Victim Services Grant Program (VSGP) New Grant Orientation

July 2023



VSGP Sources of Funding

- 1. Federal Victims of Crime Act (VOCA)*
- 2. State General Funds (for some VSGP subgrantees)
 - The VSGP funding opportunity is based on the purpose, conditions and limitations that are part of VOCA funds and the U.S. Department of Justice Financial Guide
 - Note the Catalog of Federal Domestic Assistance (CFDA) number is 16.575. An email from DeAndrea Williams was sent on June 30, 2023, about this SOGA correction.

VOCA Funds

- Administered at the federal level by the U.S. Department of Justice's Office for Victims of Crime (OVC).
- The primary purpose of VOCA funding is to support the delivery of direct services to victims of crime. For the purposes of this grant program, a crime victim is defined as a person who has suffered physical, sexual, financial, and/or emotional harm as a result of the commission of a crime. This includes victims of federal crimes. Crimes do not need to be reported to law enforcement in order for people to receive services under VOCA.

VSGP

- Runs on a state fiscal year (SFY) which is July 1–June 30
- SFY 2024 VSGP is a 12-month grant
- Match is usually required for VOCA funded awards but due to the pandemic, for this award, it is not required. It should not be incorporated into the budget nor reported.

VSGP Program Requirements

- Compliance with Federal <u>Civil Rights and Nondiscrimination</u> law.
- Provision of <u>meaningful access</u> to individuals with limited English proficiency.
- Compliance with Federal <u>Equal Opportunity</u> laws.
- Adherence to the <u>Department of Justice Financial Guide</u>.
- Adherence to the Virginia Department of Criminal Justice Services (DCJS) grant guidelines for which funding was awarded: <u>VSGP SFY 2024 Grant Guidelines</u>.

VSGP Program Requirements (Cont.)

- Provide services directly to victims of crime.
- Promote within the community being served a coordination of public and private efforts to serve and aid crime victims. Your MOUs and the way you work with other service providers matters.
- Assist victims of crime in seeking crime victim compensation benefits.
- Utilize volunteers significantly in project activities.
- This list is not all inclusive. Review the <u>DCJS VOCA Readiness</u> <u>Assessment</u>.

Allowable Costs and Activities

- Focused on direct services for victims of crime.
- Costs must be:
 - Allowable under the <u>VOCA rule</u>.
 - Reasonable
 - According to the Code of Federal Regulations, "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."
 - Necessary to carry out the goals of your project.
 - Allocable to your grant. The funding must connect to activities happening in your VSGP project.

Partial List of Unallowable Costs

- Lobbying
- Prevention Activities
- Research and Studies
- Active Investigation and the Prosecution of Criminal Activities
- Fundraising
- Capital Expenses/Construction
- Compensation for Victims of Crime
- Most Medical Care
- Most Salaries and Expenses of Management
- Allowable under VOCA but unallowable under VSGP SFY 24 Guidelines
 - Travel for out of state conferences
 - Automobiles and Automobile Leases

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Grant Conditions

- Conditions for all DCJS grants found here: <u>Grant Requirements |</u> <u>Virginia Department of Criminal Justice Services</u>
- Some 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. Civil Rights
 - 5. Contract Amendments

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

- Written procedures must be in place to respond in the event of an actual or imminent breach of personally identifiable information (PII).
- 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.

 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 grantee may not permit any covered individual to interact with any participating minor in the course of activities under the award, unless the grantee first has made a written determination of the suitability of that individual to interact with participating minors.
- DOJ requirement for VOCA and VAWA grants.
- The details of this requirement are posted on the OJP web site at: <u>https://ojp.gov/funding/Explore/Interact-Minors.htm</u>.

Grant Condition: Reporting potential fraud, waste, and abuse, and similar misconduct

- Grantee 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 <u>https://oig.justice.gov/hotline/contactgrants.htm</u> (select "Submit Report Online");
 - 2. 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
 - 3. 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 <u>https://oig.justice.gov/hotline</u>.

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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.

https://www.ojp.gov/program/civil-rights-office/equalemployment-opportunity-plans

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 policies to ensure meaningful access.
- Further information on the responsibilities to provide language services to LEP individuals can be found at <u>https://www.lep.gov/</u>.

Grant Condition: Civil Rights Required Training

- The grantee must meet the civil rights training requirements through viewing the <u>online training modules</u> 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

- Budgets cannot be changed without the prior approval of DCJS.
- Budget amendment and adjustment requests are to be submitted using OGMS.
- <u>Budget Amendment Desk Tool</u>

Grant Condition: Contract Amendments 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, contract, or any other means.
- Changing the type of funded organization.

In-Line Budget Adjustments

- Allow grantees to move money within one budget category.
- In-line adjustments can be reviewed anytime during the year but must be approved by your grant monitor prior to the end of the fiscal year and prior to funds being expended. Note: grant monitors may need up to two (2) weeks to review and approve budget amendments and adjustments.
- 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 (2) 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 VSGP funding and the goals and objectives of each grant.
- Why do you need this item you are asking for?
- How does having this item support you in meeting the goals of your VSGP grant?
- 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? Show your math.
- Make a case; don't make us have to *Google* prices.
- Is it prorated?
- Does it need to be prorated?

