

**Missouri Department of Public Safety  
Crime Victim Services/ Juvenile Justice Unit**



**2018-2019  
STOP VIOLENCE AGAINST WOMEN (VAWA)  
& SEXUAL ASSAULT SERVICES (SASP)  
GRANT PROGRAM COMPLIANCE  
WEBINAR**

**JANUARY 26, 2018**

# **CRIME VICTIM SERVICES/JUVENILE JUSTICE UNIT**

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**MO Dept. of Public Safety**

**ATTN: CVS/JJ Unit**

**PO Box 749**

**1101 North Riverside Drive**

**Jefferson City, MO 65101**

**573/751-4905**

# VAWA/SASP GRANT SPECIALISTS

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# INTERNAL CONTACTS & CORRESPONDENCE

- All claims, reports, and correspondence will be reviewed by the internal contact designated to your project/program
  - Please contact your internal contact with questions or technical assistance requests related to your project/program.
  - All monitoring activities will be conducted by the internal contact.
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# INTERNAL CONTACTS & CORRESPONDENCE

- Contact Information & Personnel changes MUST be sent to your grant specialist via the Correspondence component in WebGrants immediately
- When sending Correspondence, include your name, your agency name, phone number and email address
- When replying to DPS correspondence, you MUST use the WebGrants Correspondence component; email correspondence will not be accepted
- CCR Updates must be completed by the Subrecipient by updating their agency profile

**AWARD STATUS**



# STATUS OF 2018 AWARDS

- Subaward documents are either in the revision process or in the final approval process
- Approved Subaward documents can be found under “Award Document-Need Signatures” in WebGrants for printing
- The Subaward documents require original signatures of the Authorized Official and Project Director



# RETURNING THE SUBAWARD DOCUMENTS

The following Subaward documents must be mailed to your internal contact, and must include original signatures of the correct Authorized Official and Project Director where applicable:

- **SubAward Document**
- **Certified Assurances**  
**NEW**-Each page of the Certified Assurance must be initialed by the Authorized Official




**PERFORMANCE PERIOD &  
IMPLEMENTATION TIMELINE**


# **2018 – 2019 VAWA & SASP SUBAWARD PERFORMANCE PERIOD**

- January 1, 2018 through December 31, 2019

# PROJECT IMPLEMENTATION

- Projects must be operational within 60 days of the project start date
  - If not operational within 60 days, the subrecipient must report to DPS, via Correspondence in WebGrants, the steps taken to initiate the project, reasons for the delay and the expected start date
  - If not operational within 90 days, a second statement to DPS is required explaining the delay
  - Upon review of the 2nd statement, DPS may terminate the subaward
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# **COMPLIANCE TRAINING OUTLINE**

- **General Grant Program Information**
  - **Administrative & Financial Guidelines**
  - **Certified Assurance/Special Conditions**
  - **Budget/Costs**
  - **Civil Rights Compliance**
  - **Reporting Requirements**
  - **Monitoring**
  - **WebGrants**
  - **Questions**
- 

# GENERAL GRANT INFORMATION

# **GENERAL GRANT PROGRAM INFORMATION**

## **The Violence Against Women Act Grant Program (VAWA)**

**CFDA Number:** 16.588

**Awarding Agency:** The United States Department of Justice, Office of Violence Against Women

**Authorization:** Violence Against Women Act of 1994 (VAWA) and reauthorized and amended by the Violence Against Women Act of 2005 (VAWA) and the Violence Against Women Act of 2013 (VAWA 2013)

**Purpose:** To enhance the capacity of local communities to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women and to develop and strengthen victim services in cases involving violent crimes against women

# **GENERAL GRANT PROGRAM INFORMATION**

## **The Sexual Assault Services Formula Grant Program (SASP)**

**CFDA Number:** 16.017

**Awarding Agency:** The United States Department of Justice, Office of Violence Against Women

**Authorization:** Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA), reauthorized and amended by the Violence Against Women Act of 2013 (VAWA 2013)

**Purpose:** Provides funding to support rape crisis centers and other nonprofit, nongovernmental organizations that provide services, direct intervention, and related assistance to victims of sexual assault.



