

Virginia Department of Criminal Justice Services (DCJS)

Most Frequently Asked Questions from Sub-Grantees

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Virginia Department of Criminal Justice Services (DCJS)

DCJS Responsibilities as an Awarding Agency

The Department of Criminal Justice Services (DCJS) ensures that sub-grantees comply with all grant conditions. The department develops a risk-based monitoring plan, and conducts fiscal and programmatic monitoring on all sub-grantees, including enhanced monitoring of sub-grantees determined to be medium and high risk.

The Director of DCJS has the authority, under Chapter 1 of Title 9.1, Code of Virginia (§§9-100 through 186.14), to implement policies needed for the operation of the Agency. Grant Monitors and the Grants Administration Staff are responsible for monitoring the activities of sub-grantees to ensure that awards are used for authorized purposes and comply with 2 C.F.R. §§ 200.303 and 200.331, along with other federal statutes, regulations, and the terms and conditions of the awards. The DCJS grant solicitation, subsequent application, and statement of grant award (SOGA) contain all of the required information listed in 2 C.F.R. § 200.331(a).

What is a sub-recipient risk assessment?

A risk assessment is completed by the Grant Monitor before the grant award period begins and/or annually to inform the monitoring plan for the following fiscal year. Grant Monitors will complete a risk assessment using the Grant Monitoring Risk Assessment, which meets the required elements in 2 CFR 200.331(b), to evaluate each sub-grantee's risk of non-compliance with federal statutes, regulations, and the terms and conditions of the award to determine the appropriate level and schedule of sub-grantee monitoring.

How does the agency determine sub-recipient risk?

The risk assessment takes into consideration the following financial and programmatic factors:

- Total dollar amount of grant award
- Timeliness of financial reporting to DCJS
- Results of a Single-Audit
- Date of most recent site visit
- Timeliness of programmatic progress reporting to DCJS
- Turnover of DCJS-funded key staff
- Duration of sub-grantee's grant experience.
- Other issues of non-compliance and recurring or unresolved issues

A weighted numeric value is assigned to each factor, with higher numbers indicating higher risk. Based on the total risk score, sub-grantees will be placed in the risk categories of high, moderate, or low. A score of six or lower is low risk. A score of seven to thirteen is medium risk. A score of 14 or greater is high risk. A sub-grantee's risk level may be adjusted to a higher level based on additional information that DCJS is aware of, including results of other grant monitoring from partner agencies, financial instability, results from previous site visits, recurring or unresolved issues, concerns about internal controls, and financial management issues. These concerns should be documented on the Grant Monitoring Risk Assessment Tool. A completed copy of the risk assessment will be kept in the sub-grantee's file.

What does the risk level indicate about the sub-recipient?

When material risk is identified in a sub-recipient's organization or project, 2 CFR 200.331 requires pass-through entities to implement risk management tools to ensure proper accountability, compliance with program requirements, and achievement of performance goals. Examples of available risk management tools include:

- Providing sub-recipients with training and technical assistance on program related matters.
- More frequent monitoring of programmatic aims or invoices.
- More frequent communication with PI.
- On-site review of the sub-recipient's program operations.
- Stringent review of audits and prompt action when instances of non-compliance are identified.
- Enforcement action for non-compliance, including temporary withholding of payments, disallowing a cost when all or part of the cost is non-compliant, wholly or partially suspending or terminating the sub-award, withholding further funds from the project, or any other legally available remedies.

What is the role of Grants Administration?

Grants Administration Staff will:

- Ensure entity is not debarred (see Debarred or Suspended Procedure and Policy) prior to award and periodically during the award period.
- Analyze audit findings for sub-grantees that are required under 2 CFR § 200.332 (f) to have a completed audit.
- Verify that audits are conducted for sub-grantees that are required under 2 CFR § 200.332 (f) to be audited ("when it is expected that the sub-grantee's Federal awards expended during the respective fiscal year equaled or exceeded the \$750,000 threshold set forth in 2 CFR §200.501 Audit requirements").
- Conduct fiscal desk reviews and on-site monitoring visits based on requests from the grant monitors or coordinators.
- Conduct in-depth financial reviews of programs identified during the fiscal desk reviews and on-site monitoring visits as needing further review.

