the time in attending SART meetings may be covered as part of the advocacy provided.
- Training board members; however, board members can attend training provided to staff and volunteers as long as no SASP funds are expended to support their attendance
- Developing training curricula
- Training SANEs
- Legal representation
- Support groups to high school students identified as “at risk of sexual assault” based on risky behavior
- Food and beverage costs – OVW may approve the use of grant funds to provide a working meal at a meeting, conference, training, or other event, if one of the following applies:
  - The location of the event is not in close proximity to food establishments, despite efforts to secure a location near reasonably priced and accessible commercial food establishments.
  - Not serving food will significantly lengthen the day or necessitate extending the meeting to achieve meeting outcomes.
  - A special presentation at a conference requires a plenary address where there is no other time for food to be obtained.
  - Other extenuating circumstances necessitate the provision of food.

## SASP Unallowable Expenditures Cont.

- Justification for an exception listed above must be approved.
- Conducting research
- Pre-award costs unless prior approval received
- Applicants must comply with all requirements governing the use of federal funds for expenses related to conferences which includes requirements pertaining to:
  - Cost of Logistical Conference Planning
  - Cost of Programmatic Conference Planning
  - Conference Space and Audio-Visual Equipment and Services
  - Prohibition on Entertainment at Conferences
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  - Prior Approval Required Before Entering Into Contracts or Expending Funds for Conferences
  - Conference Reporting

# Personnel Requirements

- Authorized Official (AO)
- Project Director/ Agency Administrator (PD)
- Financial Officer (FO)
- PD and FO can NOT be the same person.
  - Checks and balances
  - Chain of command
- Financial Officer is the person who **ACTUALLY** **COMPLETES** the financial reports and maintains the ledger.



# Award Packet How-To

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

# Award Packet How-To Continued

- **Budget Revisions**

- Please Review the Award Packet Instructions for specific directions on changes that need to be made on your budget in the budget section of OKGrants.

- **Goals and Objective Revisions**

- Please be sure to check the Goals, Objectives, and Activities Revisions page to determine whether or changes must be made in the Goals and Objectives Section of OKGrants.

- **Additional Changes**

- Any additional changes will be sent to you by email.
- If the PD, FO, or AO has changed since the application was submitted, those changes can be made at this time on the Application Information Page.

# Award Packet How-To Continued

- Use Print Award Packet link to print a complete set of award docs.
- Authorized Official MUST submit the packet.
- Do **NOT** submit the packet until all requested changes have been made.
- Two options from here:
  - The DAC will move to Grant Awarded status
  - The DAC will move to Modifications Required Status if changes are still needed

# Goals and Objectives Revisions: A Comparison

<b>GOALS</b>	<b>OBJECTIVES</b>
Are broad	Are narrow
Are general intentions	Are precise
Are intangible	Are tangible
Are abstract	Are concrete

# Goal and Objectives Revisions — Continued

- Goals are broad, general, intangible, and abstract.
- Goals should ALWAYS tie directly with the purpose of the grant.
- Goals should meet certain criteria:
  - Clarify the vision and mission
  - Represent a desired program result

# Goal and Objectives Revisions – Continued

- Objectives are: SMART
- Specific
- Measurable
- Attainable
- Results-oriented
- Time-bound
- Defines what your agency will do to achieve the project goals.
  - Short Term
  - Answers: - Who?
    - Will have what?
    - By when?

# Goal and Objectives Revisions – Continued

## **Sample Goal and Objective:**

**Goal:** Expand sexual assault victim advocacy services for teen victims by providing a specialized Teen Sexual Assault Advocate full time who will seamlessly support and respond to victims of sexual assault at hospitals, police stations, court, and any other safe and appropriate site as needed by the victim while providing 24-hour services.

**Objective:** A. Provide a Teen Sexual Assault Advocate to respond to at least 160 teen primary victims and 200 secondary victims of sexual assault in hospitals, agency offices, police stations, court, and any other safe and appropriate site as needed by December 31, 2021.

# Goal and Objectives Revisions – Continued

Activities describe the steps that will be taken to achieve the objectives.

## **Sample Activities:**

- Schedule and dispatch Sexual Assault Advocates 24-hours a day, seven days a week to any hospital in Oklahoma County.
- Provide support, education and referrals to victims of sexual assault at hospitals, police stations, court, and any other safe and appropriate site as need by the victim.
- Provide a Teen Sexual Assault Support Group.
- Provide replacement clothing to victims of sexual assault.
- Provide safety planning, emergency numbers and 911 phones.
- Provide a Teen Advocate to be available during business hours to respond to primary and secondary victims who inquire about teen services available.

