

Sexual Assault Services Program (SASP) New Grant Orientation

July 2023



DCJS

Virginia Department of Criminal Justice Services

SASP Funds

- Administered at the federal level by the U.S. Department of Justice's Office on Violence Against Women (OVW).
- Supports rape crisis centers and other nonprofit, nongovernmental organizations or tribal programs that provide direct intervention to victims of sexual assault.

SASP Funds

- SASP grant funding runs on a calendar year with solicitations generally open in late July or early August.
- For State Fiscal Year (SFY) 2024, there is a Special Funding Opportunity. This is a 12-month grant.
- Match is not required. It should not be incorporated into the budget nor reported.

SASP Funds, Purpose

- Pursuant to 34 U.S.C. §12511(1), funds under this program must be used to provide intervention and related assistance to:
 - Adult, youth, and child victims of sexual assault.
 - Family and household members of such victims.
 - Those collaterally affected by the victimization (e.g., friends, coworkers, classmates), except for the perpetrator of such victimization.

SASP Funds, Priority Areas

1. **24-hour hotline** services providing crisis intervention services and referral.
2. **Accompaniment and advocacy** through medical, criminal justice, and social support systems, including medical facilities, police, and court proceedings.
3. **Crisis intervention**, short-term (one year or less) individual and group support services, and comprehensive service coordination and supervision to assist sexual assault victims and family or household members.
4. **Information and referral** to assist the sexual assault victim and family or household members.
5. **Community-based**, culturally specific services and support mechanisms, including outreach activities for underserved communities.
6. **Development and distribution** of materials on issues related to the services described in numbers 1 through 5 above.

SASP Funds, Eligibility

- Subgrantees may not deny services based on age.
- Maintain statutorily-required civil rights statistics on victims served by race or national origin, sex, age, and disability.
- Provide services to sexual assault victims at no charge.
- Maintain confidentiality of victim information.
- Be in good standing with all state and federal agencies with which they have had an existing grant or contractual relationship.
- Where appropriate, all applicants must hold current professional and state licenses and certifications.
- Have a current SAM registration and Unique Entity Identifier (UEI) Number.

SASP Program Requirements

- Compliance with Federal [Civil Rights and Nondiscrimination](#) law.
- Provision of [meaningful access](#) to individuals with limited English proficiency.
- Compliance with Federal [Equal Employment Opportunity](#) laws.
- Adherence to the [Department of Justice Financial Guide](#).
- Adherence to the DCJS grant guidelines for which funding was awarded.
 - [SFY 2024 guidelines](#)
 - [CY 2023 guidelines](#)

Unallowable Activities

- Procedures or policies that exclude victims from receiving assistance based on their actual or perceived age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, or the age and/or gender of their children.
- Procedures or policies that compromise the confidentiality of information and privacy of persons receiving services.
- Policies that deny individuals access to services based on their relationship to the perpetrator.
- Materials that are not tailored to the dynamics of sexual assault or the culturally specific population to be served.
- Policies or engaging in practices that impose restrictive conditions to be met by the victim in order to receive services (e.g., mandatory counseling, seeking an order for protection).
- Policies that require the victim to report the sexual assault to law enforcement.

Unallowable Costs

- Activities focused on prevention efforts and public education
- Providing training to allied professionals and the community
- Domestic violence services unrelated to sexual violence
- Sexual Assault Response Team coordination
- Lobbying
- Fundraising
- Sexual Assault Forensic Medical Examiner programs
- Criminal justice-related projects, including law enforcement, prosecution, courts, and forensic interviews
- Purchase of real property
- Construction
- Physical modifications to buildings, including minor renovations
- Research projects

Allowability FAQ #1

- May SASP funds be used to support projects that include education and prevention activities?
- No, SASP Formula Program funds may not be used for education and prevention, including education to allied professionals.
- However, funds may be used for outreach to inform persons about the services provided by a specific program. For example, a program could use pamphlets, brochures, or community presentations to announce the services available under the grant.