- Determine corrective action required of the sub-grantee if there are concerns in the audit finding, fiscal desk reviews, or on-site monitoring visits. Work with the Grant Monitor to communicate concerns to the sub-grantee and monitor compliance with corrective action plans.
- Issue management decisions for audit findings relating to DCJS grant funding.
- Enter sub-sub-grantee into FFATA if an award is over \$25,000 (see FFATA Policy).

What is the role of a DCJS Grant Monitor?

Grant Monitors:

- Review quarterly financial and programmatic reports required by DCJS.
- Follow-up with sub-grantees and ensure that sub-grantees take timely and appropriate action on all deficiencies pertaining to the grant award detected through audits, on-site monitoring visits, desk reviews, and other monitoring activities.
- Conduct trainings and/or provide technical assistance for sub-grantees to help administer the grant.
- Evaluate any newly revealed information that may affect sub-grantees' risk score and modify the monitoring plan as necessary.
- Perform pre-award review based on the questionnaire to determine the fitness of subgrantees to receive new grant funds, or perform a risk assessment.
- Coordinate with the DCJS Grants Management Section for the issuance of management decisions for audit findings relating to DCJS grant funding.
- Conduct on-site monitoring visits of sub-grantees to ensure financial and programmatic compliance.

What is an on-site monitoring visit?

Monitoring is the process of reviewing, with staff of a grant-funded project, the project's implementation, activities, performance, and expenditures to determine if it is operating as proposed in the approved grant application and in accordance with grant requirements and conditions, as well as any applicable regulatory requirements, and to identify any technical assistance needs of the grant recipient. Monitoring may include review of the fiscal and programmatic aspects of a grant-funded project. The term "monitoring" is used to describe both the broad overall system of reviewing and tracking the use of federal and state funds, and the more specific day-to-day review processes to assure that a particular sub-grantee complies with federal or state rules and regulations, and is meeting the goals and objectives of the grant.

What can I expect during a DCJS site visit?

Prior to the site visits, the Grant Monitor will send a formal notification letter at least 30 calendar days before the visit to confirm dates and scope of review; provide details of documentation needed for the review; specify expected timeframe for the review; and ensure key officials are available during the visit. The Grant Monitor will also provide the sub-grantee with the Items for Review Checklist (located on the Victims Services page: https://www.dcjs.virginia.gov/victims-services/forms) and request that supporting documentation be compiled by the start of the visit.

During the review, the Grant Monitor will complete the sub-grantee Monitoring Tool and address noted concerns with the sub-grantee. The Grant Monitor will track each step followed during the review process, document conversations with sub-grantee staff, and inspect the progress of the project/program. At the end of the on-site monitoring visit, the Grant Monitor will meet with key officials to present the tentative findings noted from the financial review. After the on-site monitoring visit, the Grant Monitor will issue a Post-Review Letter to the sub-grantee within 60 calendar days documenting recommendations for corrective action and requiring the submission of a corrective action plan within 45 calendar days by the sub-grantee, if necessary.

How often are site visits conducted?

For sub-grantees determined to be high risk, DCJS staff will conduct an on-site monitoring visit annually. For sub-grantees determined to be medium or low risk, DCJS staff will conduct on-site monitoring every two years.

How far back should records be maintained?

Records pertinent to the award must be retained for a period of three (3) years from the date of submission of the final expenditure report. Sub-grantees must provide access, including performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated in 2 C.F.R. 200.333.