## Goal and Objectives Revisions – Continued

- Goals/ Objectives are closely reviewed during a grant monitoring visit.
- Evaluating whether goals/ objectives are being met measures the effectiveness, efficiency, use, quality, and purpose of why federal funds are being expended.

# Award Documents / Requirements

- Special Conditions
- Statement of Audit Arrangements
- Disclosure of Lobbying Activities
- Certification of Project Income
- Accounting System Review (Must be completed by Financial Officer)

*These require electronic signatures! Signature signifies willingness to abide by the rules.*



# Award Documents/Requirements

- Certification of Equal Employment Opportunity Plan/EEOP Utilization Plan
- Confidentiality Acknowledgement
- Requirement to Report Actual or Imminent Breach of PII/ Agency's PII Policies
- Determination of Suitability to Interact with Participating Minors
- Full Faith and Credit - LE Only

*These require signatures and uploads; failure to do so can result in suspension / termination of funding.*

# Award Documents / Uploads

## EEOP

- Subgrantees are now required to submit their EEOP Certification online at <https://ocr-eeop.ncjrs.gov>.
- Once submitted, please upload the PDF form, signed by the AO, to the Uploads Section of the Award Packet. If required to complete an EEOP Utilization Report, a copy of this must also be uploaded in OKGrants. *Note: Police Departments and Sheriff's Departments must have the county or city fill this out as the county or city are technically the subgrantees.*

## Confidentiality Acknowledgement

- Subgrantees are required to have their AO sign an Acknowledgement of Notice of Statutory Requirement to Comply with the Confidentiality and Privacy Provisions of the Violence Against Women Act, as Amended and upload the document to the Uploads Section in the Award Packet Section in OKGrants. *Note: Again, for law enforcement agencies, this would be the city or the county.*

# EEOP Continued

Then If	Does the recipient need to submit a Certification Form to OCR?	Does the recipient need to develop an EEOP?	Must the recipient submit an EEOP Utilization Report to OCR?
Recipient is a Medical or Educational Institution, Indian Tribe, or Nonprofit	YES	NO	NO
Largest individual grant received is less than \$25,000	YES	NO	NO
Recipient has less than 50 employees	YES	NO	NO
None of the above	YES	YES	YES

# Award Documents Uploads Continued

## Requirement to Report Actual or Imminent Breach of Personally Identifiable Information PII

- Subgrantees are required to have written procedures/policies in place to respond in the event of an actual or imminent “breach” (OMB M-17-12) if the subgrantee creates, collects, uses, processes, stores, maintains, disseminates, discloses, or disposes of “personally identifiable information (PII)” (2 C.R.R. 200.79) within the scope of their grant funded program or activity, or uses or operates a “Federal information system” (OMB Circular A-130).
- An acknowledgement that the agency has procedures/policies must be signed by the AO and uploaded to the Uploads Section in the Award Packet section in OKGrants. The procedures must be uploaded as well.
- The breach procedures/policies must include a requirement to report to the DAC no later than **12 hours** after an occurrence of an actual breach or the detection of an imminent breach.
- Once the DAC is notified, we will send you the proper form to complete.
- Note: for law enforcement agencies, the county or city would fill this out.

# Award Documents Uploads Continued

## Determination of Suitability to Interact With Minors

- Subgrantees are required to conduct a criminal background check on all grant funded personnel who will interact with minors. This form which indicates who in the agency will be interacting with minors, the relationship to the grant funded project, the date of the criminal background check regarding that employee, and the date the next background check will be done must be signed by the AO and uploaded to the Uploads Section in the Award Packet section of OKGrants.

## Full Faith and Credit - VAWA LE Only

- The statement for Law Enforcement agencies stating that all VAWA funded law enforcement officers and investigators will comply with the Full Faith and Credit Provision of VAWA and recognize and enforce all protective orders regardless of jurisdiction must be signed by the AO and uploaded to the Uploads Section in the Award Packet section of OKGrants.

# Special Conditions- Continued

## Budget

- Must be used for the purposes identified in the application
- Any changes must receive written approval through the submission of a GAN.
- Funds expended prior to written approval may be determined as unallowable.
- Prior approval must be received from the DAC before a program can earn program income.

## Victim Safety

- S.T.O.P. VAWA/SASP monies are not to be used for activities that may compromise victim safety.
  - Failure to respect a victim's 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

- Subgrantees may not disclose, reveal, or release any personally identifying information or individual information collected in connection with services requested, utilized, or denied through grantees' and subgrantees' programs, regardless of whether the information has been encoded, encrypted, hashed or otherwise protected.
- Subgrantees may not disclose, reveal, or release individual client information without the informed, written, reasonably time-limited consent of the person (or in the case of an unemancipated minor, the minor and the parent or guardian or in the case of legal incapacity, a court-appointed guardian) about whom information is sought, whether for this program or any other Federal, State, tribal, or territorial grant program, except that consent for release may not be given by the abuser of the minor, incapacitated person, or the abuser of the other parent of the minor.
- If release of information is compelled by statutory or court mandate; subgrantees shall make reasonable attempts to provide notice to victims affected by the disclosure of information; and subgrantees shall take steps necessary to protect the privacy and safety of the persons affected by the release of the information.

