

# 2024/25 VAWA/SASP Grants

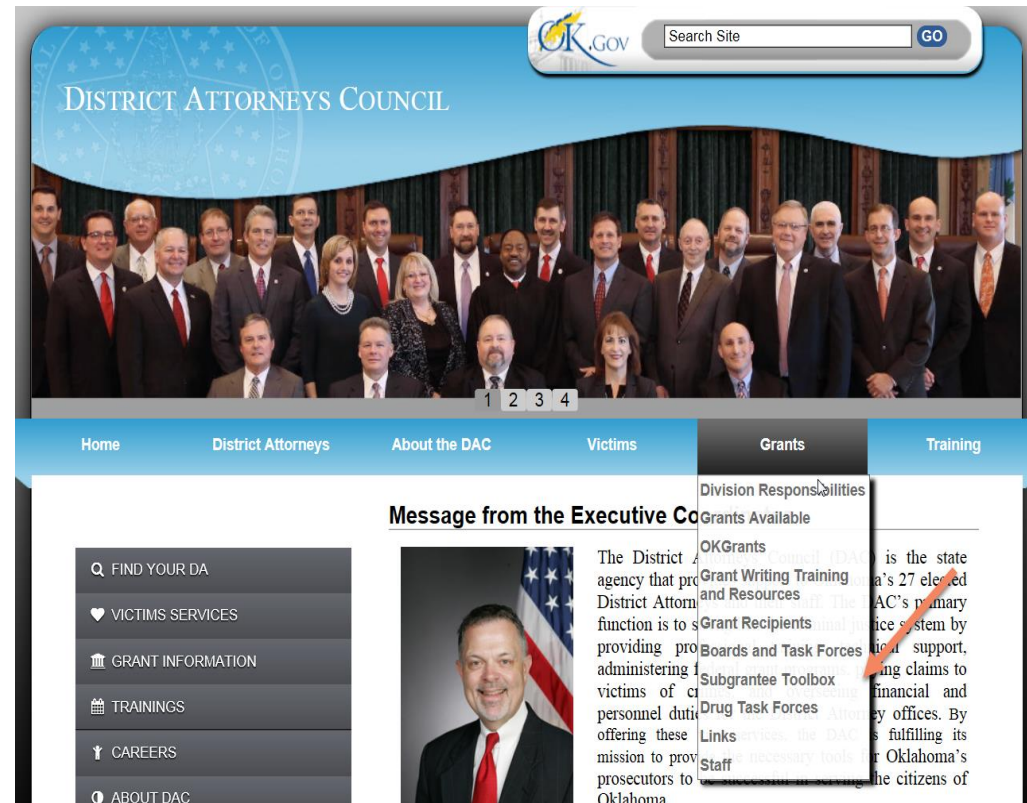
# Webinar Information

All webinar participants will be muted by the host. During the presentation, you can ask questions in the Question or Chat sections which will be answered. Please reserve audio questions for the end of the presentation. Then, if you would like to ask a question, please raise your hand and the host will un-mute you so you may ask your question.

Please put your name, agency, and email address in the chat so that I can send you the presentation.

# 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



# DAC Federal Grants Division



The screenshot shows the OKGrants website interface. At the top, there is a blue header with the "OK GRANTS" logo on the right and the "STATE OF OKLAHOMA" seal on the left. Below the header, there is a navigation bar with "System Login" and "Portal Home" links. The main content area has a blue background with a white wave-like pattern. On the right side, there is a "Login" form with fields for "Username" and "Password", a "LOGIN" button, and links for "Agency Administrator Registration" and "Forgot Password?". On the left side, there is a welcome message and a list of instructions for agency administrators.

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

LOGIN

[Agency Administrator Registration](#)

[Forgot Password?](#)

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

# DAC Federal Grants Division

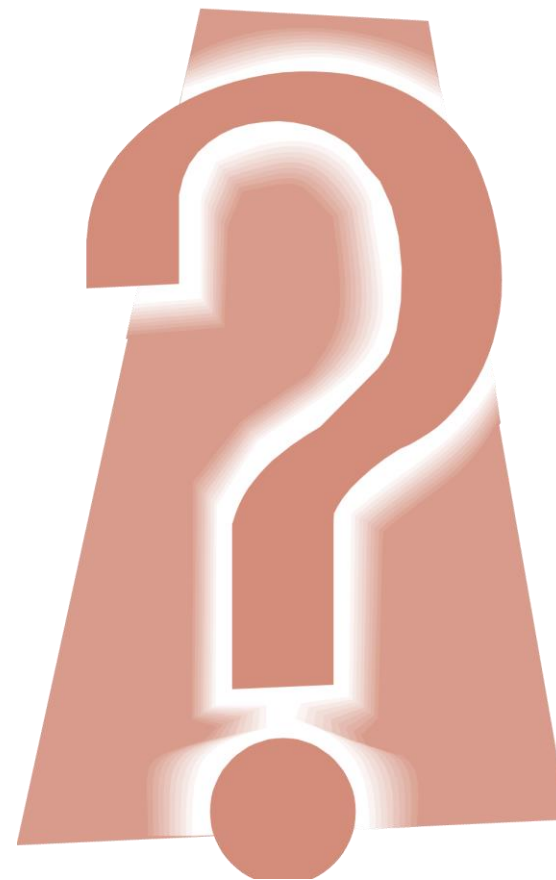
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# DOJ Grants Financial Guide

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

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 which will be emailed to you when completed.

# VAWA and SASP Awards

## VAWA:

38 Subgrantees

Total Amount: \$4,317,989.27

## SASP:

18 Subgrantees

Total Amount: \$2,332,895.71

## 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 Continued

- Health care providers' time conducting forensic exams as long as the exams are performed by specially trained examiners such as SANEs or SAFEs 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 Continued

- 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 Continued

- 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 Continued

- 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/he/they 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 Continued

- 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
- SANE- the advocates' time with a victim during a SANE exam is the only allowable SANE expense

# SASP Unallowable Expenditures Continued

- 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 Continued

- 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
  - Food and Beverages at Conferences
  - Prohibition on Trinkets at Conferences
  - 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 **CANNOT** 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 (AA (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.
- If your PD, AO, or FO has changed since the application was submitted, please make those changes on the Applicant Information Page, make them as a member in OkGrants, and let me know so that I can attach them to the grant.

# Award Packet How-To

## Organization - Rape Crisis Center

Follow the instructions listed below to add/remove/modify organization members.