A file shall be kept on each sub-award. The file should reflect the sub-award number and should at least contain the following:

- Supporting documentation of any expenditures pertaining to this sub-award (i.e., original receipts, invoices, etc.);
- Documentation of employee and volunteer timesheets pertaining to the sub-award;
- Signed copies of any contract supported by the sub-award;
- Documentation for sub-award matching funds;
- Indirect cost rate;
- Property records of equipment purchased with grant funds, including serial numbers; and
- Other pertinent information (i.e., correspondence with DCJS, budget revisions, special conditions, etc.)

Award Acceptance & Special Conditions:

How do I accept my agency's award?

Print and read the Grant Award Package and Special Conditions in their entirety. To accept the terms and conditions of the award, the Project Administrator must sign the award acceptance and email it to **grantsmgmt@dcjs.virginia.gov**. The award acceptance, also known as the Statement of Grant Award (SOGA), must be received by DCJS within the initial 60 days of the award period.

Does the award have to be signed/returned before I can access grant funds?

The award acceptance must be received prior to funds being disbursed. To check the status of the award acceptance, logon to GMIS.

What is the grant period of performance?

The Uniform Guidance in 2 CFR 200.77 defines "period of performance" as the time during which the non-Federal entity (sub-grantee) may incur new obligations to carry out the work authorized under the Federal award. The period of performance represents the one-year period for which the award was made. The Grant Award Package (Statement of Grant Award) provides the award period for each grant (eg. July 1, 2019-June 30, 2020).

How do I obtain payment?

To obtain payment, the Financial Officer must contact grantsweb@dcjs.virginia.gov to request access to the Grants Management Online Information System (GMIS).

What are special conditions and do they have to be completed before I can access grant funds?

A special condition is an item included in the Notice of Grant Award that requires the grantee to accomplish certain tasks or meet certain requirements within a particular period of time in order to comply with the terms of the grant. It is important that you review the conditions carefully as some might require action before funds will be disbursed.

How will I know when my special conditions have been met?

To check the status of special conditions, logon to GMIS and select View Status. Then select, Special Conditions. If you have questions about the status, contact your Grant Monitor.

What is the turnaround time for approval of special conditions?

Typically, all award conditions are reviewed within ten (10) working days. If the submission meets all requirements, the Grant Monitor sends approval to Grants Administration. Grants Administration then processes the approval (i.e. enters the approved budget in GMIS, checks off all un-met conditions). Sub-recipients receive notice of approval via email. If the submission does not meet with approval, the Grant Monitor will contact the sub-recipient to request additional information.

What is the System for Award Management (SAM) and why is it required?

The System for Award Management (SAM) (https://www.sam.gov) is a federal government website that serves as a central registration point for government contractors. Sub-grantees must register in SAM in order to receive an award, and must maintain an active registration for the entire period of the award.

What is the Civil Rights Compliance Training Requirement?

The Office on Civil Rights (OCR) offers civil rights training to assist sub-recipients in meeting their federal civil rights obligations. The online training, which consists of six segments and self-

tests, provides an overview of applicable non-discrimination laws and the general civil rights obligations that are tied to grants awarded by the Department of Justice. The civil rights training modules offered through OCR can be accessed at https://ojp.gov/about/ocr/assistance.htm. The sub-grantee must review these training modules at least once per grant cycle and must view the civil rights overview, standard assurances modules, and the module on obligations to provide services to Limited English Proficient (LEP) individuals.

What is the Equal Employment Opportunity Plan (EEOP)?

As a recipient of Department of Justice funding, all sub-recipients must comply with the requirements regarding Equal Employment Opportunity Plans (EEOP). In certain cases, sub-recipients must develop an EEOP. Your organization is required to submit a Certification Report and/or the Utilization Report section of your plan to the Office of Civil Rights. Further guidance can be found at https://ojp.gov/about/ocr/eeop.htm . The Certification form required by OJP can be found at http://www.ojp.usdoj.gov/about/ocr/pdfs/cert.pdf .