Allowability FAQ #2

- May SASP funds be used to support projects implemented by child advocacy centers?
- Generally, SASP funds cannot support child advocacy centers based on these reasons:
 - To be eligible for SASP funding, a programs must assist individuals who have been victimized by sexual assault, **without regard to the age of the individual.**
 - SASP funds may not be used for prosecution or law enforcement projects such as forensic examinations or forensic interviewing, which are often components of child advocacy centers.

Allowability FAQ #3

- May SASP funds be used for a subgrant that just focuses on a particular age? For example, may a subgrant be used to hire a children's advocate or a youth advocate?
- The subgrantee organization itself must provide services to sexual assault victims of all ages. The specific subgrant, however, may focus on a particular age group, such as children, youth, or elders.

Allowability FAQ #4

- May SASP funds be used for volunteer-related expenses?
- Yes, SASP funds may be used to support volunteer-related activities, so long as those volunteers provide direct services for victims. Examples would include training volunteers to provide crisis intervention and supervision of those volunteers.

Allowability FAQ #5

- May SASP funds be used for trainings on sexual assault for other professionals (e.g., for law enforcement officers, mental health professionals, prosecutors, etc.)?
- No, SASP funds must be used for direct services. They may not be used for general training, nor may they be used to develop training curricula.

Allowability FAQ #6

- May SASP funds be used to address domestic violence?
- No. Funds must be used to provide services to victims of sexual assault.
- In cases when victims of domestic violence disclose a history of sexual assault, including by a current or former intimate partner, services may be provided with SASP funding **to the extent that such victim expresses a need for services related to the sexual assault.**
- For example, SASP funds could support accompaniment of victims to sexual assault forensic medical exams but could not be used to support a general domestic violence-related crisis shelter.

Allowability FAQ #7

- May SASP funds be used for women’s only or men’s only support groups?
- A recipient may provide women’s only and men’s only support groups, but only if it is necessary to the essential operation of the program that these support groups be segregated by sex.
- Even if a recipient can establish that sex-specific support groups are necessary to the essential operation of the program, the recipient is still required to provide “comparable services” to victims who cannot be served by the sex-specific support groups.
- For more information about a recipient’s option to provide services in a sex-segregated or sex-specific manner and its obligation to provide comparable services, please see the FAQs on the Nondiscrimination Grant Condition in the Violence Against Women Reauthorization Act of 2013 at <http://www.ovw.usdoj.gov/docs/faqs-ngc-vawa.pdf>.

Grant Conditions

- Conditions for all DCJS grants found here: [Grant Requirements | Virginia Department of Criminal Justice Services](#).
- Some SASP grant conditions to note:
 1. Requirement to report actual or imminent breach of personally identifiable information
 2. Determinations of suitability to interact with participating minors
 3. Reporting potential fraud, waste, and abuse, and similar misconduct
 4. Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence
 5. Project Initiation
 6. Publication Disclaimer
 7. Civil Rights
 8. Contract Amendments

Grant Condition: Requirement to report actual or imminent breach of personally identifiable information

- The subgrantee must have written procedures in place to respond in the event of an actual or imminent “breach” of victims’ personally identifiable information (PII) that is within the scope of an OVW grant-funded program or activity.
- The subgrantee’s breach procedures must include a requirement to report actual or imminent breach of PII to DCJS no later than 24 hours after an occurrence of an actual breach, or the detection of an imminent breach.
- PII means information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

- *Personally Identifiable Information (PII)* means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, public websites, and university listings. This type of information is considered to be Public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.

Source: [eCFR :: 2 CFR 200.1 -- Definitions.](#)

Grant Condition: Determinations of suitability to interact with participating minors

- The subrecipient may not permit any covered individual to interact with any participating minor in the course of activities under the award, unless the recipient or subrecipient first has made a written determination of the suitability of that individual to interact with participating minors.