## Special Conditions- Continued

- In no circumstances may:
  - a victim be required to provide a consent to release his or her PII as a condition of eligibility for the services provided by the subgrantee.
  - Any PII be shared in order to comply with federal, tribal, or state reporting, evaluation, or data collection requirements, whether for this program or any other federal, tribal, or state grant program.
- Nothing in this section prohibits a subgrantee from reporting suspected abuse or neglect, as those terms are defined and specifically mandated by the state or tribe involved.

### 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 in order to avoid violation of 18 U.S.C. § 1913.

# Special Conditions-Continued

## Fraud and Abuse

- Each subgrantee is to promptly refer to the DAC and the Department Of Justice (DOJ), Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, contractor, subcontractor, or other person has, in connection with funds under the subaward, 1) submitted a claim that violates the False Claims Act; or 2) has committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, 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

Potential fraud, waste, abuse, or misconduct involving or relating to funds under the VAWA/SASP subaward should be reported to:

Office of Inspector General

U.S. Department of Justice

Investigations Division

1425 New York Avenue, N.W., Suite 7100

Washington, D.C. 20530

DOJ OIG Hotline: 800-869-4499 (phone) or 202-616-9881 (fax)

Additional information is available from the DOJ OIG website at

<https://oig.justice.gov/hotline>

# Special Conditions-Continued

## LEP

To avoid discrimination against LEP persons, subgrantees must:

- Take **reasonable steps** to ensure **meaningful access** to the programs, services, and information the subgrantee provides, **free of charge**.
- Establish and implement **policies and procedures** for language assistance services that provide LEP persons with meaningful access.

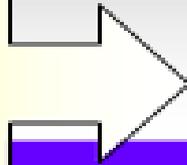
### 5 elements of a written LEP Policy:

- A process for identifying LEP Persons who need language assistance
- Information about the available language assistance measures.
- Training for staff
- Notice to LEP persons
- Monitoring and updating the LEP policy

# Special Conditions-Continued

## What are language services?

Provide  
oral  
language  
services

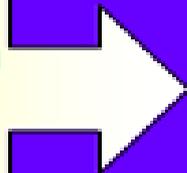


### Insure Interpreter Competency

Usually family members, friends, and uncertified co-workers are not appropriate.

and

Provide  
translation  
of written  
materials



### Safe Harbor Provision

If 5% or 1,000 (whichever is less) of population is LEP, VITAL documents must be translated

However, if 5% represents fewer than 50, then written notice of free written translation upon request must be provided).

# Special Conditions- Continued

## Civil Rights

- The Violence Against Women Reauthorization Act of 2013 added a new civil rights provision, 34 U.S.C. § 12291(b)(13) 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 Continued

## **Employment eligibility verification for hiring under the award**

- The subgrantee must ensure that, as part of the hiring process for any position within the United States that is or will be funded (in whole or in part) with award funds, the subgrantee properly verifies the employment eligibility of the individual who is being hired, consistent with the provisions of 8 U.S. C. § 1324a(a)(1) and (2). The details of the recipient's obligations under this condition are posted on the OVW website at <https://www.justice.gov/ovw/award-conditions> (Award Condition: Employment eligibility verification for hiring under award), and are incorporated by reference here.

## **Unreasonable restrictions on competition under the award**

- No subgrantee may (in any procurement transaction) discriminate against any person or entity on the basis of such person or entity's status as an "associate of the federal government" (or on the basis of such person or entity's status as a parent, affiliate, or subsidiary of such an associate), except as expressly set out in 2 C.F.R. 200.319(a) or as specifically authorized by DOJ. The details of the subgrantee's obligations under this condition are posted on the OVW website at <https://www.justice.gov/ovw/award-conditions> (Award Condition: Unreasonable restrictions on competition under the award; association with federal government), and are incorporated by reference here.

## Special Conditions- Continued

- Subgrantees must have policies notifying beneficiaries that it does not discriminate in the delivery of services or benefits based on race, color, national origin, religion, sex, disability, age, sexual orientation and gender identity.
- Subgrantees must have policies notifying employees that it does not discriminate in the delivery of services or benefits based on race, color, national origin, religion, sex, disability, sexual orientation and gender identity.
- Subgrantees must also have written policies for notifying employees and program participants on how to file complaints alleging discrimination, including how to file complaints with the DAC and the Office of Civil Rights.