[Organization Information](#) | [Organization Members](#) | [Organization Documents](#) | [Organization Document Availability](#)

### Organization Members

Administrators with the authority to add members to your organization can follow these steps:

To add a member to your organization, select the **Add Members** link below.

If a member has already added his/her information in the system, you can search for the member.

If you need to add a member's information into the system, select **New Member**.

For more detailed instructions, select the **Show Help** button above.

[Current Members](#) | [Add Members](#)

Sort By:   Results Per Page

<input type="checkbox"/>	Person	Role	Active Dates	Active Documents	Assigned By	Modified By
<input checked="" type="checkbox"/>	<a href="#">Black, Mr. Jack</a>	Agency Administrator	6/10/2016 - <input type="text"/>	21	Russell, Laura 6/10/2016	
<input checked="" type="checkbox"/>	<a href="#">Russell, Andy</a>	Authorized Official	6/10/2016 - <input type="text"/>	20	Black, Mr. Jack 6/10/2016	
<input checked="" type="checkbox"/>	<a href="#">Smith, Frank</a>	Financial Officer	6/10/2016 - <input type="text"/>	20	Black, Mr. Jack 6/10/2016	

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# Award Packet How-To Continued

- **Award Packet Instructions Page**

- **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.

- **Additional Changes**

- Any additional changes needed are listed in the text box on the Award Packet Instructions Page.
    - 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 of the Narrative Section.
    - Look at your Grant Summary and make any necessary changes.

- **Goals, Objectives, and Activities Revision Page**

- Please be sure to check this page to determine whether or not changes must be made in the Goals, Objectives, and Activities Page of the Narrative Section of OKGrants. **If your personnel budget was decreased or you weren't awarded all the personnel you asked for, your objective numbers will need to be prorated to match the funding percentage and/or number of personnel funded.**

# Award Packet How-To Continued

- Use the Award Packet Checklist to make sure you have uploaded all required documents and policies in Uploads under Grant Correspondence.
- 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

# Award Packet How-To Continued

- The Authorized Official is the only one with the authority to submit the application. Once logged into OKGrants, the AO clicks on VIEW STATUS OPTIONS under Change the Status

[ADD NOTE](#) [CHECK GLOBAL ERRORS](#) [SHOW HELP](#)

[Back](#)

## DAC Application Menu

**Document Information: 2022/23-VAWA-OKC VS Agency-00011**

[Details](#)

Info	Document Type	Organization	Role	Current Status	Period Date / Date Due
	DAC Application	<a href="#">OKC VS Agency</a>	Authorized Official	Requires Signatures	03/01/2021 - 03/31/2022 06/30/2021 11:59PM CST

 **View, Edit and Complete Forms**

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

**VIEW FORMS**

 **Change the Status**

Select the **View Status Options** button below to perform actions such as submitting applications or request modifications.

**VIEW STATUS OPTIONS**



# Award Packet How-To Continued

- Then click APPLY STATUS.

My Home My Applications My Financials My Programmatic Reports

My Training Materials | My Organization(s) | My Profile | Logout

SHOW HELP

[Back](#)

## DAC Application Menu - Status Options

Select a button below to execute the appropriate status push.

**Document Information: 2022/23-VAWA-OKC VS Agency-00011**

[Details](#)

**Possible Statuses**

**SIGNATURES SUBMITTED**

APPLY STATUS

# Award Packet How-To Continued

- If you get an error message(s), you will need to go back and complete and save those pages. Once that is done, go back to VIEW STATUS OPTIONS and click apply status.



## Global Errors

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**Document Information: 2022/23-VAWA-OKC VS Agency-00011**



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 You must complete this page.

[Award Budget Summary](#)

 You must complete this page.

[Award Notice](#)

 You must complete this page.

[Certification Of Equal Employment Opportunity Plan](#)



# Award Packet How-To Continued

- The application is **not** submitted until the status shows signatures submitted.

## Document Information: 2022/23-VAWA-District 1-00013

 [Details](#)

Info	Document Type	Organization	Role	Current Status	Period Date / Date Due
	DAC Application	<a href="#">District 1</a>	Authorized Official	Signatures Submitted	03/01/2021 - 03/31/2022 06/30/2021 11:59PM CST



## View, Edit and Complete Forms

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

**VIEW FORMS**



# 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 – they can **only** be the activities performed by the grant funded staff and **pro-rated based on that staff's funding percentage**. For example, if the staff is 75% grant funded then only 75% of their activities should be put in the objectives section.
- Attainable
- Results-oriented
- Time-bound
- Defines what your agency will do to achieve the project goals.

- Short Term

Answers:

Who?

Will have done 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, 2025.

# 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. Again, the objective numbers must match grant funded staff and grant funded staff funding percentage(s).
- 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
- Certification of Privacy\*
- Certification of Compliance with Open Meeting Act – Non Profits Only\*
- 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. This is accomplished when the page is saved.*

*\* New Pages*





# Award Documents/Requirements

- Requirement to Report Actual or Imminent Breach of PII/ Agency's PII Policies
- Determination of Suitability to Interact with Participating Minors/ Agency's Suitability Policies
- Full Faith and Credit - LE Only
- Confidentiality Acknowledgement
- Filing Costs for Criminal Charges Certification of Compliance – VAWA Only\*

*These require signatures and uploads to the Uploads Section under Grant Correspondence; failure to do so can result in suspension / termination of funding.*

# Award Document Uploads Continued

- Forensic Medical Examination Payment Certification of Compliance – VAWA Only
- Judicial Notification Certification of Compliance – VAWA Only
- Polygraph Certification of Compliance – VAWA Only
- Certification of EEOP/Utilization Plan

*These require signatures and uploads to the Uploads Section under Grant Correspondence; failure to do so can result in suspension / termination of funding. (This is a new place for uploads)*

*\* These are two new pages*

# Award Document 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.F.R. 200.1](#)) 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. **The procedures/policies 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. Your policy should also include how survivors whose PII was compromised will be notified.
- Once the DAC is notified, we will send you the proper form to complete
- *Note: for law enforcement agencies that apply under the county or city, the county or city would fill this out since they are technically the subgrantee. The procedures/policies would also be for the city or county.*

# Award Document 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 indicates who in the agency will be interacting with minors, the relationship to the grant funded project, the date of the criminal background check, **including fingerprint background check regarding that employee**, the sites used for the checks, and the date the next background check will be done. It must be signed by the AO. If the fingerprint check was done at a different date, both dates must be listed. This link has all the requirements of the background checks: <https://www.justice.gov/ovw/award-conditions>
- The agency's policies regarding determination of suitability to interact with minors must also be uploaded.

