Starting the Grant Year with Success

A Guide for Effective, Efficient Grants Management

DCJS Victims Services Section



Key Points for Success:

- ✓ Register in the On-line Grant Management System (OGMS)
- ✓ Read the Award Conditions Carefully and Demonstrate Compliance
- ✓ Develop a Grants Management Plan and a Filing System for Grant Documentation
- ✓ Maintain Communication with DCJS and within the Organization
- ✓ Maintain Financial Accountability, Time & Effort Compliance

- ✓ Maintain Timely Submission of Status Reports and Claims
- ✓ Monitor Spending and Grant Performance Frequently
- ✓ Submit Budget Modifications (if necessary) in Advance of the Deadline
- ✓ Submit Grant Staff/Official Changes to DCJS within 30 days of the Change
- ✓ Prepare for Sub-recipient Monitoring

Register in the On-line Grant Management System (OGMS):

- All authorized officials (project director, project administrator, finance officer) and persons responsible for grants management must be registered in OGMS. If someone other than the project administrator has signatory authority, provide a letter from the project administrator designating signing authority to the identified staff.
- To register, go to the <u>OGMS</u> homepage, select the registration option, and follow the on-screen prompts. To ensure that all users are associated with the appropriate grant(s), please make sure to list the correct organization.
- Registrants can select one grant program area but that does not restrict access to apply for funding from other sources. Registration approval can take 3-5 business days.
- We advise all sub-recipients to plan accordingly and register promptly to ensure access and timely submission of grant requirements. The primary contact on the application can add/delete other grant contacts on the OGMS General Information form. This allows folks to simultaneously work on applications and post-award tasks.
- To support adequate internal controls, sharing credentials is not allowed. We
 advise sub-recipients to ensure that procedures and roles are documented in the
 organization's written financial and grants management protocol.
- All changes to grant funded staff and/or officials must be submitted in the OGMS Contract Amendments component. For assistance with registration or other system features, visit the OGMS Training and Resources <u>Page</u> or contact ogmssupport@dcjs.virginia.gov.

Read the Award Conditions Carefully The award package contains the official award document (Statement of Grant Award-SOGA) and links to the Award Conditions and <u>Requirements</u>. The award package is sent through OGMS in the Correspondence component to all authorized officials.

Once the award package has been issued, thoroughly review the details, ensuring that all contact information and allocations are consistent with your records. If there are any discrepancies in the name(s) of authorized officials or amounts listed, please contact your DCJS grant monitor for guidance.

Upon award, go to the OGMS Encumbrances component to see if there are any holds or actions that require your immediate attention. Respond to all requests in a timely manner. Contact your DCJS Grant monitor for technical assistance if needed.

Demonstrate Compliance with Conditions



It is imperative that all sub-recipients demonstrate compliance with applicable Award conditions and <u>requirements</u>. The Award conditions provide grant program specific guidance on required policies that must be implemented to maintain compliance.

-0	U

Evidence of compliance with the Award conditions must be available upon request. To view the Award conditions, visit the DCJS Grant Requirements <u>page</u>, and select the appropriate calendar or fiscal year grant program as listed on your SOGA.



Ensure that all authorized officials and persons responsible for grants management, receive a copy of the award notice and conditions and have an understanding of the requirements, and of the grant goals and objectives per funding stream. For questions, contact your DCJS grant monitor.

Submit the Award Document in a Timely Manner

- The signed award document must be sent to grantsmgmt@dcjs.virginia.gov within 60 days of the award notice. Once received by DCJS, the award status in OGMS will change to Underway. This status allows sub-recipients to have full access to managing all grant components to include claims, status reports, contract amendments, etc.
- If the signed award document has not been received within 60 days of the award notice, an encumbrance (hold) will be placed on the award preventing disbursement of funds.
- For projects that have not submitted a signed award document within 90 days of the award notice, an official letter notifying DCJS of the delay of implementation must be submitted. Refer to the Award conditions for specific instructions. For questions regarding your award status, contact your DCJS grant monitor.

Develop a Grants Management Plan

- Refer to the Award conditions for reporting deadlines and other important information to ensure that activities are carried out as stipulated in the approved application. Incorporate Award requirements and deadlines into your organization's written financial and grants management protocol.
- Deadlines can also be posted to a shared internal calendar allowing everyone to see when reports and other requirements are due. Identify roles for all persons responsible for grants management. Hold routine grant performance/compliance reviews where requirements are discussed, progress toward goals and objectives are noted, and concerns are addressed.
- Conduct routine budget reviews to monitor spending and performance to ensure that the award is implemented as planned and that all expenditures and activities are carried out by the end of the award period. Review grant components in OGMS to ensure that the information is accurate and aligns with your organization's financial accounting.
- If necessary, submit a request for a budget modification through the OGMS Contract Amendments component. While the deadline for budget amendments is no later than 45 days, before the end of the award period, sub-recipients must submit requests earlier than the stated deadline. Submitting requests in the final quarter of the grant period can potentially be indicative of poor budget planning and impact the desired changes the organization hopes to implement.
- Be responsive to all DCJS requests to ensure that all items are addressed in a timely manner.
- Maintain a list of important grant contacts. Report any questions or concerns regarding your project to your DCJS grant <u>monitor</u>.