# GENERAL GRANT PROGRAM INFORMATION

Prior to incurring any expenses or submitting any claims for reimbursement each sub recipient should be familiar with and reference the following documents:


- **DPS Financial and Administrative Guidelines**  
(<https://dps.mo.gov/dir/programs/cvsu/documents/2016-financial-admin-guidelines.pdf> )
- **DPS Sub Recipient Travel Guidelines**  
(<https://dps.mo.gov/dir/programs/cvsu/documents/sub-recipient-travel-policy.pdf> )
- **Certified Assurances**
- **Any Sub Award Specific Special Conditions**




# BUDGET INFORMATION

# **BUDGET INFORMATION:**

## **Budget Categories**

- **Personnel**
  - **Personnel Benefits**
  - **Personnel Overtime**
  - **Personnel Overtime Benefits**
  - **Volunteer Match**
  - **Travel/Training**
  - **Equipment**
  - **Supplies/Operations**
  - **Contractual**
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# **OBLIGATION OF FUNDS:**

- **All subawards operate on a reimbursement basis**
  - **Services/activities/trainings must be completed prior to submitting a claim**
  - **Claims for reimbursement must be submitted with 60 days of occurrence**
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- ▶ Supporting documentation **MUST** be submitted with any Personnel/Personnel Benefits requests for reimbursement (i.e., general ledger, payroll/accounting records, etc.)
- ▶ Regardless of the % of time worked on VAWA or SASP, supporting documentation must be submitted to account for all time worked
- ▶ If Personnel costs (i.e. overtime) are paid from multiple funding sources hours must be clearly reported



# PERSONNEL

## TIMESHEETS–

- ▶ Must be signed by the employee and the supervisor
- ▶ Must document all paid hours (including leave, overtime, etc.) even if it's not charged to VAWA or SASP
- ▶ If non VAWA or SASP time is recorded, please include under non-allowable time
- ▶ Must include time accounting/daily hours charged

**PERSONNEL**

# VAWA LOCAL MATCH

- Minimum 25% match is required for government agencies
- Match may be applied to the same uses as federal funds
- **MUST** be submitted within 60 days from the time match was incurred
- DPS may require adjustments to match reporting throughout the contract period, if deemed appropriate

**VAWA MATCH**

# VAWA VOLUNTEER MATCH

- Match may be applied to the same uses as federal funds
- Staff cannot volunteer their time
- Activity timesheets are required for volunteer match

**VAWA MATCH**



- Funds will NOT be reimbursed prior to the actual travel
- Travel must be by the most practical and direct route with strict adherence to the DPS Sub Recipient Travel Guidelines and the approved budget
- All costs should be reasonable and prudence should be used when making any travel arrangements
- A certificate of attendance or other proof of attendance must accompany any request for reimbursement for training. If a training certificate is not available, a detailed memo with details of the training signed by the Project Director is sufficient

**TRAVEL/TRAINING**





- Requests for reimbursement of pre-approved Travel/Training expenses must adhere to the approved budget. If you foresee any needed expenses not originally approved; you may want to consider a budget revision as expenses not approved in the budget are ineligible for reimbursement
- Miscellaneous training requests must be submitted at least 30 days in advance for pre-approval
- State per diem guidelines must be followed, unless your agency policy is more restrictive

**TRAVEL/TRAINING**

- The per diem associated with the location of where the expense occurred must be utilized
- Mileage expenses must be supported by a log or other tracking system
- Most meal/hotel expenses are only eligible if in a 12-hour travel status

**READ AND BECOME FAMILIAR WITH THE  
DPS SUB-RECIPEINT TRAVEL GUIDELINES AT  
<https://dps.mo.gov/dir/programs/cvsu/documents/2016-financial-admin-guidelines.pdf>**

**TRAVEL/TRAINING**

- Equipment is defined as non-expendable personal property having a useful life of more than one year and an acquisition cost of \$1,000 or more per unit
- Must adhere to the most restrictive procurement policy

**READ AND BECOME FAMILIAR WITH THE  
DPS FINANCIAL & ADMINISTRATIVE GUIDELINES AT  
<https://dps.mo.gov/dir/programs/cvsu/documents/2016-financial-admin-guidelines.pdf>**

**EQUIPMENT**

- Includes expendable property and operating costs
- Costs must be directly related to the project and budget
- Must adhere to the most restrictive procurement policy
- Any printed/media material must be pre-approved and must acknowledge the funding source