# Special Conditions- Continued

## Compliance with DOJ Regulations pertaining to civil rights and nondiscrimination

- Among other things, 28 C.F.R. Part 38 includes rules that prohibit specific forms of discrimination on the basis of religion, a religious belief, a refusal to hold a religious belief, or refusal to attend or participate in a religious practice. Part 38 also sets out rules and requirements that pertain to subgrantee organizations that engage in or conduct explicitly religious activities, as well as rules and requirements that pertain to subgrantees that are faith-based or religious organizations.
- The subgrantee must comply with all applicable requirements of 28 C.F.R. Part 42, specifically including any applicable requirements in Subpart E of 28 C.F.R. Part 42 that relate to an equal employment opportunity program.
- The subgrantee must comply with all applicable requirements of 28 C.F.R. Part 54, which relates to nondiscrimination on the basis of sex in certain “education programs. “

# Special Conditions-Continued

## Contractor/Consulting

- Subgrantees will **not** pay consultants in excess of **\$650 per day** without prior DAC review and approval.
  - Requires a detailed justification submitted to OVW through the DAC

## Texting

- Subgrantees will adopt and enforce policies banning employees from texting while operating any vehicle during the course of performing work funded by this grant.

## Community Education

- 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.

# 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.

# Special Conditions - Continued

## Non-disclosure/Internal Confidentiality Agreement

- 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- Continued

## Trafficking

- The subgrantee must comply with all applicable requirements (including requirements to report allegations) pertaining to prohibited conduct related to the trafficking of persons, whether on the part subgrantees, or individuals defined (for purposes of this condition) as "employees" of any subgrantee. The details of the subgrantee's obligations related to prohibited conduct related to trafficking in persons are posted on the OVW website at <https://www.justice.gov/ovw/grantees> (Award condition: Prohibited conduct by recipients and subrecipients related to trafficking in persons (including reporting requirements and OVW authority to terminate award)), and are incorporated by reference here.

# Special Conditions- Continued

## Ongoing Compliance with statutory Certifications

- 34 U.S.C. § 10450 (regarding certain fees and costs) certifies that its laws, policies, and practices do not require, in connection with the prosecution of any misdemeanor or felony domestic violence, dating violence, sexual assault, or stalking offense, or in connection with the filing, issuance, registration, modification, enforcement, dismissal, withdrawal or service of a protection order, or a petition for a protection order, to protect a victim of domestic violence, dating violence, sexual assault, or stalking, that the victim bear the costs associated with the filing of criminal charges against the offender, or the costs associated with the filing, issuance, registration, modification, enforcement, dismissal, withdrawal or service of a warrant, protection order, petition for a protection order, or witness subpoena, whether issued inside or outside the State, tribal, or local jurisdiction.

## Special Conditions- Continued

- 34 U.S.C. § 10451 requires states to certify that their laws, policies, or practices “will ensure that no law enforcement officer, prosecuting officer, or other governmental official shall ask or require an adult, youth, or child victim of an alleged sex offense...to submit to a polygraph examination or other truth telling device as a condition for proceeding with the investigation for such an offense.”
- Non-compliance with any of the forgoing may also result in termination or suspension of the grant or other remedial measures, in accordance with applicable laws and regulations. (See DAC Special Conditions # 9, 10, and 11)

# Special Conditions- VAWA Specific

- **Victim Services Only:** During the award period, the VAWA funded program must hold at least two outreach activities that targets the underserved populations in their service area.
- **Prosecution Only:** During the award period, VAWA funded prosecutors must hold at least two law enforcement trainings 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 eight times to coordinate services to victims.
- For programs funded in the **Victim Services, Culturally Specific Victim Services, Law Enforcement, and Prosecution** categories, if a CCRT and/or SART is established in the community, VAWA funded personnel will participate in 75% of the team meetings.

# Special Conditions-SASP Specific

## Use of funds for direct intervention and related assistance

- The subgrantee agrees that funds will only be used for the provision of direct intervention and related assistance to victims of sexual violence and their family and household members, 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 Sexual Assault Response Teams.

# 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.



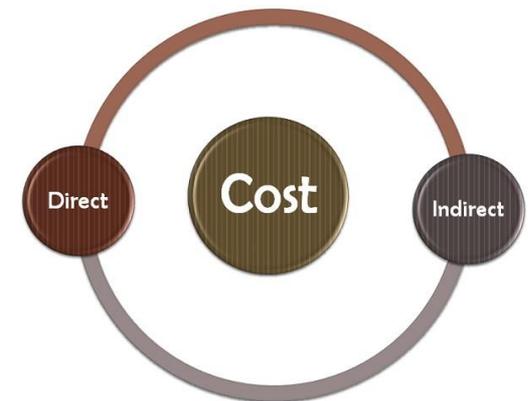
# Financials



- 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.