How can I request extensions for grant requirements (i.e. special conditions, project implementation, financial and/or programmatic reports)?

Within 60 days of the starting date of the grant, the sub-grantee must initiate the project funded. If not, the sub-grantee must report to DCJS, in writing, the steps taken to initiate the project, the reasons for the delay, and the expected starting date. If the project is not operational within 90 days of the start date, the sub-grantee must obtain approval in writing from DCJS for a new implementation date or DCJS may cancel and terminate the project and redistribute the funds.

Sub-grantees can request up to two (2) report extensions during the award period. To submit a request, contact your Grant Monitor and provide the reasons for the delay in reporting as well as an anticipated date of when the report will be filed. All requests must be submitted before the reporting deadline.

Financial Management:

What are the standards for financial systems?

According to the Department of Justice (DOJ) Grants Financial Guide, all sub-recipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. Recipients must have a financial management system in place that is able to record and report on the receipt, obligation, and expenditure of grant funds. Accounting systems should be able to account for award funds separately (no comingling of funds). An adequate accounting system allows recipients to maintain documentation to support all receipts and expenditures and obligations of federal funds. Keep detailed accounting records and documentation to track all of the following information:

- Federal funds awarded
- Federal funds drawn down
- Matching funds of State, local, and private organizations, when applicable
- Program income

- Sub-awards (amount, purpose, award conditions, and current status)
- Contracts expensed against the award
- Expenditures

Please consult **Subpart D of 2 C.F.R. Part 200**, including 2 C.F.R. § 200.302, for more information.

What are direct costs?

Direct costs are "those costs that can be identified specifically with a particular sponsored project relatively easily with a high degree of accuracy." For example, the salary of a direct service provider or the purchase of specific supplies for a specific project are direct costs.

They must be:

- Allowable (as described by federal cost principles and according to federal regulations and grant guidelines)
- Reasonable (what a prudent person would spend);
- Allocable (limited to that portion of expenses directly benefiting the project and consistently treated as direct charges).

What are indirect costs?

Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. Direct cost of minor amounts may be treated as indirect costs under the conditions described in §200.413 Direct costs paragraph (d). After direct costs have been determined and assigned directly to awards or other work as appropriate, indirect costs are those remaining to be allocated to benefitting cost objectives. A cost may not be allocated to a federal award as an indirect cost if any other cost incurred for the same purpose, in like circumstances, has been assigned to a federal award as a direct cost. Indirect costs are frequently referred to as overhead expenses. Examples of indirect costs are: accounting and legal expenses, administrative salaries, office expenses, rent, security expenses, utilities, and telecommunications.

What is an indirect cost rate?

An indirect cost rate is a tool for determining the proportion of indirect costs each program should bear. It is the ratio (expressed as a percentage) of the indirect costs to a direct cost base. Organizations who wish to request indirect costs, that already have a negotiated rate with a federal cognizant agency, must use that negotiated rate in the grant application request, if indirect costs are requested. If the negotiated rate is expired, the applicant can apply for a one-time extension of up to four years without further negotiation. Application for an extension has to be made through the cognizant federal agency that initially negotiated the indirect cost rate. Non-federal organizations that have never had a negotiated indirect cost rate, and governmental departments or agencies that receive less than \$35 million in direct federal funding per year and do not have a negotiated rate, may use the 10% de minimis indirect cost rate based on the organization's modified total direct costs (MTDC).

How can I request indirect costs?

You do not have to request indirect costs, but if you choose to, it is allowable. You have two options when requesting indirect costs: using a formal Indirect Cost Rate Agreement (ICRA) or using a "De Minimis" rate. The ICRA is a formal rate agreement that an organization has applied for and received from the federal cognizant agency (DCJS does not approve ICRAs). Organizations must have a letter or other documentation that lists the federally-negotiated rate. The "De Minimis" rate can be used by organizations that have never had a federally-approved Indirect Cost Rate Agreement. Organizations can use a rate of up to 10% of the Modified Total Direct Costs (MTDC) of their budget for indirect costs.