**READ AND BECOME FAMILIAR WITH THE  
DPS FINANCIAL & ADMINISTRATIVE GUIDELINES AT  
<https://dps.mo.gov/dir/programs/cvsu/documents/2016-financial-admin-guidelines.pdf>**

**SUPPLIES/OPERATIONS**

- Includes contractual/consultant fees/expenses
- All contractual/consultant services must be supported by contracts stating services to be performed, rate of compensation, and length of the services will be performed, as applicable
- A fully executed contract must be submitted to DPS prior to expenses being reimbursed (and available on-site)
- Must adhere to the most restrictive procurement policy

READ AND BECOME FAMILIAR WITH THE  
DPS FINANCIAL & ADMINISTRATIVE GUIDELINES AT

<https://dps.mo.gov/dir/programs/cvsu/documents/2016-financial-admin-guidelines.pdf>

**CONTRACTUAL**

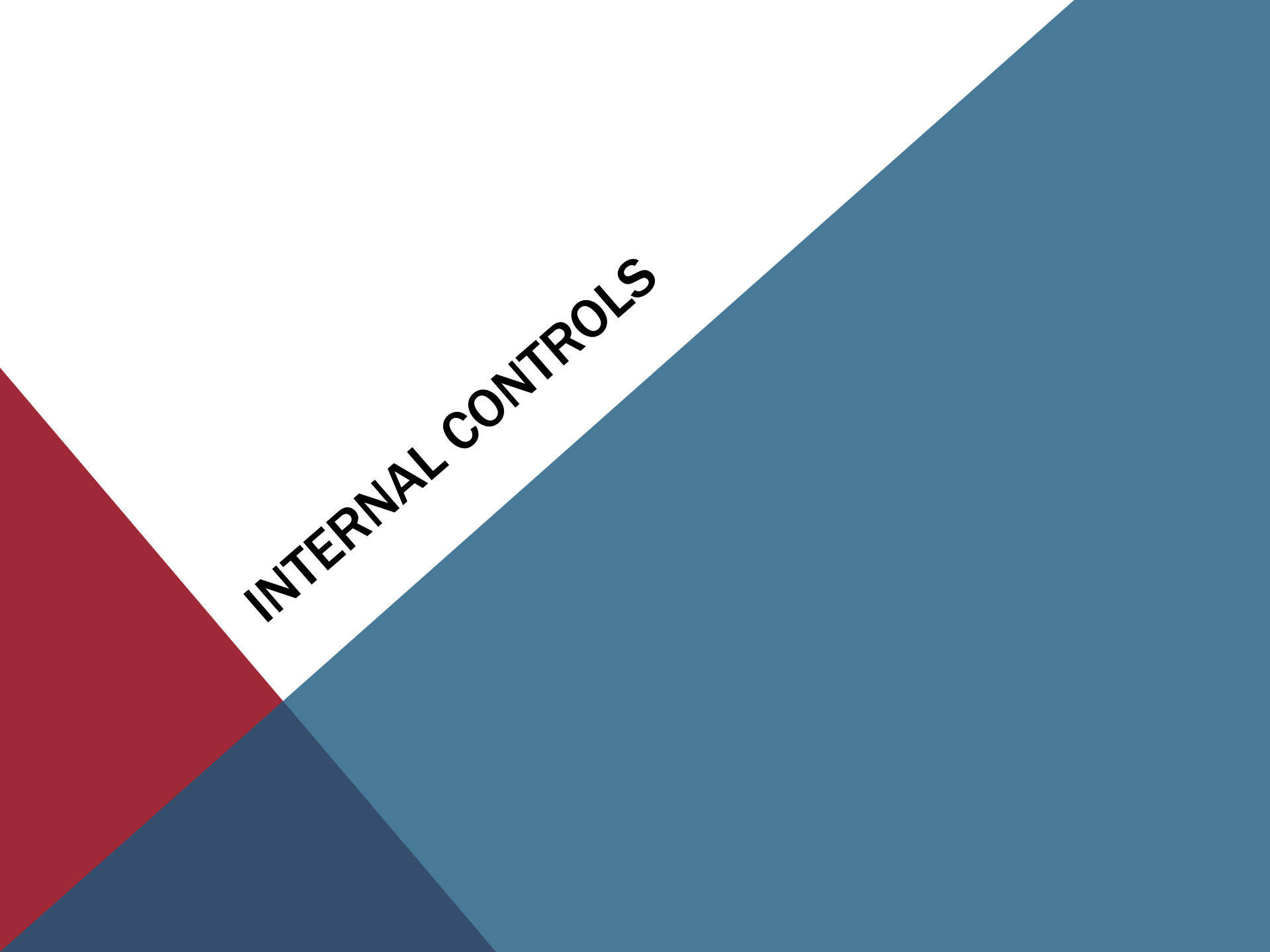


Certain activities are unallowable under the award, for example:

- Legal Services for divorces and/or legal separations
- Lobbying
- Fundraising
- Awareness Activities
- Certain Meals
- Bonuses

READ AND BECOME FAMILIAR WITH THE  
DPS FINANCIAL & ADMINISTRATIVE GUIDLELINES AT  
<https://dps.mo.gov/dir/programs/cvsu/documents/2016-financial-admin-guidelines.pdf>

**UNALLOWABLE COSTS**



# INTERNAL CONTROLS



# SUBRECIPIENT INTERNAL CONTROLS

- Must track, account for, and report on all funds separately from any other funds
- Grant funds may be used in conjunction with other funding as necessary to complete projects but tracking and reporting must be separate
- Should ensure adequate internal controls exist for the programmatic and financial aspects of the program/project



**PROCUREMENT**

# PROCUREMENT

## General :

- All procurement transactions whether negotiated or competitively bid and without regard to dollar value shall be conducted in a manner so as to provide maximum open and free competition