Develop a Filing System for Grant Documentation

- Copies of all grant documentation must be made available to DCJS upon request to include: approved grant applications, signed award agreements, encumbrances (if applicable), claims and status reports, contract amendments (if applicable), inventory of major supplies and/or equipment, timesheets, policies referenced in the Award conditions, and all correspondence related to the grant must be kept in a file labeled with the grant number.
- Records pertinent to the award must be retained for a period of 3 years (unless otherwise specified) from the date of submission of the final expenditure report. Electronic files will suffice.
- All expenditures must be well-documented and supported by adequate and appropriate source documentation (i.e. itemized vendor receipts, purchase orders, invoices). All grant funded activities must be supported with documentation to substantiate reported performance (i.e. VAdata reports)
- For more information on documents that must be made available to DCJS, refer to the Victims Services Grants Management Resource <u>page</u> to view the Items for Review Checklist and Monitoring Tool.

Maintain Communication with the DCJS Grant Monitor:

- All grant related inquiries must be submitted via OGMS Correspondence. Responsiveness to requests from the awarding agency is paramount to ensuring compliance with all grant requirements. Please ensure that all actionable Award conditions and encumbrances requiring a response, are adhered to within the specified deadline.
- If you are unable to meet a deadline, contact your grant monitor in advance. Staying connected and keeping your DCJS grant monitor abreast of all changes that impact the award is critical to your success and compliance.
- Changes in grant funded staff and/or authorized officials (project director, project administrator, finance officer) must be submitted within 30 days of the change via the Contract Amendments component. Visit the OGMS Training & Resources <u>page</u> for general instructions on how to submit a contract amendment.
- The grant monitor is the best resource to send all inquiries related to award performance and compliance. They are readily available to answer all questions or provide you with direction needed. For a list of Victims Services Monitoring Regions, go to the Victims Services Grant Management Resources <u>page</u>.

Maintain Internal Communication:

- All authorized officials (project director, project administrator, finance officer) have the following established roles and responsibilities: to oversee day-to-day program operations; to ensure that the terms and conditions of the award are fulfilled; and to ensure proper fiscal management of the awarded funds respectively.
- We encourage all authorized officials and other persons responsible for grants management, to have written protocols and to communicate internally, on a frequent basis.
- Ensure that all parties are kept abreast of grant requirements, changes, and that roles are clearly delineated in a written financial and grants management protocol.
- Ensure that grant funded staff understand the goals and objectives per funding stream(s) and that staff are discussing whether the project is on target/budget.
- Utilize OGMS Correspondence to communicate updates, questions, or concerns to the DCJS grant monitor.
- Develop a list of internal contacts and DCJS contacts to communicate updates, changes, and technical assistance needs.

Maintain Financial Compliance and Supporting Documentation

- Effective grants management and compliance relies on having a robust system of internal controls which includes written financial and grants management protocols. Internal controls can minimize risk, protect assets, promote stewardship, and encourage consistent adherence to the organization's policies and procedures.
- All sub-recipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. The accounting system must be able to record and report on the receipt, obligation, and expenditure of grant funds by source (ex. federal, state, special, match).
- Sub-recipients must properly track the use of award funds and maintain adequate supporting documentation including proper documentation for all paid grant and match staff and volunteer time reported as well as an inventory of major supplies or equipment. Further information is available in the DOJ Grants Financial <u>Guide</u>.
- All expenses must be allowable, allocable, reasonable, necessary and in accordance with the applicable grant program guidelines and other applicable regulations. Modifications to the budget must be submitted in the OGMS Contract Amendments component and approved by the DCJS grant monitor prior to obligating and expending funds.
- Note: Vehicles, trinkets or giveaways are not allowable purchases. Further, accepting gifts for personal use from purchases made with grant funds is not allowed. For client assistance funds, ensure that proper internal controls are in place for proper authorization and confidentially track funds that are used to address emergency victim assistance. For detailed instructions on contract amendments, visit the Victims Services Grants Management <u>page</u>.