What is the Modified Total Direct Cost (MTDC)?

Modified Total Direct Costs (MTDC) is the base to which indirect costs rates are applied. MTDC includes direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward. MTDC excludes equipment, capital expenditures, charges for rent, tuition remission, participants support costs and the portion of each subaward in excess of \$25,000.

How do I determine the Modified Total Direct Cost (MTDC)?

To calculate indirect costs, you must first determine the Modified Total Direct Costs (MTDC) amount of your budget. Indirect costs that can be requested are not based on the entire project budget, but on the MTDC amount. Use the MTDC Worksheet

https://www.dcjs.virginia.gov/content/mtdc-worksheet to calculate your MTDC amount. The Worksheet will also calculate the amount of indirect costs that you can request. the MTDC Worksheet must be completed each quarter, based on actual expenses. The actual MTDC amount will determine the amount of Indirect Costs to be reimbursed for that quarter. In other words, the amount of Indirect Costs reimbursed should/will vary from quarter to quarter. The amount of Indirect Costs requested for reimbursement each quarter cannot simply be the total for the year divided by four; the amount must be based on actual MTDC amounts. The MTDC Worksheet should be emailed to grantsmgmt@dcjs.virginia.gov each quarter.

Match

Why are matching funds required for some grants and not others?

Matching funds are the non-federal share of costs that the grantee or the sub-grantee are required to contribute to accomplish the purposes of the grant. The primary reason is to share the costs of various government programs across jurisdictions or with the private sector. Funders sometimes structure match requirements to promote sustainability of projects past the life of the grant program.

What can we use to meet our match?

All matching funds on awarded grants must be:

- Verifiable in program/organization records and provided for in the approved budget;
- Derived from non-federal funding sources;

- Not used as matching funds in other areas;
- VOCA-allowable costs;
- Necessary and reasonable for efficient accomplishment of project objectives;
- In compliance with all federal and state guidelines; AND
- Of an appropriate percentage.

What is cash match?

Cash match is either the grantee organization's own funds (general revenue) or cash donations from non-federal third parties (i.e. partner organizations), or by non-federal grants. A cash match contribution is an actual cash contribution. Cash used as match may be obtained from other state (non-DCJS), local, program income, or private sources. Cash funds cannot be derived from federal sources. Once funds are committed to match for this project, they cannot be used for match in other areas.

What is in-kind match?

In-kind match is typically in the form of the value of personnel, goods, and services, including direct and indirect costs. Some examples include: volunteered professional services, materials/equipment, space and facilities, non-federally funded program activities, etc. Sub-grantees must document the contributed resource of value for all forms of in-kind match. For specific guidance regarding match requirements, please refer to the Victims Services Grant section online and select the specific grant program.

How do I properly document matching funds?

The system of policies and procedures for valuing, documenting, recording, processing, and reporting in-kind match is similar to the process used for tracking all organizational expenditures. The first step in establishing a match tracking system is the development of a match budget. This projected budget outlines how much is cash and how much is in-kind. Creating cost centers to report cash match provides a straightforward tracking method.

Grant recipients must maintain records that clearly show the source, the amount, and the period during which the match was allocated. In-kind contributions are determined at their fair market value. The basis for determining the value of personal services, materials, and equipment must be documented and to the extent feasible, supported by the same methods used by the grantee for its own paid employees. Volunteer services used as in-kind match are allowable and recommended. Volunteer services may be professional or technical services, consultants, or skilled/unskilled labor assisting on the project. Records must be maintained documenting all volunteer services used as in-kind match.

For additional guidance on the value of volunteer time, go to <u>www.independentsector.org</u> /volunteer_time. Non-compliance with documenting in-kind match amounts may result in a requirement to provide cash match, a reduction to the grant award, and/or other grant conditions.