# Determination to Interact with Minors cont.

<https://www.justice.gov/ovw/page/file/1432316/download>

In addition to information resulting from checks or screening required by applicable federal, state, tribal, or local law, and/or by the recipient's (or subrecipient's) written policies and procedures, current and appropriate information includes the results of all required searches listed below, each of which must be completed no earlier than **six months** before the determination regarding suitability.

(1)Public sex offender and child abuse websites/registries

A search (by current name, and, if applicable, by previous name(s) or aliases), of the pertinent and reasonably-accessible federal, state, and (if applicable) local and tribal sex offender and child abuse websites/public registries, including--

(a)the Dru Sjodin National Sex Offender Public Website ([www.nsopw.gov](http://www.nsopw.gov));

(b)the website/public registry for each state (and/or tribe, if applicable) in which the individual lives, works, or goes to school, or has lived, worked, or gone to school at anytime during the past five years; and

(c) the website/public registry for each state (and/or tribe, if applicable) in which the individual is expected to, or reasonably likely to, interact with a participating minor in the course of activities under the award.

# Determination to Interact with Minors cont.

(2) Criminal history registries and similar repositories of criminal history records

For each individual at least 18 years of age who is a covered individual under this award, a **fingerprint search** (or, if the recipient or subrecipient documents that a fingerprint search is not legally available, a name-based search, using current and, if applicable, previous names and aliases) (-- encompassing at least the time period beginning five calendar years preceding the date of the search request -- of pertinent state (and, if applicable, local and tribal) criminal history registries or similar repositories, including--

(a) the criminal history registry for each state in which the individual lives, works, or goes to school, or has lived, worked, or gone to school at any time during the past five years; and

(b) the criminal history registry for each state in which he or she is expected to, or reasonably likely to, interact with a participating minor in the course of activities under the award.

# Determination to Interact with Minors cont.

Pursuant to the VAWA Special Conditions, VAWA-funded personnel, volunteers, consultants, and contractors who interact with minors must have a criminal background check, **including a fingerprint check, every five years**. All of the requirements for this Special Condition can be found at <https://www.justice.gov/ovw/award-conditions>. Please read the entirety of this Special Condition before completing this form and performing the criminal background checks.

List Criminal Background Website(s) utilized to determine suitability to interact with participating minors in the VAWA-funded Project:

OSBI – Background checks; Dru Sjodin National Sex Offender Public Website; OSBI – Fingerprint background check

Individual(s) Names	Identify Relationship to VAWA Project	Date of Criminal	Date Next Background
<u>Suitable to Interact With Minors</u>	<u>EmployeeConsultant/Contractor</u>	<u>Background Check</u> <u>And/or fingerprint check</u>	<u>Check Will Be Due</u>
Jane Doe	Employee	background check 9/30/2020	9/30/2025
		fingerprint background check 1/13/2021	1/13/2026

# Award Document Uploads Continued

## **Full Faith and Credit - VAWA LE Only**

- This statement for Law Enforcement agencies states 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. This must be signed by the AO.

## **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.

Section 40002(b) of the Violence Against Women Act, as amended(42 U.S.C. 13925(b)(2))



# Award Document Uploads Continued

## Filing Costs for Criminal Charges Certification of Compliance- VAWA Only

- This needs to be signed by your AO **and** your PD. The subgrantee assures 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. [34 US Code § 10450](#).

# Award Document Uploads Continued

## **Forensic Medical Examination Payment Certification of Compliance - VAWA Only**

- This needs to be signed by your AO **and** your PD. The subgrantee assures that the policies and practices of the project's service area comply by making sure the State, Indian tribal government, unit of local government, or another government entity incurs the full out-of pocket cost of forensic medical exams for victims of sexual assault and coordinates with health care providers in the region to notify victims of sexual assault of the availability of rape exams at no cost to the victims. The subgrantee further assures that the policies and practices of the project's service are not requiring a victim of sexual assault to participate in the criminal justice system or cooperate with law enforcement. [34 US Code § 10449](#)

# Award Document Uploads Continued

## **Judicial Notification Certification of Compliance – VAWA Only**

- This needs to be signed by your AO **and** your PD. The subgrantee assures that the policies and practices of the project's service area comply to ensure that law enforcement officers, prosecuting officers, or other government officials comply with the requirements found in [18 U.S.C. 922 \(g\)\(8\) and \(9\)](#) which prohibits any person from shipping, transporting, receiving, or possessing firearms or ammunition who:
  - (a) is subject to a court order restraining such person from harassing, stalking, or threatening an intimate partner or child of such intimate partner; or engaging in other conduct that would place an intimate partner in reasonable fear of bodily injury to the partner or child; and includes a finding that such person represents a credible threat to the physical safety of such intimate partner or child; or by its terms explicitly prohibits the use, attempted use, or threatened use of physical force against such intimate partner or child that would reasonably be expected to cause bodily injury;
  - (b) or has been convicted in any court of a misdemeanor crime of domestic violence.

# Award Document Uploads Continued

## **Polygraph Certification of Compliance – VAWA Only**

- This needs to be signed by your AO **and** your PD. The subgrantee assures that the policies and practices of the project's service area comply to ensure that no law enforcement officer, prosecuting officer, or other government official shall ask or require an adult, youth, or child victim of an alleged sex offense as defined under federal, tribal, state, or local law to submit to a polygraph examination or other truth telling device as a condition for proceeding with the investigation of such an offense. The refusal of victim to submit to a polygraph or other truth telling examination or other truth telling examination shall not prevent the investigation, charging, or prosecution of an alleged sex offense by a state, Indian tribal government, or unit of local government. [34 US Code § 10451](#)

# Award Document Uploads Continued

## EEOP

- Subgrantees are required to submit their EEOP Certification online at <https://eeop.ocr.ojp.gov/certsub/homepage>
- Once submitted, please upload the PDF Certification Form signed by the AO. If required to complete an EEOP Utilization Report, a copy of this **as well as** the subgrantee's most recent Utilization Report Approval letter must also be uploaded. If you have a current EEOP Certification Form and/or Utilization Report from a previous grant or another federal grant, these can be used. They are good for two (2) years.
- For additional help - <https://www.ojp.gov/program/civil-rights-office/equal-employment-opportunity-plans>
- ***Note: Police Departments and Sheriff's Departments who applied under the city or county must have the county or city fill this out.***