- All quotations and the rationale behind the selection of a source of supply must be retained, attached to the purchase order copy, and placed in the accounting files
- When only one bid or positive proposal is received, it is deemed to be sole source procurement

# PROCUREMENT

## Sole Source:

- Sole source procurement on purchases to a single vendor of \$3,000 or more requires prior approval from the Missouri Department of Public Safety
  - Request for approval shall be submitted via the “Correspondence” component of WebGrants with the rationale and a copy of the sole source certification letter from the vendor, if available
  - Approval of the grant application does not constitute prior approval; must obtain separately



# PROCUREMENT

## State Procurement Policy:

- Purchases to a single vendor totaling less than \$3,000 may be purchased with prudence on the open market
- Purchases to a single vendor totaling between \$3,000 but less than \$25,000 must be competitively bid, but need not be solicited by mail or advertisement
- Purchases to a single vendor totaling \$25,000 or over shall be advertised for bid in at least two daily newspapers of general circulation in such places as are most likely to reach prospective bidders at least five days before bids for such purchases are to be opened

**ACCOUNTING/FINANCIAL  
RECORDS**

# ACCOUNTING/FINANCIAL RECORDS

- Records must be kept in an orderly manner and be available for audit purposes to DPS and/or representatives from the government of the State of Missouri
  - Records must be maintained for 5 years, see Audit Requirements
- Subrecipient is responsible for protecting records against fire, theft, or other possible damages.