# Direct vs. Indirect Costs

**Direct** costs are those for activities or services that benefit specific projects, e.g. salaries for project staff and materials required for a particular project. Because these activities are easily traced to projects, their costs are usually charged to projects on an item-by-item basis.



## Direct vs. Indirect Costs Continued

**Indirect** costs are generally the expenses associated with doing business that are not readily identified with a particular grant, contract, or project, but are necessary for the general operation of the organization. Indirect costs are those for activities or services that benefit more than one project. Their precise benefits to a specific project are often difficult or impossible to trace. For example, it may be difficult to determine precisely how the activities of the director of an organization benefit a specific project.

## Direct vs. Indirect Costs Continued

It is possible to justify the handling of almost any kind of cost as either direct or indirect. Labor costs, for example, can be indirect, as in the case of maintenance personnel and executive officers; or they can be direct, as in the case of project staff members. Similarly, material such as miscellaneous supplies purchased in bulk — pencils, pens, paper—are typically handled as indirect costs, while materials required for specific projects are charged as direct costs.

# Examples

## **Costs usually charged directly:**

- Project Staff
- Consultants
- Project supplies
- Publications
- Travel

## **Costs either charged directly or allocated indirectly:**

- Telephone charges
- Computer use
- Clerical and financial staff working with all agency programs
- Postage and printing
- Miscellaneous office supplies

# Examples - Continued

## Costs usually allocated indirectly:

- Utilities
- Rent
- Audit and legal
- Administrative staff
- Equipment rental



# Project Information

- Award Period
  - 1/1/2020 to 12/31/2021
- Do **NOT** expend funds before **1/1/2020**.
- Expenditures **MUST** be encumbered, through a purchase order or some other means, before 12/31/2021.
- You have 60 days past 12/31/2021 to pay for those encumbrances.



# Project Information- Continued

- **REQUIRED** to be operational within 60 days of start date – March 1, 2020
- If there is a delay, you must send a letter to the Federal Grants Division Director, 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** through the submission of a GAN.

# 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)
  - 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.



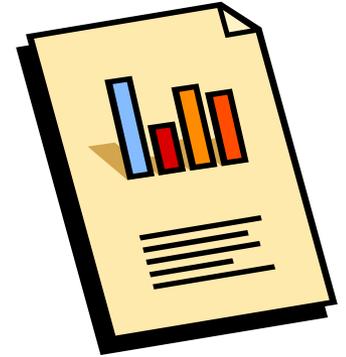
# Muskie Report



- Two kinds of information to track:
  - Items everyone must complete
  - Items that apply to your specific program
- **Reporting Periods: 1/1/2020 to 12/31/2020 and 1/1/21 to 12/31/2021**
- **Only** track statistics on the **GRANT-PAID** activities.
- Do **NOT** keep statistics for your entire agency for this report.
- Blank report form for you to complete will be e-mailed to you each December.
- Muskie Report Due
  - **January 31, 2021 (Time period 1/1/20 – 12/31/20)**
  - **January 31, 2022 (Time period 1/1/21 – 12/31/21)**
- 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.



# Muskie – Determining FTE's

Report the total number of full-time equivalent (FTE) staff funded by the SASP/VAWA Program during the current reporting period. Report staff by function(s) performed, not by title or location. Include employees who are part-time and/or partially funded with these subgrant funds as well as consultants/contractors. If an employee or contractor was employed or utilized for only a portion of the reporting period, prorate appropriately. If staff members fall into two or more categories of job descriptions, divide their time as appropriate. Report all FTEs in decimals, not percentages. One FTE is equal to 2080 hours—40 hours per week multiplied by 52 weeks.

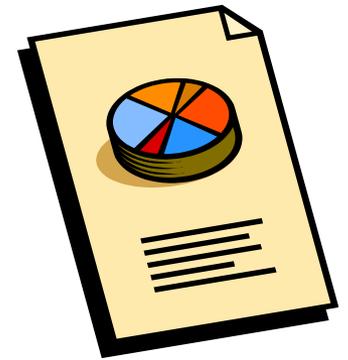
# Muskie – Determining FTE's cont.

- Example 1: You have one full-time advocate whose salary is 100% funded with grant funds and one full-time counselor whose salary is 25% funded with grant funds. Report them as 1 FTEs under victim advocate and .25 FTEs under counselor.
- Example 2: A staff member, whose salary is 100% funded with grant funds, spends approximately 20 hours of her/his time coordinating the victim services program, 16 hours providing victim advocacy, and 4 hours collecting and analyzing evaluation data. Report this as .50 under program coordinator, .40 under victim advocate, and .10 under other as “evaluator.”
- Example 3: If you used your grant funds to contract with an interpreter for the equivalent of three months of full-time work over the course of the reporting period, report that person as .25 FTE (520 hours worked divided by 2080 hours in the annual reporting period) under translator/interpreter.
- Example 4: An employee worked full time for the first six months and had no time on the grant during the last six months of the reporting period. Report that staff person as .50 FTE.