Audit Requirements:

Am I required to complete a single audit?

If the sub-grantee is a local government or non-profit organization and expends \$750,000 or more in federal awards (from all sources) during its fiscal year, the sub-grantee is required to submit the appropriate single or program specific audit in accordance with the provisions outlined in **2CFR Part 200 Subpart F**.

What are the objectives of a single audit?

Single audits serve multiple purposes. In general, besides reporting on the fair representation of the financial statements, they are implemented to determine if the entity has complied with direct and material compliance requirements for each major federal program. They are used as a report card by federal funding agencies and pass-through entities to address problems and also used to provide assurance regarding compliance and information about a non-federal entity's internal control over compliance.

What is a financial statement review?

A financial statement review is conducted by an independent auditor, but is narrower in scope and less rigorous with respect to the level of examination and analysis than a financial statement audit. The auditor examines the organization's financial statements and determines whether they are consistent with generally accepted accounting principles. The auditor's report is intended to provide a limited level of assurance that the financial statements are free of misrepresentations.

Grants Management Online Information System (GMIS):

How do I gain access to GMIS?

If you have been assigned the Finance Officer position on a DCJS awards, you should submit a request for access to **grantsweb@dcjs.virginia.gov.** Please allow 3-5 business days for a response back. If you are a user needing access to upload progress reports, request funds, and/or maintain financial information, you will need to contact your Finance Officer.

Who manages users in GMIS?

For DCJS auditing purposes, the Finance Officer for the grant and/or locality manages the user list in GMIS. They can add or delete users from their profile as necessary.

In addition, if any of the three contacts listed on the Grant Application face sheet changes, the sub-grantee is required to submit a Program Update Form (signed by the Project Administrator) to DCJS notifying us of the change. The form should then be submitted to your Grant Monitor and grantsweb@dcjs.virginia.gov.

Can one person submit a request for funds, approve the request and accept funds?

Although for auditing purposes we do not recommend this process, yes, this is allowable in the GMIS online system.

Can multiple people manage the award in GMIS?

Yes, you may assign different persons to work on the programmatic side and the financial side. There is no limit on the number of users you can have or the number of persons working in the grant at the same time performing different functions.

What happens when a staff person leaves the agency? Should I remove them from GMIS and if so, how?

Yes, users who are no longer affiliated with the organization should be removed from the system immediately by the Finance Officer. As Finance Officer, you are responsible for maintaining your online GMIS list of users. To do that, log into the GMIS website and click on the Financial Officer: Manage Users link under Additional Option.

Who do I contact for technical support with GMIS?

For technical assistance email GMIS Technical Support at **grantsweb@dcjs.virginia.gov**. You may also call the DCJS Main Line at 804-786-4000 Option 2. To reach Grants Administration, choose Option 3.

Financial Reporting:

How do I submit a financial report?

All reports must be submitted through the Grants Management Online Information System (GMIS) https://grants.dcjs.virginia.gov/. When you log on to the system, select Quarterly Reporting and Financial Reports. Reported expenditures may not exceed approved budgeted amounts within budget categories. You may only charge to the award allowable costs incurred during the grant award period. After submission, the Financial Officer will be sent an email for approval. For financial assistance with GMIS contact, Bill Dodd, bill.dodd@dcjs.virginia.gov or 804.371.0638 or Mark Fero, mark.fero@dcjs.virginia.gov or 804.225.2782.

What types of supporting documentation do I have to maintain onsite?

Sub-grantees must properly track the use of award funds and maintain adequate supporting documentation for all paid grant and match staff and volunteer time reported. Source documentation must be retained and be available for inspection for all grant funded expenditures. Sub-grantees may be subject to additional financial and programmatic on-site monitoring, which may be on short notice, and agrees that it will cooperate with any such monitoring.

How do I record and report match?