# AUDIT REQUIREMENTS



# AUDIT REQUIREMENTS

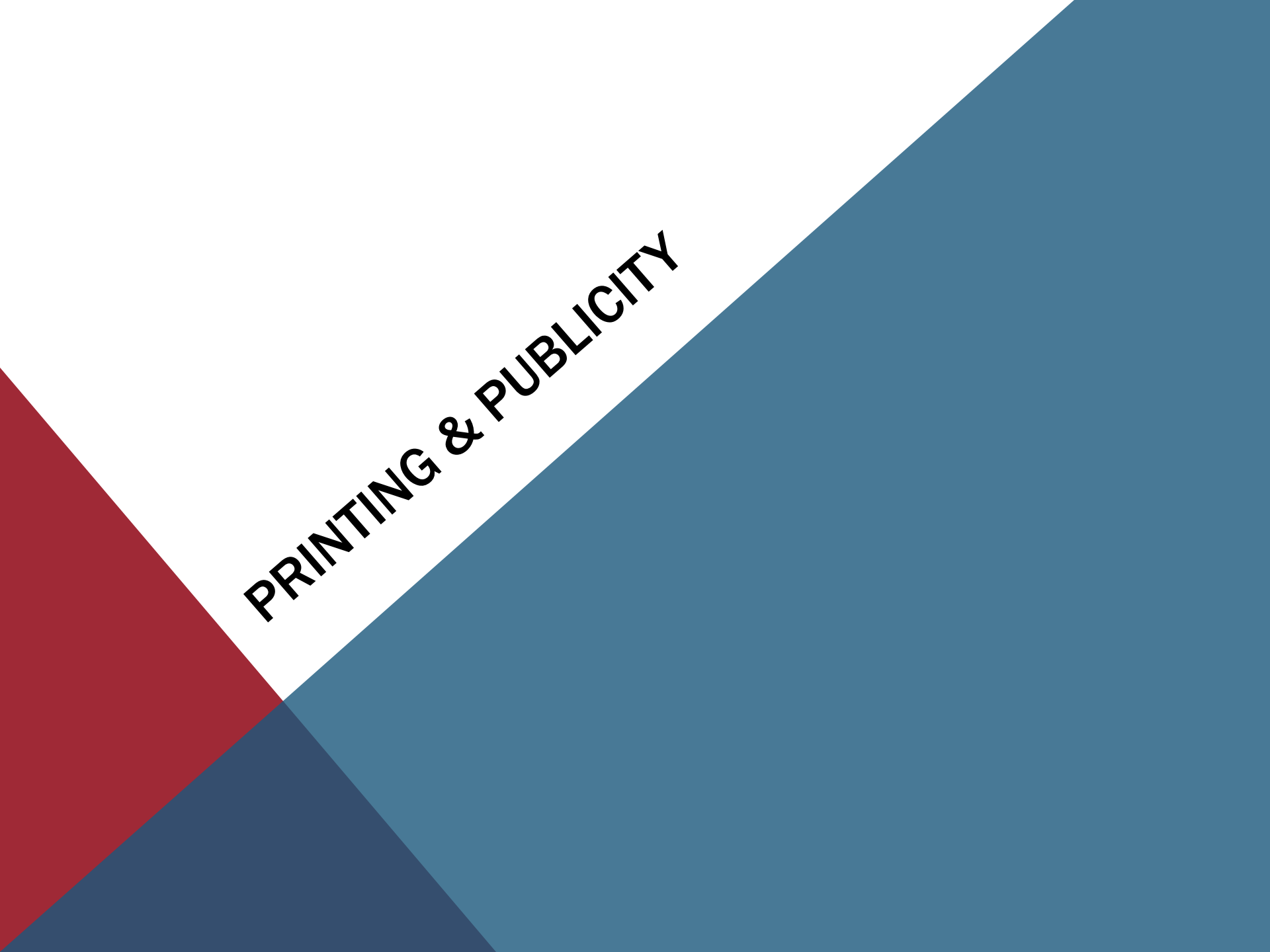
- Comply with OJP Financial Guide, Chapter 3.19, Audit Requirements in accordance with the provisions of Title 2 C.F.R. Subpart F (§ 200.500 et seq.)
- An audit is required if \$750,000 or more is received from federal sources and/or \$375,000 or more in state funds during the fiscal year.





# AUDIT REQUIREMENTS

- An agency audit must be performed by an independent auditing firm
- Audits must be conducted with reasonable frequency, usually annually, but not less frequently than every two years
- Must submit a copy of such audit to DPS via the “Correspondence” component of WebGrants, where possible



**PRINTING & PUBLICITY**

# PRINTING AND PUBLICITY

- DPS encourages recipients of federal funding to share success stories of their project
  - Award of funding
  - Improvements in services provided
  - Educational training
- Subrecipients are required to disclose the source of their funding; prior approval is required and the proper citation will be provided upon request




**CLAIMS**



# CLAIMS

- Monthly Claims are due the 5<sup>th</sup> of each month, unless the 5<sup>th</sup> falls on a weekend or holiday, then the claim is due the immediate next business day
- Monthly Claims must be submitted even if the claim amount is \$0.00
- Payments are generally made around the 25<sup>th</sup> of the month via EFT transaction
  - Payments can be tracked using the State of Missouri Vendor Services Portal at:  
<https://www.vendorservices.mo.gov/vendorservices/Portal/Default.aspx>  
Enter your agency FEIN Number to search payments

# CLAIMS

- Must report actual expenditures
  - Must be submitted via the “Claims” component of WebGrants
  - Expenses must be claimed within 60 days of occurrence
  - All funds must be obligated by no later than 12/31/2019
  - All funds must be expended no later than 02/05/2020
  - Final Claim is due no later than 02/02/2020
- 



# CLAIMS

Can claims be submitted over the budgeted line item?