Prorating

- VSGP funds cannot pay for 100% of an item that is not used exclusively for your VSGP project.
- If your VSGP award makes up 45% of your direct service budget, consider prorating an item used by the whole organization by 45%.
- If your VSGP award pays for 50% of an FTE, you can prorate supplies for that person 50%.
- Data should be prorated, too.
 <u>Victim Assistance Prorating Strategy for Subgrantees (ojp.gov)</u>

Other 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.
 - Remember: Federal VOCA dollars are one source and State General Funds are a second source.
 - The number of actual hours worked should mirror the requested budget amount.
 - 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).

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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 ledger and 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-ofproject-scope to eliminate duplication of funding.

Disbursement of Funds

- Disbursement of funds will occur, quarterly, on a cost reimbursement basis for actual funds expended and reported in quarterly reports.
- 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 <u>certification form</u>.
- Funds cannot be reimbursed if the SAM registration is expired.
 Please be sure to check your SAM registration status throughout the award period.

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Financial Reporting

- DCJS requires online submission of quarterly financial reports into the On-line Grants Management System (OGMS).
- Due Dates for SFY 2024 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

- VSGP has THREE status report forms:
 - OGMS quarterly status reporting form
 - VSGP Goals and Objectives Report
 - Performance Measurement Tool (PMT) quarterly report uploaded into OGMS as an attachment
- Due Dates for SFY 2024 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.

Purpose of Status Reporting

- Monitor Project Progress.
- Opportunity to report project changes and challenges meeting goals and objectives.

OGMS VSGP Reporting Notice

- Starting this year, DCJS will prompt programs to complete their VSGP quarterly reports through an OGMS notice.
- The notice will go out approximately two weeks before the due date.
- When this happens, a status report will automatically be opened for you in editing status.

OGMS Quarterly Status Report Form

- Brief Project Description
- Number of requests for service that were unmet due to organizational capacity issues
- Number of client surveys distributed
- Number of client surveys completed
- Challenges meeting your goals over the reporting period
- Case study demonstrating services provided with VSGP funds
- Emerging issues or notable trends
- The number of victims of federal crimes served
- Project Income earned during the reporting period (new)
 - How was the income earned?
 - How much was made?
 - How was this amount applied to your VSGP project?

VSGP Goals and Objectives Form

- Goals and Objectives were developed during the application phase of your grant.
- Goals and Objectives must be measurable.
- Report on progress and/or barriers toward each objective.
- On the final report, report whether you met the objectives.

Performance Measurement Tool (PMT)

- OVC's PMT system is an online reporting system located here: <u>OJP PMP Login</u>.
- If you do not have a login for this system and you are your agency representative reporting in PMT, please contact Anya Shaffer at <u>anya.shaffer@dcjs.virginia.gov</u>.
- Data is reported quarterly in PMT, then saved as a PDF and attached to the OGMS status report.

Performance Measurement Tool (PMT)

- Report only on services and activities that are funded through your VSGP grant (including state funds and volunteer provided services).
- Include services and activities of volunteers and/or student interns that support the grant-funded project.
- Save frequently!
- There's a more detailed walkthrough on the DCJS website: <u>https://www.dcjs.virginia.gov/victims-services/grants/voca</u>

Entering PMT Quarterly Data

- Review Tab Your data entry isn't complete unless you do this step!
- Check the box to "mark data entry as complete" and click "save".

RMATION		
	Mark data entry as complete. The record will be locked for further data entry.	SAVE
	Additional Comments	
	You have 500 characters lett. (Maximum characters: 500) *Once data entry is complete for a reporting period, you can view performance data reports here.	

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Status Report Documentation

 Supporting documentation for all reported performance data must be maintained onsite and made available to DCJS upon request.

VSGP Encumbrance

- Subgrant Award Report (SAR) Worksheet
 - A SAR is required by OVC at the start of each award period. You complete the worksheet and DCJS will enter the SAR in the OVC PMT system.
 - Encumbrance due date is July 28, 2023.
 - The SAR Excel worksheet link <u>https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/sarworksheet2</u> <u>024.xlsx</u>
 - The worksheet can also be found on the DCJS VSGP webpage and within your encumbrance in OGMS.
 - Complete the Worksheet and upload it to your grant under the SAR Attachment grant component.
- As you are doing this worksheet
 - Ensure your SOGA matches your budget, including the federal and state funded split. If it does not match, contact your grant monitor right away.

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 that 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 information.
 - 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 <u>ogmssupport@dcjs.virginia.gov</u> 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 VSGP grant, contact your DCJS grant monitor.

For questions about **your grant**, contact <u>your grant monitor</u>.

For questions about the VSGP grant program, contact:

Andi Martin andi.martin@dcjs.virginia.gov (804) 371-0534

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