For awards comprised of Federal Funds and required Match, the percentage of Federal Funds expenditures must not exceed the percentage stipulated in the award, even if the full award amount is not expended.

When is the final financial report due?

The sub-grantee agrees to submit a final financial report and return all received and unexpended grant funds to DCJS within 45 days of the end of the grant award period.

When do I mark the final financial report as final?

The final financial report should be marked as final when all grant expenditures have been reported.

Can I make revisions to a report? How?

To make revisions to financial reports, select Revise Quarterly Reports. Select the reporting period and current year. Then click the Revise button for the report you would like to revise. For financial assistance with GMIS contact, Bill Dodd, bill.dodd@dcjs.virginia.gov or 804.371.0638 or Mark Fero, mark.fero@dcjs.virgnia.gov or 804.225.2782.

Requesting Funds:

Can I request all of the awarded funds at one time?

Disbursement of funds will occur on a cost reimbursement basis for actual funds expended. Actual expenditures should be reported quarterly and invoiced pursuant to approved line item budget categories in the grant award package. Grantees will only be reimbursed for costs that have been incurred within the grant period. Grant funds, including matching funds, may only be expended and/or obligated during the grant period. All obligations must be fulfilled no later than 90 days after the end of the grant period. Requests for reimbursement shall be submitted through DCJS GMIS.

How do I submit a request for funds?

All requests must be submitted in GMIS. To submit a request, select Applications and then Request for Funds. Drawdowns cannot be processed until all quarterly financial and programmatic reports have been approved.

What is the timeframe for receiving funds?

All requests are processed within (30) working days. To check the status of a request, please logon to GMIS.

Why was my voucher denied?

The most common reasons vouchers are denied are: (1) the award was not accepted and Special Conditions of the grant have not been met; (2) there is no approved budget in GMIS; (3) the financial and programmatic reporting requirements have not been fulfilled; (4) the amount requested exceeded what was available; (5) the amount requested exceeds the reported expenditures; (6) the award period has passed and closeout was initiated.

Who should I contact for the status of pending voucher requests?

For questions about financial reporting and requesting funds, please contact Mark Fero, Grants Compliance Supervisor, **mark.fero@dcjs.virginia.gov** or 804.225.2782.

Budget Revisions

What is a budget amendment?

A budget amendment allows you to move any portion of your award amount from one category to another. All sub-recipients must obtain approval from DCJS for any amendment requests prior to the change being implemented.

What is the timeframe for approval of budget amendments?

Budget amendments are reviewed by the Grant Monitor within (10) working days. The approval process can take up to (21) working days depending on whether additional revisions are requested. To check the status of a budget amendment request, logon to GMIS. Once approved, the sub-recipient will be notified via email and the budget will be updated in GMIS.

What are the deadlines for budget amendment requests?

All amendment requests for VOCA funded programs must be submitted at least 45 days prior to the end of the award period. For VAWA and SASP grants, requests must be submitted within 60 days of the end of the award period. Requests submitted after the project end date, or those that would require retroactive approval, will be denied, unless DCJS grants an exception based on extenuating circumstances.

How many budget amendments are allowed?

No more than two (2) budget amendments will be permitted during the grant period.

What are the required forms to submit a budget amendment request?

The budget amendment narrative supplements the revised budget and must be uploaded in GMIS with the amendment request. The narrative form is located on the Victims Services page: **https://www.dcjs.virginia.gov/victims-services/forms.** The purpose of the budget amendment narrative is to explain why the change is being requested and to itemize the changes. In the narrative, please indicate how much money you are requesting to move in a category and indicate if the request is increasing or decreasing the amount from the most recently approved budget. Then provide justification and itemize (describe/list the items, quantity, unit cost, total amount).