- Subrecipients are allowed up to a 10% increase within a single budget line without submitting Subaward Adjustment
  - Increases exceeding 10% or moving funds into Personnel/Benefits require a Subaward Adjustment and must be submitted via the WebGrants “Subaward Adjustment” component

# CLAIMS

## Claims submitted with errors–

- If a sub-recipient discovers an error after the claim has been submitted, contact the Internal Contact and request to correct it
- If a claim is submitted with errors, the claim may be negotiated back to the sub-recipient for corrections. If the errors are not corrected after two (2) negotiations, the claim may be withdrawn by DPS and not paid.
- If a Claim is withdrawn due to errors, a correspondence will be sent to the Authorized Official and Project Director.



# CLAIMS

There are several reasons a payment may be paid for less than the requested amount, for example:

- Inadequate or missing supporting documentation
- Ineligible/Unallowable Expenses
- Math Errors
- Expenses not shown on detail sheet
- Monitoring Findings
- End of contract – insufficient balances (federal and/or match)

Refer to the Feedback Section of the claim for information explaining the adjustment

**REPORTING**



# ANNUAL STATUS REPORTS

- Required
- Report 1: Due January 30, 2019
- Report 2: Due January 30, 2020
- Requires accurate data as well as anecdotal information
- Requires use of an outside reporting tool and uploading the completed document into WebGrants
- Late Reports may result in suspension of outstanding payments and/or termination of contract

# SUBAWARD ADJUSTMENTS



# **SUBAWARD ADJUSTMENT REQUESTS**

- Budget Revisions—
  
  
  
  
  
  
  
  
  
  
- Program Revisions—





# SUBAWARD ADJUSTMENT REQUESTS

- Subaward Adjustment requests must be received 30 days prior to the change taking place, and at least 60 days prior to the end of the contract
- A maximum of 3 Subaward Adjustments are allowed during the performance period
- Subaward Adjustments are generally NOT retroactive
- If you are unsure of whether a Subaward Adjustment Request is necessary, contact your internal contact



# SUBAWARD ADJUSTMENT REQUESTS


Changes in Information/Updates that DO NOT require a Subaward Adjustment include:

- Change of Address
- Change of Authorized Official and/or Project Director
  - NOTE: These changes do require official, signed documentation
- Changes in grant staff, unless the budget is impacted
- Budget revisions under 10% per line, excluding Personnel Benefits

**MONITORING**



# MONITORING

- **Purpose of Monitoring**
    - To ensure compliance with federal/state laws, regulations, and guidelines
    - Provide technical assistance
    - Progress toward goals and objectives of the approved grant
  
  - **Forms of Monitoring**
    - Desk Monitoring – reviewing all grant documents, agency policies, reports, and correspondence
    - Site Monitoring – a visit to the agency office(s) to review policies, procedures, records, meet with staff and tour the facility
- 



# MONITORING NOTICE

- **On-Site Monitoring –**
  - Sub recipients will be contacted by DPS to set up an appointment
  - A confirmation letter will be sent through the WebGrants Correspondence to confirm the appointment
  - A Site Monitoring Report **MUST** be completed and submitted prior to the scheduled visit; notice of the date will be provided
  
- **Desk Monitoring –**
  - Sub recipients will be contacted by DPS with instructions



# MONITORING FINANCIAL COMPONENTS

## Personnel-

- payroll records to support salary, overtime, and fringe benefits (*submitted with Claim report*)
- Timesheets (*submitted with Claim report*)

## Travel/Training

- receipts and travel vouchers (*submitted with Claim report*)

## Equipment

- Receipts/invoices from vendor (*submitted with Claim report*)
- bid records and/or sole source letters, where applicable

## Supplies/Operations

- receipts/invoices (*submitted with Claim report*)
- bid records and/or sole source letters, where applicable