# Award Document Uploads Continued

## EEOP

- The subgrantee will provide an Equal Employment Opportunity Plan (Utilization Report) if required to maintain one, where the application is for \$25,000 or more. [28 C.F. R. pt. 42, subpts. D, E](#)
- An EEOP is a comprehensive document which analyzes:
  - an agency's workforce in comparison to its relevant labor market data
  - All agency employment practices to determine their impact on the basis of race, sex, or national origin
  - A tool used to identify possible problem areas where discrimination may be occurring
- *Note: Police Departments and Sheriff's Departments who applied under the city or county must have the county or city fill this out.*

# Award Document Uploads Continued

## Does an agency have to prepare an EEOP Utilization Report?

### It depends on:

- Funding (Safe Streets Act, VAWA, VOCA, or JJDP)
  - Status of Organization (e.g. nonprofit)
  - Amount of single award
  - Number of employees
- 
- *Note: Police Departments and Sheriff's Departments who applied under the city or county must have the county or city fill this out.*

# 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



# Special Conditions- VAWA Specific

## Requirements for providing legal assistance

- The subgrantee agrees that legal assistance eligibility requirements, as set forth below, are a continuing obligation on the part of the subgrantee. The legal assistance eligibility requirements are: (1) any person providing legal assistance through a program funded under this grant program (A) has demonstrated expertise in providing legal assistance to victims of domestic violence, dating violence, sexual assault, or stalking in the targeted populations; or (B) (i) is partnered with an entity or person that has demonstrated expertise described in subparagraph (A); and (ii) has completed or will complete training in connection with domestic violence, stalking or sexual assault and related legal issues, including training on evidence-based risk factors for domestic violence and dating violence homicide; (2) any training program conducted in satisfaction of this requirement of paragraph (1) has been or will be developed with input from and in collaboration with a state, local, territorial or tribal domestic violence, dating violence, sexual assault, or stalking victim service provider or coalition, as well as appropriate state, local, territorial and tribal law enforcement officials; (3) any person or organization providing legal assistance through this program has informed and will continue to inform state, local, territorial or tribal domestic violence, dating violence, stalking or sexual assault program and coalitions, as well as state and local law enforcement officials of their work; and (4) the subgrantee's organizational policies do not require mediation or counseling involving offenders and victims physically together, in cases where sexual assault, dating violence, domestic violence, stalking or child sexual abuse is an issue.

# Special Conditions- VAWA Specific

- **Victim Services Only:** During the award period, the VAWA funded program must hold at least two (2) 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 (2) 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 (8) 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. If the CCRT/SART meets monthly, that would be 9 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.

## Special Conditions Continued –VAWA and SASP

- **Requirements related to Unique Entity Identifier (UEI)**
- The subgrantee must comply with applicable requirements regarding the UEI number. This is replacing the DUNS number. If you are an entity already registered in <https://www.sam.gov> (sam.gov) you have already been assigned a new UEI to replace your DUNS which is viewable in your entity registration record in sam.gov. If you are NOT registered in sam.gov, you will be able to request a new UEI in sam.gov.
- This new unique entity identifier will be required to be provided to the DAC by **April 30th, 2024**. This link will explain the unique identifier and its purpose: <https://interact.gsa.gov/blog/what-do-i-need-know-about-new-unique-entity-id-samgov>

## Special Conditions Continued –VAWA and SASP

### Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence

- The subgrantee must have a policy, or issue a policy by **March 31, 2024** to address workplace-related incidents of sexual misconduct, domestic violence, and dating violence involving an employee, volunteer, consultant, or contractor. The details of this requirement are posted on the OVW web site at <https://www.justice.gov/ovw/award-conditions> (Award Condition: Policy for response to workplace-related sexual misconduct, domestic violence, and dating violence), and are incorporated by reference here.
- I will be happy to send you a template from OVW.

# 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 Grant Adjustment Notice (GAN) in OKGrants.
- 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 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  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

or 202-616-9881 (fax) or via the OAG webpage at  
<https://oig.justice.gov/hotline/contact-grants.htm> (select submit  
report online)

Additional information is available from the DOJ OIG website at  
<https://oig.justice.gov/hotline>

# 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

## Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)

- The subgrantee must comply with, and is subject to, all applicable provisions of 41 U.S.C. 4712, including all applicable provisions that prohibit, under specified circumstances, discrimination against an employee as reprisal for the employee's disclosure of information related to gross mismanagement of a federal grant, a gross waste of federal funds, an abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a federal grant.
- **The subgrantee also must inform its employees, in writing (and in the predominant native language of the workforce), of employee rights and remedies under 41 U.S.C. 4712.**
- Should a question arise as to the applicability of the provisions of 41 U.S.C. 4712 to this award, the recipient is to contact the DAC for guidance.

# Special Conditions-Continued

## Applicability of Part 200 Uniform Requirements and DOJ Grants Financial Guide

- The subgrantee agrees to comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in [2 C.F.R. Part 200](#), as adopted and supplemented by DOJ in [2 C.F.R. Part 2800](#) (together, the “Part 200 Uniform Requirements”), and the current edition of the DOJ Grants Financial Guide as posted on the Office on Violence Against Women (OVW) website including any updated version that may be posted during the period of performance. The recipient also agrees that all financial records pertinent to this award, including the general accounting ledger and all supporting documents, are subject to agency review throughout the life of the award, during the close-out process, and for as long as the records are retained pursuant to [2 C.F.R. 200.334](#). VAWA and SASP records may be destroyed 6 ½ years after the close out of the grant OR when your agency specifies – whichever is greater.

# Special Conditions-Continued

## Contractor/Consulting

- The subgrantee acknowledges that consultants paid with award funds generally may not be paid at a rate in excess of \$81.25 an hour, not to exceed \$650 per day. To exceed this specified maximum rate, subgrantees must submit to the DAC a detailed justification and have such justification then approved by OVW, prior to obligation or expenditure of such funds. Issuance of this award or approval of the award budget alone does not indicate approval of any consultant rate in excess of \$81.25 per hour, not to exceed \$650 per day. Although prior approval is not required for consultant rates below this specified maximum rate, subgrantees are required to maintain documentation to support all daily or hourly consultant rates.