# Semi-Annual Progress Report

- Collects status of goals and objectives
- Only collect information on grant-paid activities
- Report Dates:
  - 1/1/2020 to 6/30/2020 Due: July 31, 2020
  - 7/1/2020 to 12/31/2020 Due: January 31, 2021
  - 1/1/2021 to 6/30/2021 Due: July 31, 2021
  - 7/1/2021 to 12/31/2021 Due: January 31, 2022
- 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. There is no need to keep paper copies of any forms in OKGrants. All records – fiscal and programmatic – either electronically or in a notebook must be easily accessible.
- If you keep paper records, use a 3-ring binder, records file, or a system of your choice.
- Example Tabs:
  - Application
  - Award Documents
  - Spreadsheets
  - MFRs
  - QFRs
  - 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.
  - DA's offices only will receive an auto initiated email monthly with monthly expenses to be claimed on your MFR. DO NOT submit your MFR before receiving this email.

# 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 uploaded in OKGrants in the uploads section under Grant Correspondence.
  - Certifications are needed:
    - January – June, 2020      Due: July 31, 2020
    - July – December, 2020      Due: January 31, 2020
    - January – June, 2021      Due: July 31, 2021
    - July – December, 2021      Due: January 31, 2022
  - 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.



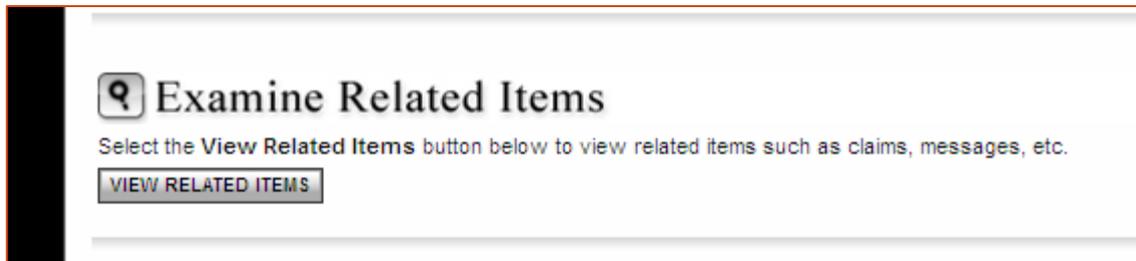
# Expenditures



- Expenditures Requiring Prior Approval:
  - Equipment
  - Consultants
  - Out-of-state travel
- Non-Allowable Expenditures
  - Law enforcement equipment, law enforcement vehicles, immigration fees, food and beverage not necessary to enhance victim safety, renovations or construction, ... See the Financial Guide for complete details.
- If an expenditure is **NOT** in your approved budget categories, you **MUST** get prior approval.

# MFR Request for Funds (Monthly)

- **Due by 11:59:59 PM on the 15<sup>th</sup> of EVERY month, even if you are not requesting funds**
  - The MFR form is found in Examine Related Items the first time you access the form. It can then be found under My Financials.



- **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.**

# MFR Request for Funds

- **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	\$28,877.50
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EFT Payment Memo

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

Carrie Good Carrie Good

# MFR Request for Funds

- Don't forget to **SUBMIT** the report!!
  - It is not turned in until the status is changed. Go back and Check to make sure the status shows submitted.



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## DAC Financial Report Menu

**Document Information:** MFR-2020-Ok Rape Crisis Center-00007-Jun  
**Parent Information:** 2020/21-VAWA-Ok Rape Crisis Center-00017

[Details](#)

Info	Document Type	Organization	Role	Current Status	Period Date / Date Due
	DAC Financial Report	<a href="#">Ok Rape Crisis Center</a>	DAC Grant Program Specialist	Financial Report Submitted	06/01/2019 - 06/30/2019 12/31/2019 11:59PM CST