## Contractual

- receipts/invoices (*submitted with Claim report*)
- bid records and/or sole source letters, where applicable
- contractual agreements



# MONITORING COMPONENTS

Programmatic monitoring components include a review to determine the program/project is operating with fidelity to the approved nature, scope and budget and adequate contract management as applicable:

- Personnel Files for grant funded staff (applications/resumes)
- Personnel Manual, standard operating procedures
- Local/agency travel policy
- Local/agency procurement/purchasing policy
- Inventory, equipment labeling
- Internal Controls

# MONITORING COMPONENTS

## NOTIFICATON OF MONITORING RESULTS

- You will be notified via WebGrants Correspondence of the results of the monitoring visit, any correction action will be provided with instructions and any application deadlines

# FEDERAL / STATE CIVIL RIGHTS

For more detailed information related to FEDERAL/STATE CIVIL RIGHTS requirements please visit

Federal (DOJ)

<https://www.justice.gov/crt>

Missouri (DOL)

<https://labor.mo.gov/discrimination>



# MONITORING COMPONENTS

## Federal Civil Rights , Equal Opportunity Employment Plan (EEOP)-

- Is your agency required to prepare an EEOP?
- If your agency is required to prepare an EEOP, has your agency prepared an EEOP Utilization Report?
- Regardless, if your agency is or is not required to prepare an EEOP, has your agency completed the appropriate Certification Form and submitted such form to OCR?

# MONITORING COMPONENTS

## Federal Civil Rights , Forwarding Findings of Non-Discrimination

- Does your agency have court findings of discrimination within the project period?
- If so, has your agency complied with the requirement to forward findings of discrimination to DPS, if applicable?





# MONITORING COMPONENTS

## Federal Civil Rights , Non-Discrimination Policies and Procedures-

- How does your agency notify program beneficiaries that it will not discriminate in the delivery of services (e.g. posters, inclusion in brochures, or other program materials)?
- How does your agency notify employees that it will not discriminate in employment (e.g. posters, dissemination of relevant orders or policies, inclusion in recruitment materials)?
- Does your agency have written policies and procedures informing program beneficiaries and employees how to file a complaint if they feel like they've been discriminated against?
- Has your agency designated a person(s) to coordinate complaints of discrimination?

# MONITORING COMPONENTS

## Federal Civil Rights , Access to Services for LEP Individuals

- How does your agency provide meaningful access to persons with limited English proficiency (e.g. direct foreign language communication by fluent bilingual staff, interpretation conducted in-person or via telephone by qualified interpreters, translation by qualified translators, resources for hearing impaired individuals, etc.)?
- Does your agency have written policies or procedures on LEP services?



# MONITORING COMPONENTS

## Federal Civil Rights , Civil Rights Training

- Does your agency provide civil rights training to its employees (e.g. cultural diversity, racial profiling, sexual harassment, etc.)?
- How often does your agency provide civil rights training to its employees (e.g. video and/or trainer; at the time of hire, annually, bi-annually, etc.)?

# MONITORING COMPONENTS

## State Statutes for Civil Rights

### Section 213.055 RSMo – Unlawful Employment Practices

For example:

- Does your agency's job announcements and employment applications include an "Equal Opportunity Employer" statement?
- Does your agency display the required labor law posters  
<http://labor.mo.gov/content/mandatory-posters?>
- Does your agency maintain a written policy on non-discrimination and/or non-harassment in the workplace?
- Does your agency maintain a written policy to notify employees on how to file complaints alleging discrimination?

# MONITORING COMPONENTS

Federal Civil Rights , State Statutes for Civil Rights

Section 213.065 RSMo – Discrimination in Public Accommodations

For example:

- Does your agency display the required labor law posters (<http://labor.mo.gov/content/mandatory-posters>) (e.g. Discrimination in Housing and Discrimination in Places of Public Accommodations)?
- Does your agency notify its citizens or program participants that it will not discriminate in the delivery of its services (e.g. brochures, posters, website, mission statement)?
- Does your agency ensure its facilities are ADA accessible?
- Does your agency maintain a written policy on ADA?
- Does your agency maintain a written policy to notify employees and/or citizens on how to file complaints alleging discrimination in public accommodations?

# QUESTIONS & ANSWERS