## Texting

- Pursuant to [Executive Order 13513](#), "Federal Leadership on Reducing Text Messaging While Driving," 74 Fed. Reg. 51225 (October 1, 2009), DOJ encourages subgrantees to adopt and enforce policies banning employees from text messaging while driving any vehicle during the course of performing work funded by this award, and to establish workplace safety policies and conduct education, awareness, and other outreach to decrease crashes caused by distracted drivers.

# 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 of 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/award-conditions> (Award condition: Prohibited conduct by subgrantees related to trafficking in persons (including reporting requirements and OVW authority to terminate award)), and are incorporated by reference here.

# Special Conditions-Civil Rights

## Civil Rights – The Office for Civil Rights Enforces:

- Title VI of the Civil Rights Act of 1964, as amended (*race, color, national origin*)
- Program Statutes, as amended (e.g., Safe Streets Act, Victims of Crime Act, Violence Against Women Act, JJDPa) (*race, color, national origin, sex, religion, disability, sexual orientation, and/or gender identity*)
- Section 504 of the Rehabilitation Act of 1973, as amended (*disability*)
- Title II of the Americans with Disabilities Act of 1990, as amended (*disability*)
- Age Discrimination Act of 1975, as amended (*age*)
- Title IX of the Education Amendments of 1972, as amended (*sex in education programs*)



# Special Conditions-Civil Rights Continued

## Violence Against Women Act – Reauthorization 2013/2022

- No person in the United States shall, on the basis of **actual or perceived** race, color, religion, national origin, sex, **gender identity**, (as defined in paragraph 249 (c)(4) of title 18, United States Code), **sexual orientation**, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds appropriated for grants, cooperative agreements, and other assistance administered by the Office on Violence Against Women.

<https://www.justice.gov/archives/ovw/file/29386/download>

# Special Conditions-Civil Rights Continued

## Violence Against Women Act Reauthorization Act of 2013 / 2022 Continued

- If sex segregation or sex-specific programming is **necessary to the essential operation of a program**, nothing in this paragraph shall prevent any such program or activity from consideration of an individual's sex. In such circumstances, grantees may meet the requirements of this paragraph by providing **comparable services** to individuals who cannot be provided with the sex-segregated or sex-specific programming.
- 34 U.S.C. 12291(b)(13)

# Special Conditions-Civil Rights Continued

## Violence Against Women Act Reauthorization Act of 2013 / 2022 Continued

- **Sex-Segregated Programming**
  - When males and females receives services in separate settings
- **Sex-Specific Programming**
  - When a recipient designs programming differently for males and females
- **Beneficiaries choose the appropriate program based upon gender identity.**

# Special Conditions-Civil Rights Continued

## Violence Against Women Act Reauthorization Act of 2013/2022 Continued

- **Necessary to the Essential Operation of a Program**
  - Fact-specific inquiry, consider:
    - Nature of the service
    - Consequences to beneficiaries of making
  - sex-segregated or sex-specific
    - Literature on efficacy
    - Impact on transgender clients
- **Reasons may not be trivial, based solely on convenience, or rooted in stereotypes**

# Special Conditions-Civil Rights Continued

## Violence Against Women Act Reauthorization Act of 2013 / 2022 Continued

- Fact-specific inquiry, consider:
  - Nature, quality, and duration of the service
  - Relative benefits of different therapeutic modalities
  - Geographic location

# Special Conditions-Civil Rights Continued

## Violence Against Women Act Reauthorization Act of 2013 / 2022 Continued

- **What is Gender Identity?**
- “Actual or perceived gender-related characteristics” (from Matthew Shepard-James Bird Hate Crimes Prevention Act)
- A person’s internal view of the individual’s gender
- May or may not correspond to sex assigned at birth
- Transgender, male, and female are examples of gender identities

# Special Conditions-Civil Rights Continued

## Violence Against Women Act Reauthorization Act of 2013 / 2022 Continued

### **Serving Transgender Clients**

- Assign clients to service which corresponds to the gender with which the client identifies
- Consider transgender victim's health and safety in making housing assignments
- Transgender client's own views regarding personal safety deserve serious consideration
- Do not isolate or segregate
- Do not make burdensome demands for identity documents
- Do not inquire into surgery or other medical interventions

# Special Conditions-Civil Rights Continued

## Who is Subject to These Laws?

- Any “PROGRAM OR ACTIVITY” that receives financial assistance from the DOJ.
- Program or Activity means all of the operations of an organization receiving federal financial assistance, such as the entire department or office within a state or local government.
- The statutes that the OCR enforce prohibit discrimination in
  - Employment Practices
  - Delivery of Services



# Special Conditions- Civil Rights Continued

## Disability

- Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability by recipients of federal funding.
- Title II of the Americans with Disabilities Act of 1990 prohibits discrimination on the basis of disability and applies to public entities, **whether or not** they receive federal funding.
- American with Disabilities Act Amendment Act of 2008 is an act to “restore the intent and protections of the ADA of 1990.”

# Special Conditions- Civil Rights Continued

## Under Section 504 and Title II of the ADA, handicapped person means any person who:

- has a physical or mental impairment which substantially limits one or more major life activities
- has a record or such an impairment, or
- is regarded as having such an impairment
- DOJ funding recipients must provide reasonable accommodations to the known physical or mental limitations of an otherwise qualified individual with a disability unless a recipient can demonstrate it would be an undue hardship or would fundamentally alter the service or activity.
- Every case requires individualized analysis –individuals with disabilities are not a homogenous group even those with the same disability.