**View, Edit and Complete Forms**  
Select the **View Forms** button below to view, edit, and complete forms.

# MFR 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

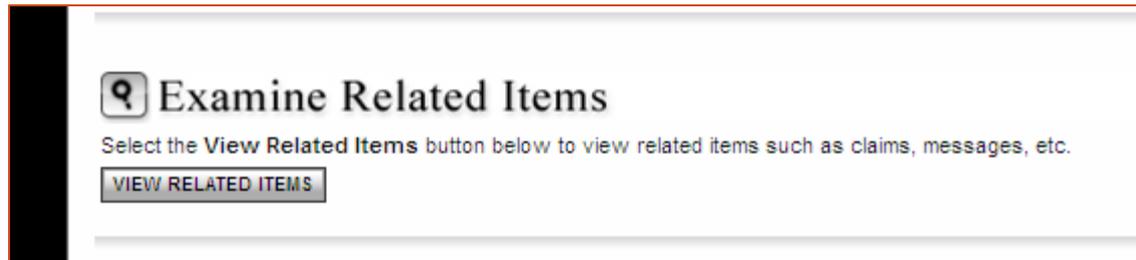


# QFR Reports (Quarterly)

- **Due by 11:59:59 PM on the following dates:**
- January through March **4/15/2020 & 2021**
- April through June **7/15/2020 & 2021**
- July through September **10/15/2020 & 2021**
- September through December **1/15/2021 & 2022**
- Additional Quarter if Necessary **4/15/2022**
  - If funds are encumbered prior to 12/31/21 but paid after Jan. 1, 2022.

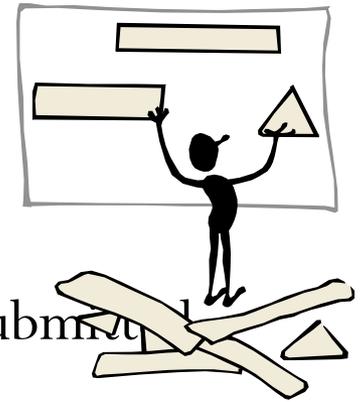


# QFR Reports



- Like the MFR, this form is found within Examine Related Items the first time you access it and then can be found under My Financials.
- 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 QFR must be completed **AFTER** you complete the MFR for the respective quarter in order for all the figures to pull over.
- Please double check that you select the correct quarter **BEFORE** submitting the report. Late or incorrect reports can affect your funding.

# Grant Changes



- Changes to your original grant application must be submitted via a Grant Adjustment Notice (GAN)
- Types of Changes Include:
  - Personnel (Authorized Official, Project Director, Financial Officer)
  - Budget
  - Scope
  - Project Period
- All GAN's **MUST** be approved by the Division Director before taking effect.
- Submission Deadline: **December 1, 2021**

# Personnel Changes



- Personnel Changes
  - Change in PD or FO or AO require the submission of a GAN



## Personnel Changes - Continued

- Personnel Changes for grant funded personnel require a Personnel Form to be emailed to the Grant Programs Specialist's attention. The form must also be uploaded to OKGrants in the Uploads Section under Grant Correspondence.
- There is a form for VAWA and a form for SASP.
- Changes can be in the grant funded personnel as well as changes in the % of grant funding

# Personnel Changes - Continued

**OKLAHOMA DISTRICT ATTORNEYS COUNCIL**  
Federal Grants Division  
**PERSONNEL FORM**

**Grant Program: Violence Against Women Act (VAWA)**

Subgrant Number: \_\_\_\_\_

Subgrantee Name: \_\_\_\_\_

Effective Date: \_\_\_\_\_

Please list the names of the personnel within your agency whose salaries are funded with VAWA dollars. Also, please state the person's title, FTE and the percentage of their time that is paid with VAWA dollars. For example, if they are working full-time and their entire salary is paid only with VAWA funds, the FTE is 1 and VAWA percentage would be 100%.

<u>NAME</u>	<u>TITLE</u>	<u>FTE</u>	<u>% OF TIME PAID WITH VAWA</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Explanation for the changes made above:

The above information should be provided to DAC and a copy uploaded to [OKGrants](#).  
Mail: DAC, 421 NW 13<sup>th</sup> # 290, OKC, OK 73103  
E-mail: [dac-grants@dac.state.ok.us](mailto:dac-grants@dac.state.ok.us)

# Personnel Changes - Continued

**OKLAHOMA DISTRICT ATTORNEYS COUNCIL**  
Federal Grants Division  
**PERSONNEL FORM**

**Grant Program: Sexual Assault Services Programs (SASP)**

Subgrant Number: \_\_\_\_\_

Subgrantee Name: \_\_\_\_\_

Effective Date: \_\_\_\_\_

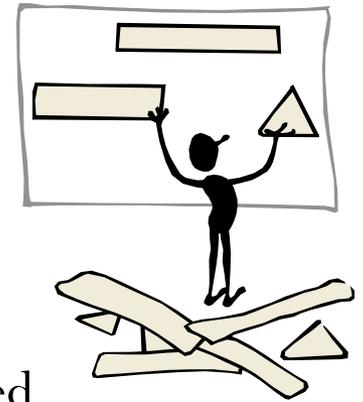
Please list the names of the personnel within your agency whose salaries are funded with SASP dollars. Also, please state the person's title, FTE and the percentage of their time that is paid with SASP dollars. For example, if they are working full-time and their entire salary is paid only with SASP funds, the FTE is 1 and SASP percentage would be 100%.