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

Grant Condition:

Reporting potential fraud, waste, and abuse, and similar misconduct

- Subrecipient must promptly refer to the DOJ Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, subgrantee, contractor, subcontractor, or other person has, in connection with funds under this award – (1) submitted a claim that violates the False Claims Act; or (2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.
- Potential fraud, waste, abuse, or misconduct involving or relating to funds under this award should be reported to the OIG by:
 - Online submission accessible via the OIG webpage at <https://oig.justice.gov/hotline/contact-grants.htm> (select “Submit Report Online”);
 - Mail directed to U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or
 - By facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax).
- Additional information is available from the DOJ OIG website at <https://oig.justice.gov/hotline>

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

- Subrecipient must have a policy or issue a policy within 270 days of the award date, to address workplace-related incidents of sexual misconduct, domestic violence, and dating violence involving an employee, volunteer, consultant, or contractor.

[FY 2020 Workplace Sexual Misconduct Special Condition \(justice.gov\)](#)

Grant Condition: Project initiation

- Within 60 days of the starting date of the grant, the subgrantee must initiate the project funded. If not, the subgrantee 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 subgrantee must obtain approval in writing from DCJS for a new implementation date or DCJS may cancel and terminate the project and redistribute the funds.

Grant Condition: Publication disclaimer

- All materials and publications (written, web-based, audio-visual, or any other format) resulting from subaward activities shall contain the following statement:

“This project was supported by Subgrant No. _____ awarded by the Virginia Department of Criminal Justice Services for the Office on Violence Against Women, U.S. Department of Justice’s SAS Formula Grant Program. The opinions, findings, conclusions, and recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the state or the U.S. Department of Justice.”

Grant Condition: Civil Rights

- Grantees may not discriminate in employment or in the delivery of services or benefits, based on actual or perceived race, color, national origin, sex, religion, disability, sexual orientation, and gender identity.
- Grantees are required to have procedures in place for responding to complaints of discrimination and retaliation within their agency.
- Grantees must notify employees and clients, customers, and program participants about prohibited discrimination and the procedures for filing a complaint of discrimination.

Grant Condition

Civil Rights–LEP

- Grantees must take reasonable steps to provide persons of Limited English Proficiency (LEP) meaningful access to services.
- All organizations that provide direct services are required to have LEP policies.
- Further information on the responsibilities to provide language services to LEP individuals can be found at <https://www.lep.gov/>.

Grant Condition: Civil Rights Required Training

- The grantee must meet the civil rights training requirements through viewing the [online training modules](#) offered through the Office on Civil Rights. The grantee must review these training modules at least once per grant cycle.
 - They include the civil rights overview, standard assurances modules, and the module on the obligations to provide services to limited English proficient (LEP) individuals.
 - All authorized officials must take this training.
 - Grant funded staff must also take the training.

Grant Condition: Contract Amendments

- Contract amendments must be submitted for approval in the On-line Grants Management System (OGMS). These contract amendments include, but are not limited to, the following:
 - Budget Amendment – Revision
 - Budget Amendment – In Line Adjustment
 - Change Grant Funded Staff – within 30 days
 - Change in Authorized Official – within 30 days
 - Project Scope of Work Revision
 - Reporting Extension

Grant Condition: Contract Amendments, General Information

- Budgets cannot be changed without the prior approval of DCJS.
- No more than two (2) budget amendments will be permitted during the grant period.
- Unlimited in-line budget adjustments.
- Budget amendment and adjustment requests are to be submitted using OGMS.
- The submission deadline for budget amendments is 45 days prior to the end of the grant period.
- In-line budget adjustments may be made up to the end of the award period.
- Changes in grant funded staff and authorized officials must be made in a contract amendment within 30 days of the change occurring.
- [Budget Amendment Desk Tool](#)

Project Scope of Work Revision

- Changes to the goals or objectives of the grant.
- Changes to the service area or elimination of a service.
- Transfer of the performance of substantive programmatic work to a third party through a sub-award.

In-Line Budget Adjustments

- Allow grantees to move money within one budget category.
- There is no limit on the number of in-line adjustments per award period.
- All costs must be described, itemized, and justified in accordance with the grant guidelines.
- Items must be allowable, allocable to the project, reasonable, and necessary to the goals and objectives of the grant.
- Grantees can utilize the attachment component to provide supplemental narratives or quotes to substantiate the request.

