



## Victims Services Grant Program

### Guidance on Budget Amendment Requests

The following guidance is provided to assist Victims Services grant programs with the budget amendment/in-line budget adjustment process. As stated in the DCJS Award conditions, any changes to your budget **MUST** be approved by your DCJS grant monitor in advance of funds being obligated and/or expended. Grantees must properly track the use of award funds and maintain adequate supporting documentation and internal controls to ensure compliance. Any change to the budget whether in-line or between budget categories must be approved.

The availability of excess funds does not warrant that a budget modification is necessary. Funds should only be utilized if there is a documented, well-justified need. The grantee may only charge to the award allowable costs/activities that can be reasonably obligated and/or implemented during the grant award period. Approval in OGMS must be issued prior to obligating or expending funds. Please refer to the appropriate Victims Services grant [guidelines](#) to ensure that the cost is allowed per funding source.

To request a budget amendment, log on to the On-line Grants Management System ([OGMS](#)), open the applicable grant and select Contract Amendments. Refer to the system instructions on screen and/or follow the instructions [here](#).

#### What is a Budget Amendment?

A budget amendment allows grantees to move a portion of the approved budget from one category to another (ex. vacancy savings in personnel to supplies). No more than two (2) budget amendments will be permitted per fiscal year. Budget amendments must be submitted no later than 45 days prior to the end of the grant period, as noted in the special conditions of your award package. Late requests will not be accepted. It is the sub-recipient's responsibility to submit requests in a timely manner in order to avoid conflicts with proposed spending and/or program activities. The budget amendment request must make clear:

- The amount of unspent funds per budget category/item;
- An explanation of why the funds were not spent;
- Where the funds are being moved to and why;
- How the modification will aid in the grantee's ability to achieve project goals;
- Basis of computation and itemization of all costs; and
- Any supporting documentation to show that a cost analysis was conducted.

Refer to the grant program guidelines for details on allowable costs and for budget instructions. All proposed changes must include a description, itemization (basis of computation) and appropriate justification explaining how the request is **allowable**, **allocable**, **reasonable** and **necessary**. Please ensure that the Budget Revision Grid displays the current allocations and that the proposed allocations do not

exceed the awarded amount (refer to the main OGMS budget grid). Double check all figures and ensure that the itemized narrative and any attachments align with the proposed budget amendment. Be sure to round to the nearest dollar. The total amount of the request cannot exceed the total amount awarded. Verify the total award against the Statement of Grant Award (SOGA). If additional space is needed, upload a narrative, quotes, or invoices to support the request. Justification can also include documentation of a cost analysis explaining whether the item is the most cost effective and appropriate use of grant funds. All costs must be reasonably obligated by the end of the award period.

### **What is an example of an adequately justified/itemized request?**

Sample Request: Two mobile hotspots for two Court Advocates to use at our offsite counseling office @ \$234 each = \$468. The area is rural and often the network coverage is unstable making it difficult to communicate clearly and securely with office staff and other victims services providers during service provision. One printer/scanner/copier for shelter staff to print intake screening materials and victims resources for \$602.48 to replace outdated model that is not compatible with other hardware and software upgraded five years ago. Two sets of ink bundles for the printer @\$380 each, projected to last 5-6 months each.

### **What is Reasonable?**

§200.404 Reasonable costs: A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. To further support that a cost is reasonable, please ensure that the request includes details of a cost analysis to show that the item is the most cost-effective method to achieve the stated goal. Inflation, project implementation delays, delays in product availability, should also be documented in the request to substantiate reasonableness. Ensure that the justification explains why certain quantities are necessary (ex. bulk purchases can potentially offer cost savings). Stockpiling supplies, however, at the end of the award period is not allowed. All items must be implemented by the end of the award period.

### **What is the Review/Approval Process?**

For all Victims Services contract amendments, grant monitors have two weeks to review the request. Once the grant monitor and supervisor approves the request, the Grants Management updates the main budget grid in OGMS. Then, the grant monitor will negotiate (unlock) the itemized budget forms (ex. personnel, travel, supplies) so that the grantee can make the necessary revisions. For instructions on how to revise OGMS budget forms, upon approval by DCJS, click [here](#). Once all the forms have been revised, the grant monitor will update the forms as current in the system. Grantees should be advised that this process can take up to 30 days for final approval and budget changes in OGMS. Prior to obligating or expending funds, final approval must be issued via OGMS. To check the status of a request, please refer to the Contract Amendments component.