# Special Conditions- Civil Rights Continued

## Under Section 504 of the Rehabilitation Act of 1973:

- A recipient with 50 or more employees and receiving Federal financial assistance from the Justice Department of \$25,000 or more **must**:
  - designate a Section 504 compliance coordinator
  - adopt grievance procedures
  - notify program participants, beneficiaries, applicants, employees, unions, organizations with collective bargaining agreements, that recipient does not discriminate on the basis of disability
  - *Note: For police departments and sheriff's departments who applied under the city or county, this would apply to the county or the city.*

# Special Conditions- Civil Rights Continued

## Religion

### Definitions:

- All aspects of religious practice as well as belief - [42 USC § 2000e\(j\)](#)
- Includes sincerely held moral or ethical beliefs – [29 CFR § 1605.1](#)

### Faith Based Organizations (FBOs)

- Government agencies must remove barriers for FBOs applying for aid
- Government agencies providing financial assistance must not discriminate either in favor of or against FBOs

# Special Conditions- Civil Rights Continued

## DOJ Regulations for FBO Guidance 28 C.F.R. pt. 38

- FBOs must not use direct federal funding to engage in explicitly religious activities
- Explicitly religious activities must be separate in time or location from federally-funded activities, and must be voluntary for those participating in the federally-funded activities.
- FBOs may not discriminate against beneficiaries based on religion, a religious belief, a refusal to hold a religious belief, or a refusal to participate in a religious practice notify program participants, beneficiaries, applicants, employees, unions, organizations with collective bargaining agreements, that recipient does not discriminate on the basis of disability

# Special Conditions- Civil Rights Continued

Funded FBOs do not forfeit Title VII's exemption from religious discrimination in employment. However, the DOJ has determined that on a case-by-case basis, the Religious Freedom Restoration Act may allow subgrantee FBOs to hire based on religion. An FBO must certify:

- It will offer all federally-funded services to all qualified beneficiaries
- Explicitly religious activities will be voluntary and kept separate from federally-funded activities; and
- It is a religious organization that sincerely believes that abandoning its religious hiring practice in order to receive federal funding would substantially burden its religious exercise.

# Special Conditions- Civil Rights Continued

## **Requirements for FBOs**

FBOs must give written notice to beneficiaries and prospective beneficiaries that:

- FBO will not discriminate on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to participate in a religious practice;
- FBO may not require beneficiaries to participate in any religious activities;
- FBO will separate in time and location any privately funded religious activities from federally funded activities; and

# Special Conditions- Civil Rights Continued

## Requirements for FBOs continued

- If a beneficiary objects to the religious character of the FBO, the FBO will undertake reasonable efforts to identify and refer the beneficiary to an alternative provider that is acceptable to the beneficiary.
- Alternative provider must be in reasonable geographical proximity to the FBO and offer services comparable in substance and quality.
- FBO must maintain a record of the referral. If the FBO is unable to identify an alternative provider, it shall notify the SAA or the DOJ.
- FBO must provide this written notice **prior** to the provision of services.
- A sample notice is contained at [Appendix A to 28 C.F.R. pt. 38.](#)
- A sample beneficiary referral request is contained at [Appendix B to 28 C.F.R. pt. 38.](#)



# Special Conditions- Civil Rights Continued

## **National Origin Discrimination**

- Includes discrimination on the basis of Limited English Proficiency (LEP)
- A Limited English Proficient (LEP) person has a first language other than English and a limited ability to read, speak, write, or understand English.

# Special Conditions- Civil Rights Continued

To avoid discrimination against LEP persons, recipients must:

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

# Special Conditions- Civil Rights Continued

## What are reasonable steps? Four Factor Analysis:

1. The *number or proportion* of LEP persons served or encountered in the eligible service population.
2. The *frequency* with which LEP individuals come in contact with the program.
3. The *nature and importance* of the program, activity, or service provided by the program.
4. The *resources* available to the recipient.

# Special Conditions- Civil Rights 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- Civil Rights Continued

## **Five Elements of a Written LEP Policy**

1. A process for identifying LEP persons who need language assistance
2. Information about the available language assistance measures
3. Training for staff
4. Notice to LEP persons
5. Monitoring and updating the LEP policy

# Special Conditions- Civil Rights Continued

## Subgrantees must comply with civil rights laws including:

- completing an EEOP Certification Form and submitting this form and EEOP Utilization Report (if required) to the OCR
- providing notification to employees **and** beneficiaries that the agency does not discriminate and that employees and beneficiaries have a right to file a discrimination complaint with the DAC or the DOJ Office of Civil Rights.
- having a Section 504 Coordinator if it meets the employee and funding threshold
- providing meaningful access to their services to LEP individuals – **for the DAC this includes having a written LEP policy**
- complying with the regulations relating to FBOs ([28 C.F.R. pt. 38](#))
- having written procedures for receiving and processing discrimination complaints from **employees and beneficiaries** of the services the agency provides
  - *Note: for law enforcement agencies that apply under the county or city, the county or city would be responsible for these policies.*

## Special Conditions- Civil Rights Continued

- In the event a Federal or State court or Federal or State administrative agency makes a **FINDING OF DISCRIMINATION** after a due process hearing on the ground of race, color, religion, national origin, disability, sexual orientation, gender identity, or sex against a recipient of funds, the recipient will forward a copy of the finding to the DAC and the Office for Civil Rights, Office of Justice Programs.

## Special Conditions- Civil Rights Continued

# No Retaliation!



# 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.



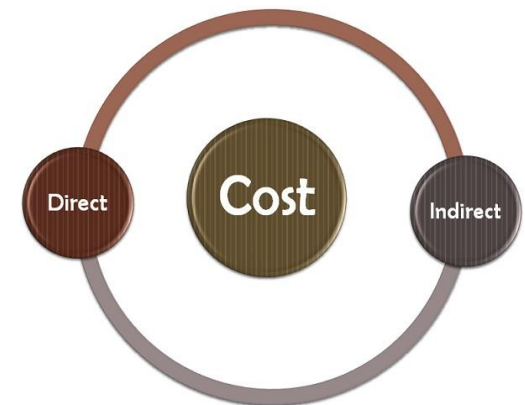
# Financials



- Co-mingling 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
  - For subgrantees paid out of more than one year funding, expenditures and reimbursement must be tracked by each funding year, using the oldest money first. This can be done with separate ledgers or on a spreadsheet. All funding years are listed on a subgrantee's 2 CFR Compliance Letter which can be found in the Uploads Section under Grant Correspondence once the application is in grant awarded status.
  - 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
- *Note: On your MFR, you can only ask for the awarded percentage of that month's expenses in the categories the IDC rate is based upon.*

# Project Information

- Award Period
  - 1/1/2024 to 12/31/2025
- Do **NOT** expend funds before **1/1/2024**.
- Expenditures **MUST** be encumbered, through a purchase order or some other means, before 12/31/2025.
- You have 60 days past 12/31/2025 to pay for those encumbrances.