Budget Amendments

- Budget amendments allow the grantee to make changes **between** budget categories (ex., moving personnel funds to supplies).
- No more than two permitted per year.
- Submission deadline is 45 days prior to the end of the grant period.
- The budget amendment request must make it clear:
 - Where the funds are being moved from, and why
 - Where the funds are being moved to, for what purpose
- All costs must be described, itemized, and justified in accordance with the grant guidelines.
- Items must be allowable, allocable to the project, reasonable, and necessary to the goals and objectives of the grant.
- Grantees can utilize the attachment component to provide supplemental narratives or quotes to substantiate the request.

Salary Increase Requests

- Justification must include:
 - the rationale used to determine the level of compensation requested.
 - assurance that the requested amount is consistent with the agency or local unit of government's compensation plan.
 - The requested compensation level should be further documented by comparison of the scope and complexity of work performed to other similar positions receiving similar pay.
- A letter from the organization's human resource staff responsible for compensation plan administration is required and must be attached to the request. It should endorse the requested salary increase and include assurance that requested expenses are not covered by any other funding source.

Justifying

- DCJS must ensure that funds are used to support the purpose of SASP funding.
- Why do you need this item you are asking for?
- How does having this item support you in serving sexual assault victims?
- Is this item allowable? Tie it to the Guidelines.
- Is it cost effective? Are there less expensive ways to meet the need? Why not go with the less expensive way?

Basis of Computation

- DCJS must determine whether requests are reasonable.
- Consider including quotes or invoices to demonstrate whether the cost is reasonable.
- How did you determine the amount of funding you are asking for? What is that amount based on?
- Make a case; don't make us have to *Google* prices.
- Is it prorated?
- Does it need to be prorated?

Is a Request Reasonable?

- “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.” (2 CFR 200.404)

Prorating

- SASP funds cannot pay for 100% of an item that is not used exclusively for your SASP project.
- If your SASP award makes up 5% of your direct service budget, consider prorating an item used by the whole organization by 5%.
- If your SASP award pays for 50% of an FTE, you can prorate supplies for that person 50%.

Additional Budget Considerations

- Awarded funds must be used to support your project within the grant period.
- You cannot buy something in one grant period that you actually intend to use in another grant period.
- You cannot pay for a conference that actually occurs in another grant period.
- You do not need to spend all your grant money. Whatever is not spent will be used by DCJS in future awards.

General Rules for Successful Financial Grant Management, extracted from the DOJ Grants Financial Guide

- Personnel Documentation
 - Timesheets must clearly identify the amount of salary charged to each funding source by number of actual hours worked under the grant project for each funding source.
 - Grant funds may only be reimbursed for actual hours worked on this grant project.
 - Timesheets should be signed by the staff person and the supervisor.
- Supply and Equipment Expense Documentation: For an approved expense to be reimbursed, it should be coded appropriately in your accounting ledger and have required back-up documentation.
- Travel Expense Documentation: Travel documentation includes lodging receipts, meals, map outlining the distance traveled for mileage, and other receipts as needed.
- Have supporting documentation available. It does not need to be turned in with your claim request unless specifically asked for by DCJS.
- The financial accounting system must track the receipt, obligation, and expenditure of all grant funds by funding source (i.e., federal, state, match).

General Rules for Successful Financial Grant Management, extracted from the DOJ Grants Financial Guide

- Track grant funded equipment via ledger and by placing a sticker on the item that has the grant number from which the funds were used.
 - You cannot give grant funded equipment to victims because you cannot track it. Think computers, cell phones, cars, security equipment, etc.
- Expense documentation: If the documentation does not exist, the expense doesn't either.
- Comingling funds: Do not combine funds from different sources into one account.
- Confidentiality: Redact or omit personally identifying victim information from all documents sent to DCJS.
- Procurement Policies: Follow your agency's procurement policy and document rationale for your method (i.e., sole source vs. competitive).

General Rules for Successful Financial Grant Management, extracted from the DOJ Grants Financial Guide

- Duplication of Funding
 - If you have other active federal awards during the period of performance for this award, promptly determine whether funds from any of those other federal awards have been, are being, or are to be used (in whole or in part) for one or more of the identical cost items for which funds are provided under this award.
 - If so, promptly notify DCJS in writing of the potential duplication.
 - If requested by DCJS, submit a budget-modification and/or change-of-project-scope to eliminate duplication of funding.