Maintain Time & Effort Tracking Compliance Charges made to federally funded awards for salaries, wages, and fringe benefits must be based on records that accurately reflect the work performed and comply with the established policies and practices of the organization. See 2 C.F.R. § 200.430 and § 200.431.

Payroll records should reflect after the fact distribution of actual activities or certifications of actual work performed by grant funded staff.

All records must clearly state the grant program and funding source(s) utilized to support grant funded time and be easily identified by cost center or code that references the funding source.

For more information, please see the Office on Victims of Crime (OVC) Time and Effort Tracking Guide <u>Sheet</u>. For sample documents, visit the Victims Services Grants Management Resources <u>page</u>.

Timely Submission of Claims (Financial Reports & Reimbursements):

- Prior to issuing payments, all sub-recipients must have an active registration in the System for Award Management (SAM). To check the status of your organization's SAM registration go to: www.sam.gov.
- All sub-recipients must submit claims on a quarterly basis (unless otherwise specified). Claims for federal grants must be accompanied by the Claim Certification <u>form</u>. Claims must be submitted on the 15th day following the close of the quarter. If the 15th falls on a weekend or holiday, the claim is due on the following business day.
- All backup documentation for reported expenditures and matching funds (if applicable) must be maintained onsite and made available upon request. For instructions on how to submit claims, go to the OGMS Training & Resources <u>page</u>.
- Claims are reviewed and approved by Grants Management. Funds will not be disbursed without an approved status report. For questions on submitted claims, contact the assigned DCJS grant monitor.

Timely Submission of Status Reports (Programmatic Activities):

- All sub-recipients must submit reports by the specified date in the Award conditions. Most grant programs require status reports by the 15th day following the close of the quarter. If the 15th falls on a weekend or holiday, the report is due on the following business day.
- All reports must be submitted via OGMS and include all reporting requirements and attachments for grant funded activities only. Make sure to remove personally identifiable information (PII). Prior to disbursement of funds, status reports must be in approved status. Supporting documentation to validate reported performance data must be maintained onsite and made available upon request.
- Throughout the award period, review performance to ensure that the approved goals and objectives are on track and discuss issues or concerns with your DCJS grant monitor. Report challenges or barriers to meeting goals and objectives, in the status report. Prior to submission, make sure the report is accurate and complete. Enlist an internal reviewer if needed.
- For grant program specific reporting requirements, refer to the Award conditions and/or go the Victims Services Grants <u>page</u>. For instructions on how to submit a status report, click <u>here</u>. For questions or concerns regarding performance, contact your DCJS grant monitor.

Monitor Spending & Grant Performance:

- Conduct routine spending and performance reviews to ensure that spending is consistent with the approved budget and reported activities. Routine checks on fiscal and programmatic activity should be performed throughout the award period. If the project is not on track financially or programmatically, communicate within your organization and implement solutions to address any identified barriers.
- Report challenges as well as solutions in your status reports. In addition, conduct routine checks of the OGMS Grant Components to see if there are any pending forms that require attention or if there are any inconsistencies between the system and your internal financial accounting.
- If a budget modification is needed, submit a request via the Contract Amendment component in OGMS. Budget modifications can be submitted throughout the award period. The deadline for budget amendments is 45 days prior to end of the award period.
- The deadline for in-line adjustments is no more than two weeks before the end of the award period. In an effort to avoid approval delays, which could cause interruptions in purchasing the requested items, submit the request as early as possible.
- Requests moving a significant portion of funds, in the last quarter, is a potential indicator of a change in scope or in some cases a potential award risk and will be documented as a compliance issue unless there are other reasons explaining the delay in budget planning. All modifications must be approved prior to obligating/expending funds.
- For instructions on how to submit a contract amendment, please visit the OGMS Training & Resources <u>page</u>. For questions about budget modifications, contact your DCJS grant monitor for technical assistance.

Submit Budget Modifications with Sufficient Lead Time:

- As stated in the Award conditions, no change to the approved budget may be made without the prior approval of DCJS. Post-award budget modifications include budget amendments or in-line budget adjustments and must be submitted via OGMS Contract Amendments.
- A budget amendment consists of moving funds between budget categories (ex. personnel to travel). An in-line budget adjustment moves funds within the budget category (ex. salary to fringe). Whether the change is between or within the budget category, all changes must be approved by DCJS prior to obligating and/or expending funds.
- It is imperative that sub-recipients frequently monitor spending and grant performance, throughout the award period, update DCJS of any changes or technical assistance needs as appropriate and submit requests in advance of the deadline. Avoid waiting until the deadline to submit your request.
- The budget amendment deadline is no later than 45 days before the end of the award period. No more than two budget amendments will be permitted during the award period. There is no limit on the amount of in-line budget adjustments and requests can be submitted up to two weeks before the end of the award period.
- Sub-recipients must ensure that there is ample time for a comprehensive review and approval by DCJS. Email correspondence from DCJS regarding a budget modification does not suffice as documentation of approval. Late requests will not be accepted.
- All requested items must be allowable, allocable, reasonable and necessary. Requests must be adequately described, include a basis of computation, and itemization. The use of terms "misc., etc., including but not limited to" are not sufficient descriptions. Make sure the request contains appropriate justification explaining how the item is directly linked to project goals. Attachments or other supporting documentation can be uploaded to the request to substantiate a cost.
- Visit the Victims Services Grants Management Resource <u>page</u> for detailed instructions on contract amendments and refer to the accompanying Budget Amendment Desk Tool.

Budget Modification Review & Approval

Budget amendments have two levels of approval by the DCJS grant monitor and supervisor. The review process can take a minimum of two weeks. Upon approval, DCJS Grants Management updates the main budget grid in OGMS. Then, the applicable budget forms are negotiated (unlocked) by the monitor for the sub-recipient to revise and resubmit to DCJS.

Once the amendment has been approved, the sub-recipient can obligate/expends funds. In some cases, the approval process can take longer if revisions are needed and not resubmitted to DCJS in a timely manner. We advise sub-recipients to plan accordingly and submit requests in advance.

Allow ample time for a comprehensive review of your request and make sure to respond to all OGMS alerts if additional information is requested. If a budget form is marked as pending that indicates that it can be revised by the sub-recipient to align with the approved request. Do not add additional items that have not been approved.

Refer to the grant guidelines to ensure that the request is allowed. The guidelines also provide instructions for describing, itemizing, and justifying costs. To access the grant program guidelines, go to the Victims Services Grants page.

Submit Changes in Grant Funded Staff/Officials in a Timely Manner:

- Changes in grant funded staff and authorized officials (project director, project administrator, finance officer) must be submitted in the OGMS contract amendment component within 30 days of the change occurring.
- Changes must be submitted as a separate contract amendment request and not embedded in a status report, budget amendment or in-line budget adjustment.
- For general instructions on how to submit a contract amendment, visit the OGMS Training and Resources <u>page</u>.
- Note: Changes in authorized officials require signature by the project administrator, or designee, on the VS Changes in Authorized Officials Form. For technical assistance, contact your DCJS grant monitor.

Prepare for Sub-recipient Monitoring:

The U.S. Department of Justice (Office of Justice Programs) requires DCJS to regularly monitor the use of its federal grant funds awarded to sub-recipient agencies to ensure compliance with federal regulations.

In accordance with the DCJS Grant Monitoring Policies and Procedures, DCJS ensures that sub-recipients are in compliance with all grant conditions and that technical assistance is provided as needed to implement effective programs.

As the state administering agency, DCJS is required to develop a risk-based monitoring plan, conduct fiscal and programmatic monitoring on all sub-recipients, and conduct enhanced monitoring of sub-grantees determined to be high risk.

Sub-recipient Monitoring (cont.)

- A pre-award risk assessment is conducted to review timeliness of financial and programmatic reporting, adherence to financial audit requirements (if applicable), progress toward established goals and objectives and if activity is consistent with reported spending, changes in grant funded staff or authorized officials, the date of the last site visit and any other documented compliance concerns.
- The results of the risk assessment indicate the risk level (high, moderate, low) and determines the frequency of monitoring. High risk requires an annual site visit, moderate requires visits every other year, and low risk requires visits every four years. DCJS can conduct visits on an alternative schedule should other compliance issues arise.
- Effective grant compliance relies on having the proper policies and procedures in place and a robust system of internal controls and mechanisms to prevent fraud, waste, and abuse. The monitoring process allows programs to demonstrate compliance, share achievements, receive technical assistance, and identify policies or procedures that need to be implemented or revised to ensure that all requirements are satisfied and promote stewardship of the awarded funds.
- If your program is scheduled for a site visit, you will receive a monitoring notice from your assigned DCJS grant monitor. For more information on risk-based monitoring, please visit our website to view the DCJS Monitoring <u>Policy</u>.



Questions

- For questions regarding your grant award, contact your assigned DCJS Grant <u>Monitor</u> via OGMS Correspondence.
- Grant Management Resources | Virginia Department of Criminal Justice Services
- <u>OGMS Training & Resources | Virginia</u> <u>Department of Criminal Justice Services</u>
- For technical support with OGMS, contact <u>ogmssuport@dcjs.virginia.gov</u>.