# Project Information- Continued

- **REQUIRED** to be operational within 60 days of start date – March 1, 2024
- 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 Grant Adjustment Notice (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: 1/1/2024 to 12/31/2024 and 1/1/25 to 12/31/2025**
- **Only** track statistics on the **GRANT-PAID** activities. If the grant funded employee is not 100% grant funded, pro-rate the stats according to the funding percentage.
- Do **NOT** keep statistics for your entire agency for this report.
- Blank report form for you to complete will be e-mailed to you in December.
- Muskie Report Due to DAC
  - **January 31, 2024 (Time period 1/1/24 – 12/31/24)**
  - **January 31, 2025 (Time period 1/1/25 – 12/31/25)**

# 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 and you will be asked to redo that section or provide an explanation to the Muskie School.

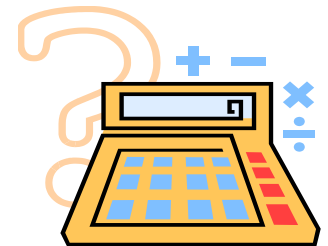


# Muskie – Determining FTE's

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.

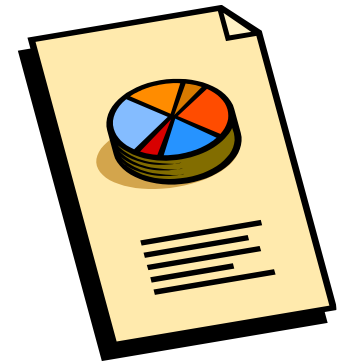
- Example 1: You have one full-time advocate whose salary is 100% funded with grant funds and one full-time counselor whose salary is 25% funded with grant funds. Report them as 1 FTEs under victim advocate and .25 FTEs under counselor.
- Example 2: A staff member, whose salary is 100% funded with grant 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:
  - 1/1/2024 to 6/30/2024 Due: July 31, 2024
  - 7/1/2024 to 12/31/2024 Due: January 31, 2025
  - 1/1/2025 to 6/30/2024 Due: July 31, 2025
  - 7/1/2025 to 12/31/2024 Due: January 31, 2026
- 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



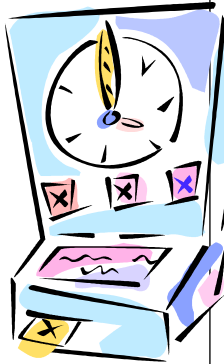
# Claims



- All grants are **Reimbursement Only**.
- For new subgrantees only - I will need a copy of your SASP/VAWA ledger, general ledger, payroll/benefits breakdown, and signed timesheets for grant funded personnel for the first quarter of the Grant as soon as you have submitted your first QFR.
- 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.

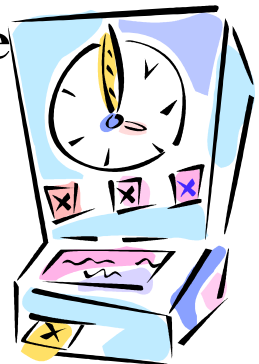
# Expenditures- Personnel

- 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.
- For ALL split-funded employees, I will need a copy of the signed February 2024 timesheet showing their hours split between SASP/VAWA funded and non-SASP/VAWA funded hours. Every time personnel on the grant changes, I will need a copy of the first complete months' timesheet showing split hours.
- 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
  - Columns for grant funded hours and non-grant funded hours if not 100% grant funded, **even if the employee is exempt.**



# 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, 2024                      Due: July 31, 2024
    - July – December, 2024                      Due: January 31, 2025
    - January – June, 2025                      Due: July 31, 2025
    - July – December, 2025                      Due: January 31, 2026
  - 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.
  - *Note, if an employee's start date is different from above, his / her / their certification form will be due six months following the start date.*



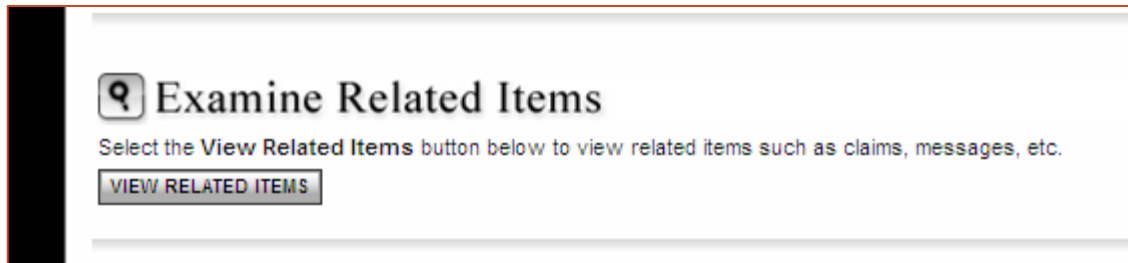
# Expenditures



- 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 to submitted 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
-------	-------------	-----	-----	------------	-------------

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

# 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.

The screenshot displays the MFR system interface. At the top, there is a navigation bar with links: [My Home](#), [My Applications](#), [My Financials](#), and [My Programmatic Reports](#). Below this is a secondary navigation bar with links: [My Reports](#), [My Administration](#), [My Training Materials](#), [My Organization\(s\)](#), [My Profile](#), and [Logout](#). On the right side of the page, there are two buttons: [ADD NOTE](#) and [SHOW HELP](#).

Below the navigation bar, there is a [Back](#) link and the title **DAC Financial Report Menu**. Underneath the title, the document information is displayed: **Document Information:** MFR-2020-Ok Rape Crisis Center-00007-Jun and **Parent Information:** 2020/21-VAWA-Ok Rape Crisis Center-00017. There is also a [Details](#) link.

A table with the following columns is shown: **Info**, **Document Type**, **Organization**, **Role**, **Current Status**, and **Period Date / Date Due**. The table contains one row of data:

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

Below the table, there is a section titled **View, Edit and Complete Forms** with a subtext: "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
- Asking for more IDC than was “earned” during the month

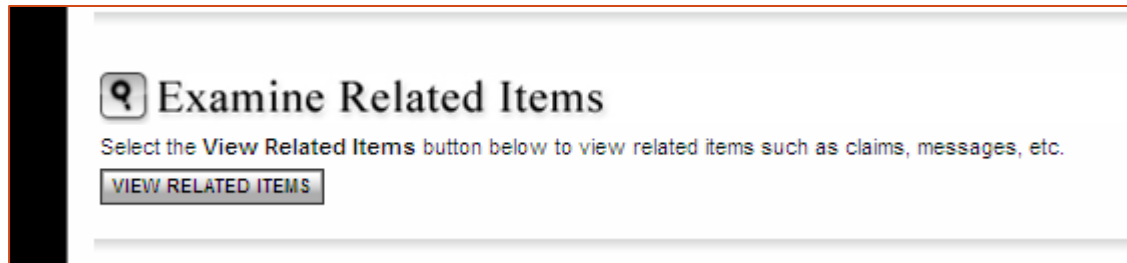


# QFR Reports (Quarterly)

- **Due by 11:59:59 PM on the following dates:**
- January through March **4/15/2024 & 2025**
- April through June **7/15/2024 & 2025**
- July through September **10/15/2024 & 2025**
- September through December **1/15/2024 & 2025**
- Additional Quarter if Necessary **4/15/2026**
  - If funds are encumbered prior to 12/31/25 but paid after Jan. 1, 2026.