Example: Funds are requested to conduct up to 4 training sessions using the National Organization for Victim Assistance (NOVA) evidence-based coordinated community response protocols. The target audience includes law enforcement, medical forensic staff, victim advocates, school personnel, licensed counselors, and other agency partners. The purpose of the training is to enhance access to services for victims of crime. Training programs will provide: a copy of the NOVA accredited curriculum guidebook (\$35/book) and access to NOVA's online resource center for continuing education credits and additional victim-centered resources. Training sessions will be offered in (4) locations throughout the state of Virginia to an estimated 50 participants (4 sessions/year x 50 participants/session @ \$35 / participant=\$7000).

How can I determine if a cost is reasonable, allocable, allowable, and necessary?

According to 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 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. A cost is allocable to a particular sponsored project if the goods or services involved are chargeable or assignable to the project in accordance with the relative benefits received. For more information on cost principles, allowable costs, etc. please refer to the grant program guidelines for the specific award.

Where can I find the required forms to submit a budget amendment request?

All forms are located on the Victims Services page https://www.dcjs.virginia.gov/victims-services/forms.

If I am not moving funds out of one budget category to another category, do I have to submit a budget amendment request in GMIS?

No. Sub-recipients that need to move funds *within* a budget category can submit an in-line budget adjustment request via email to their assigned Grant Monitor.

Why was my budget amendment request denied?

The most common reasons budget requests are denied are: (1) the request was submitted after the deadline; (2) the revised budget does not agree with the narrative; (3) the request includes items that are unallowable or unreasonable according to grant guidelines; (4) the request was not submitted on the approved form or in the correct format.

Returning Funds:

Can I spend funds after the grant cycle is over?

All funds must be expended and/or obligated by the end of the award period. On occasion, subgrantees may incur obligations or encumber funds toward the end of a subaward period for which payment cannot be made until after the subaward period has ended. In such cases, subgrantees should only report the actual expenditures paid during the reporting period. Obligations made prior to the end of the subaward period, but not yet paid, can be reported on the financial report. Agencies will then have an additional 45 days to pay those obligations and report the expenditure on the final financial report.

How do I return unexpended funds to the agency?

To return unexpended funds, please make a check made payable to "Treasurer of Virginia" (note the grant number on the check or in correspondence) and send it to:

Virginia Department of Criminal Justice Services 1100 Bank Street 12th Floor, Finance Section Richmond, Virginia 23219

If I return funds, will that reduce my award for the next year?

No.

Eligibility for Future Funding:

If I am delinquent in financial and/or programmatic reporting, am I eligible for continuation funding?

In accordance with a Criminal Justice Services Board policy, applicable to all DCJS grant programs, no current recipient of funding will be considered for continuation funding if, as of the grant application due date, any of the required Financial and Progress reports for the current grant are more than 30 days overdue. For good cause, submitted in writing, DCJS may waive this provision.

Program Staff Changes:

When do I need to notify DCJS of program staff changes?

In adhering to the requirements and conditions of our grants, grant recipients must submit a Program Change Form to DCJS within thirty (30) days for grant funded personnel changes or if changes in the Project Administrator, Project Director, and/or Finance Officer occur (positions are vacated and subsequently filled). The Project Administrator position is the signing authority required for our grants and by accepting the grant award, he/she assumes full responsibility for the management of all aspects of the grant and activities funded by the grant.

Therefore, DCJS requires that the Project Administrator notify us of any staff changes specifically for the Project Administrator, Project Director, and/or Finance Officer positions. For those positions, the Project Administrator's signature is required. Grant-funded staff changes can be documented on the Program Update Form, and do not require a signature. Please note, the form must be completed and emailed to your DCJS Grant Monitor. The new form can be found here: http://www.dcjs.virginia.gov/grants/forms.

How do I submit program staff changes to DCJS?

All forms are located on the Victims Services page: https://www.dcjs.virginia.gov/victimsservices/forms. Email the completed form to your DCJS Grant Monitor.

Which changes require a signature?

Changes to the Project Director, Project Administrator, Finance Officer require signature by the Project Administrator.