<u>NAME</u>	<u>TITLE</u>	<u>FTE</u>	<u>% OF TIME PAID WITH SASP</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Explanation for the changes made above:

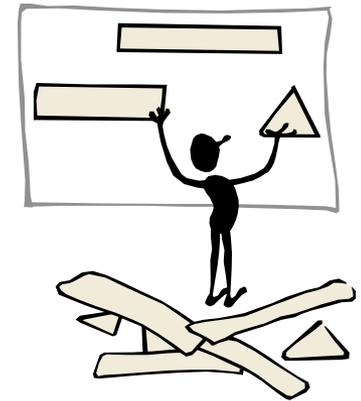
The above information should be provided to DAC and a copy uploaded to [OKGrants](#).  
Mail: DAC, 421 NW 13<sup>th</sup> # 290, OKC, OK 73103  
E-mail: [dac-grants@dac.state.ok.us](mailto:dac-grants@dac.state.ok.us)

# Budget Revisions



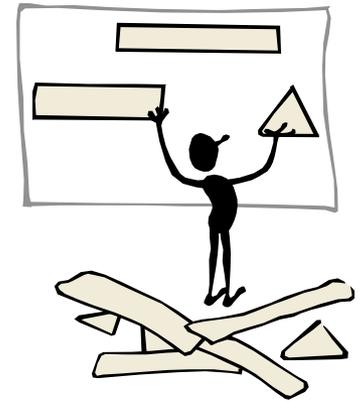
- Budget Revisions are possible
  - Less than 10% of the TOTAL award and within approved categories – no requirements
- More than 10% of the total award or outside of approved categories must get prior approval
  - Must submit a GAN
    - Provide new budget
    - Provide narrative
    - Provide explanation for the revision
- If the revision changes the scope of the project – it requires further approval .
- Submission Deadline: **December 1, 2021**

# 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, 2021**

# Project Period Changes



- Project periods can be extended outside of the 24 month grant period.
- In addition to the GAN narratives, changes in the Project Period will result in the submission of the following:
  - Another semi-annual progress report for every 6 month period added to the initial 12 month project period
  - Another Muskie will be required if an extension is approved, even if the extension is not for an entire year.

Submission Deadline: **December 1, 2021**

# Site Visits

- Monitoring function
  - Assists subgrantees in implementing programs
  - Programmatic and fiscal accountability
  - Program Specialist required to visit all subgrantees.
- Who gets a visit:
  - All subgrantees will get a visit within the 24 month period.
  - High-risk subgrantees will have priority visits or may have additional visit(s).
    - New PD or FO
    - More than two late reports, either financial or programmatic
    - 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 copy of the monitoring form in order to prepare.
  - A list of financial documents that must be sent to the DAC prior to the site visit will be provided with a copy of the monitoring form. This will allow review prior to the visit so that any questions or issues can be resolved in person at the visit.
- Items that should be ready include: financial records, drug-free workplace policy, written civil rights policies, updates on goals and objectives, and the most recent financial audit by either the state or by an outside auditor.

# 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 multiple late or incorrect programmatic and/or fiscal reports
- EXAMPLES:
  - Late or incorrect QFR
  - Failure to submit a Muskie or Semi-annual 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 MFRs and QFRs
  - Late/incorrect Muskie Reports or Semi-annual Progress Reports
  - Corrective Actions
  - Draw Holds



# Compliance Reports - Continued

- **Warning Special Conditions**

- If you have six or more late/incorrect reports in a grant period, your next grant award will receive this Warning Special Condition:
  - *The subgrantee will submit all financial and programmatic reports accurately and on time. The subgrantee understands that the submission of six (6) or more inaccurate or late financial and/or programmatic reports in this award period may jeopardize future funding and/or result in grant suspension.*
- Once you have received the Warning – if, during the warning period, you have six or more late or incorrect reports, your next grant award will receive this additional Special Condition:
  - *The subgrantee will submit all financial and programmatic reports accurately and on time. The subgrantee understands that the submission of two (2) late or incorrect financial and /or programmatic reports will result in immediate grant suspension and funds will be forfeited for the remainder of the grant year.*

# 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 a single audit.
  - If your agency does not, you still must have records available if needed by officials.
  - Copies of audits should be submitted to DAC as soon as completed and uploaded to the Uploads Section in OKGrants under Grant Correspondence.



# 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 the DAC.
  - In order to use any of these funds outside of the initial 24 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, 2021.