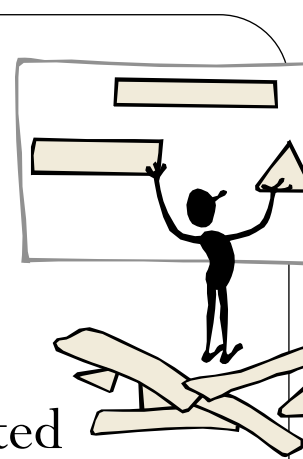


# QFR Reports



- 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, 2025**

# Personnel Changes

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

A screenshot of a web-based form interface for a Grantee Action Notice (GAN). The form has a grey header bar with a dropdown menu labeled "GAN". Below the header, there are two sections: "GAN Grantee Information" and "Modification Comments". Each section has a blue document icon to its left. A red arrow points down to the "GAN Grantee Information" section. The form is set against a light blue background.

# Personnel Changes - Continued

- Personnel Changes for grant funded personnel require a Personnel Change Form to be emailed to the Grant Programs Specialist's attention. The form must also be uploaded to OKGrants in the Uploads Section. Please make sure to put the effective date for change and why the change took place.
- There is a form for VAWA and a form for SASP.
- Changes in personnel **will also require** an updated Determination of Suitability to Interact with Minors
- Changes can be in the grant funded personnel **as well as** changes in the % of grant funding
- If the grant funded personnel is also the Project Director, a GAN will also have to be done
- It may also require a backfill form to be completed and uploaded.
- For DA's offices, you also need to submit a PAF form to payroll.
- *Note – unless the personnel is part time, the FTE on this form is 1 despite funding percentage.*



# 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: \_\_\_\_\_

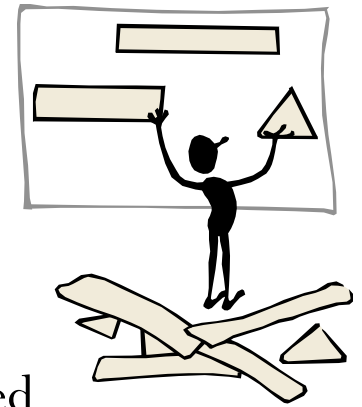
Please list the names of the personnel within your agency whose salaries are funded with SASP dollars. Also, please state the person's title, FTE and the percentage of their time that is paid with SASP dollars. For example, if they are working full-time and their entire salary is paid only with SASP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

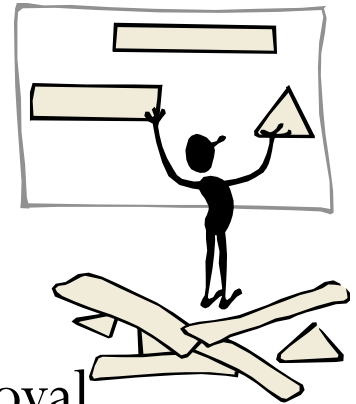
The above information should be provided to DAC and a copy uploaded to [OKGrants](#).  
Mail: DAC, 421 NW 13<sup>th</sup> # 290, OKC, OK 73103  
E-mail: [dac-grants@dac.state.ok.us](mailto:dac-grants@dac.state.ok.us)

# Budget Revisions



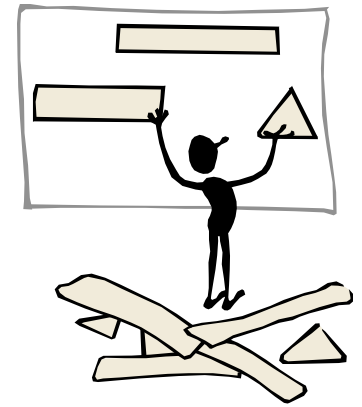
- Budget Revisions are possible
  - Less than 10% of the TOTAL award and within approved categories – no requirements
- More than 10% of the total award or outside of approved categories must get prior approval
  - Must submit a GAN
    - Provide new budget
    - Provide narrative
    - Provide explanation for the revision
- If the revision changes the scope of the project – it requires further approval .
- Submission Deadline: **December 1, 2025**

# 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, 2025**

# Project Period Changes



- Project periods can be extended outside of the 24 month grant period; however, this is very rare.
- 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, 2025**

# 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 grant period.
  - High-risk subgrantees will have priority visits or may have additional visit(s).
    - New PD or FO
    - More than four 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
  - Responding to requests for documents or information in a timely fashion
  - Uploading personnel change forms/ backfill forms/updated minor forms





# Draw Hold



- Used during the grant cycle to address non-compliance
- Used for multiple late or incorrect programmatic and/or fiscal reports
- EXAMPLES:
  - Continuous late QFR or MFRs
  - Failure to submit Muskies or Semi-annual Reports on time
  - Not responding to Corrective Actions from Site Visit Reports
  - Other times when needed
- Drawdowns are not processed when a Draw Hold is in place.
- Repeated Draw Holds are bad and can affect future funding

# 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 award documents
  - Late MFRs and QFRs
  - Late Muskie Reports or Semi-annual Progress Reports
  - Corrective Actions
  - Draw Holds
  - Correspondence Issues



# Compliance Reports - Continued

- **Warning Special Conditions**

- If you have six or more later 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 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 be placed in Death Penalty Status:
  - *The subgrantee will submit all financial and programmatic reports accurately and on time. The subgrantee understands that the submission of **one** late financial and/or programmatic report will result in immediate grant suspension and funds will be forfeited for the remainder of the grant period.*

# 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, either single, independent, or state should be submitted to the DAC as soon as completed and uploaded to the Uploads Section



# 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 to be used for the next grant funding cycle.
  - 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, 2025.