## **Why was my Request Denied?**

If the request does not explain how the funds became available, where the funds are being moved to and why, and include an adequate description, justification, and itemization of all costs it doesn't meet the requirements. Further, if the request is not allowed by the funding source or cannot be reasonably implemented within the award period, the request will be denied. A request that doesn't meet the requirements can be negotiated (unlocked) by the grant monitor for additional revisions. The monitor will provide details on the reasons why the request was denied and ask the grantee to contact the grant monitor if further guidance is needed. It is imperative that the grantee submit revisions by the specified deadline. Requests that are not corrected by the deadline will be denied. Late requests will not be accepted. Requests that indicate a change in project scope must be submitted through the OGMS Contract Amendment component. We strongly advise sub-recipients to review the budget throughout the award period, determine if there are any variances, identify needs, and submit the request, with sufficient lead time, in advance of the deadline. Requests that require extensive corrections are a potential indication of risk and require additional technical assistance. Demonstration of your understanding of the grant requirements is critically to maintaining compliance.

## **What is an In-Line Budget Adjustment?**

In-Line Budget Adjustments allow grantees to move money within one (1) budget category. In-line adjustments can be reviewed anytime during the grant year. Requests must be submitted and approved by your grant monitor no later than two weeks before the end of the award period and prior to funds being obligated/expended. There is no limit on the number of in-line adjustments per award period. Late requests will not be accepted. Plan accordingly and submit the request with sufficient lead time to avoid delays.

To submit a request for an in-line adjustment, please submit the request in OGMS by selecting "in-line adjustment" in the drop-down box of the Contract Amendment component and include the required information below. As stated above, all budget changes must have an adequate description, itemization, and justification and must be allowed, reasonable, and necessary.

- The amount of unspent funds per budget category/item;
- An explanation of why the funds were not spent;
- Where the funds are being moved to and why;
- How the modification will aid in the grantee's ability to achieve project goals;
- Basis of computation and itemization of all costs; and
- Any supporting documentation to show that a cost analysis was conducted.

## **General Guidance for Budgets and Budget Amendments/Adjustments**

Please note that the following general guidance is provided in an effort to assist with the budget amendment process. The Grant Guidelines for your program can be referenced for more detailed information on how to allocate costs in each budget category. Your grant monitor has the discretion to exercise their judgment in the approval of requests based on whether the request meets the requirements. In addition, the applicable state and federal guidance should always be referenced when there are questions of allowability. All costs in your budget must be **Allowable, Reasonable, Necessary** and **Allocable** (see below definitions).

### **Allowable**

Costs are allowable when they are reasonable, allocable to, and necessary for the performance of the federal award, and when they comply with the funding statute and agency requirements (to include the conditions of the award), including the cost principles set out in the Uniform Requirements 2 C.F.R. Part 200, Subpart E.

### **Reasonable**

Requested costs must be reasonable. The Department of Justice Financial Guide defines reasonable as those costs that a prudent person would have incurred under similar circumstances. In order to determine if a cost is reasonable, all requested budget line items must be itemized. Your grant monitor should be able to easily understand how you arrived at or estimated the requested cost. Attach invoices, quotes, or other supporting documentation to substantiate the request.

### **Necessary**

Requested costs must be necessary to the operation of the program and delivery of services for crime victims. The justification for each requested cost should make the necessity of the item clear.

### **Allocable**

Requested costs must be allocable. A cost is allocable if the goods or services involved are assignable to that Federal award. The justification should make it clear that costs are allocable (e.g. stating that a computer purchased with grant funds will be used 100% of the time by a grant funded staff person). If a cost is not readily assignable to a specific project but is necessary to the operation of the organization/project, it might be an indirect cost. Please see your grant monitor or the grant guidelines for more information about indirect costs.

### **Additional Resources**

DOJ Financial Guide

<https://www.ojp.gov/doj-financial-guide-2022>



Victims Services Grant Program Guidelines

<https://www.dcjs.virginia.gov/victims-services/grants>

VOCA Rule

<https://www.govinfo.gov/content/pkg/FR-2016-07-08/pdf/2016-16085.pdf>