Disbursement of Funds

- Disbursement of funds will occur, quarterly, on a cost reimbursement basis for actual funds expended.
- Grantees will only be reimbursed for costs that have been incurred within the grant period.
- Costs must be within the approved grant budget or approved budget amendment.
- Requests for reimbursement (claims) must be submitted through OGMS with the appropriate [certification form](#).
- Funds cannot be reimbursed if the SAM registration is expired. Please be sure to check your SAM registration status throughout the award period.

Financial Reporting

DCJS requires online submission of quarterly financial reports into the On-line Grants Management System (OGMS)

Due Dates Calendar Grants*

- 1st Quarter: April 15
- 2nd Quarter: July 15
- 3rd Quarter: October 15
- 4th Quarter: January 15

Due Dates State Fiscal Year Grants*

- 1st Quarter: October 15
- 2nd Quarter: January 15
- 3rd Quarter: April 15
- 4th Quarter: July 15

*If any of the above dates fall on a holiday or weekend, the report is due the next business day.

Status Reporting

- For Calendar Year grants, one status report for the 12-month period due by January 15.
- For the SFY 2024 Special Funding Opportunity, two (2) six-month status reports are due January 15, 2024, and July 15, 2024.
- If the due date falls on a weekend or holiday, the report is due the next business day.
- Grant recipients must use this [SASP Progress Report Form](#), which must be uploaded to OGMS upon completion.
- SASP Report Help
 - DCJS Reporting Webinar <https://youtu.be/8ly2dE87reE>
 - Report written [instructions](#)
- If you need a reporting extension, submit a contract amendment asking for the extension in advance of the due date.

OVW SASP Reporting Form

- Read the instructions on the webpage and follow them exactly.
- You will need [Adobe Acrobat Reader®](#).
- Only report the work done through the SASP grant for which you are submitting the report.
- Use the button at the bottom of the form to validate your data.
- Correct the form until it is validated.
- Upload the report to OGMS.
- Supporting documentation for all reported performance data must be maintained onsite and made available to DCJS upon request.

OGMS SASP Reporting Notice

- Starting this year, DCJS will prompt programs to complete their SASP reports through an OGMS notice.
- The notice will go out approximately two (2) weeks before the due date.
- When this happens, a status report will automatically be opened for you in editing status. You need to upload a PDF of the OVW report and submit.

Common OGMS Questions

- How do I give someone in my agency the ability to access a grant or grant application that they need to see?
 - Under the tab called *General Information*, select Edit, and under the *Additional Grantee Contacts* box, choose the person you wish to add. Then save the form.
 - If this person is not an option from which to choose, they are either not registered in OGMS or they are not registered as part of your agency. They will need to register or contact OGMS Support to link themselves with the correct agency.
- Is it okay to share my login information with my Board President so they can access our grant in OGMS?
 - No. All authorized officials are required to be registered in OGMS. They must use their own login.
 - Additionally, DCJS uses the OGMS correspondence feature and needs to be able to send correspondence to all authorized officials.

Further Assistance

- For assistance with OGMS, contact ogmssupport@dcjs.virginia.gov and include the name of the agency/locality, and grant number
- For detailed instructions and videos for OGMS, refer to the [OGMS Training & Resources](#) page.
- Financial/claims questions contact Joseph Thompson at joseph.thompson@dcjs.virginia.gov
- For programmatic questions regarding your SASP grant, contact your DCJS grant monitor.

For questions about the SASP
grant program, contact:

Andi Martin

andi.martin@dcjs.virginia.gov

(804) 371-0534

SASP Monthly Office Hours, 11am–12pm

August 10, 2023

September 7, 2023

October 4, 2023

November 9, 2023

December 14, 2023

January 11, 2024

February 8, 2024

March 14, 2024

April 11, 2024

May 9, 2024

June 13, 2024

***Zoom link will be provided in
OGMS correspondence.***