



OFFICE OF POLICY AND MANAGEMENT

Criminal Justice Policy and Planning Division

450 Capitol Avenue-MS# 52CJP

Hartford, CT 06106-1308

STOP VIOLENCE AGAINST WOMEN GRANT PROGRAM

**Sub Grantee Grant Administration
Manual**

Calendar Year 2015 Edition

Do Not Use Previous Editions

| OPM CONTACT |
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| If you need any assistance with these general conditions please contact: |
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Notice to Applicants and Grant Recipients: There is no commitment on the part of the State Office of Policy and Management (OPM) to provide continuation and/or supplemental funding. Initial project funding does not obligate OPM to continue financial support for a project beyond the expiration date of an approved grant award.

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1. Matching Requirement

Federal funds may be used to pay up to 75% of the total cost of a program. The remaining non-federal share shall be provided to grant recipients by OPM in the form of state appropriated match.

All budgets and quarterly financials should reflect the 75% Federal and 25% State split.

2. Period of Award

Initial project funding does not obligate OPM to continue its support of the project beyond the grant period listed on the Grant Award.

Funds must be obligated within the grant period and obligations must be liquidated within 45 days. For additional guidance please refer to General Condition Item # 5.

3. Application Due Date

The grant applications are due at the Office of Policy and Management-CJPPD by a date determined by OPM. **Early submissions are encouraged.** For technical assistance contact Kristina Gonzalez, at (860) 418-6291.

4. Extensions

The recipient must request a formal extension and receive approval from OPM.

- Sub Grantee must submit the **CJPPD Grant Amendment form** to request a grant period extension no later than **60 days prior** to the existing grant end-date.
- OPM will require a **revised budget** and **narrative** that reflects the grant period extension.
- OPM must approve the revised budget and narrative before actual implementation.
- A sub grantee shall not expend or obligate funds for goods, services, products, personnel or any other direct or indirect costs that were not included in the OPM-approved budget.

5. Expenditure Deadline

ALL GRANT FUNDS MUST BE OBLIGATED BY THE END OF THE PERIOD OF THE GRANT AWARD AND EXPENDED WITHIN **FORTY-FIVE DAYS** OF THE GRANT PERIOD "END DATE".

- The "End Date" is the date the grant period ends. The "End Date" is clearly stated on the official OPM Grant Award document.
- Personnel straight-time must be worked prior to the grant period end date.
- Purchase orders and contracts must be signed and funds committed prior to the grant period end date.
- Contractual services, goods, and work products must be delivered within **45 days** of the grant period end date.
- All commitments and obligations must be liquidated within **45 days** of the grant period end date.
- Programs concluding before the end date are expected to submit final reports as soon as available, or in accordance with the reporting schedule.
- Funds not obligated by the grant end date or expended within the **45-day** de-obligation period must be returned to OPM within **45 days** of the grant period end date.

6. Unallowable Expenses

- Grant funds may not be used for renovation or remodeling of physical structures, construction projects, or acquisition of land.
- Grant funds may not be used for food and beverage.
- Grant funds may not be used for out-of-state travel unless approved by OPM prior to travel.
- Grant funds may not be used for vehicles, luxury items, social events, trinkets, and giveaways such as cups and key chains.
- Grant funds may not be used for prevention services including primary prevention education, school-based education and awareness unless prior approval from OPM.

7. Government Performance and Results Act (GPRA)

Under the Government Performance and Results Act (GPRA) and VAWA 2000, sub grantees are required to collect and maintain data that measure the effectiveness of their grant-funded activities. Accordingly, the grantee agrees to submit an annual electronic progress report on program activities and program effectiveness measures. Information that grantees must collect under GPRA and VAWA 2000 includes, but is not limited to:

1. Number of victims receiving required services.
2. Number of persons seeking services who could not be served.
3. Number and percentage of arrests relative to the number of police responses to domestic violence incidents.
4. Number of sexual assault nurse examiners trained.
5. Number of victim advocates supported by grant funding.

When applicable sub grantees shall collect demographic data of the population that was served through the grant funds.

8. General Reporting Requirements

Sub Grantees are required to submit Quarterly Financial reports, Quarterly Progress Reports and other reports in accordance with a reporting schedule and the conditions of the grant award. Additional reports may be necessary to meet requirements imposed by the federal agency (USDOJ) or OPM. In general, mandatory reports are as follows:

OPM Quarterly Requirements

- **Quarterly Progress Report** due within 15 days of the end of each quarter
- **Quarterly Financial Report** due within 15 days of the end of each quarter
- **Personnel Time, Activity Reports, Invoices, Training Agenda and Material** due within 15 days of the end of each quarter

Federal Annual Requirements

- **OVW Federal Annual Data Report** due within **45 days** of the end of the calendar year.
- In certain circumstance OPM may allow the Federal Annual Report to serve as a quarterly.

Final Progress Report and **Final Financial Report**, Signed by Sub Grantee's authorized official, are due at sub grant closeout.

INCOMPLETE OR DELINQUENT REPORTS WILL IMPEDE THE FLOW OF GRANT FUNDS. OPM RESERVES THE RIGHT TO WITHHOLD PAYMENTS UNTIL COMPLETE AND TIMELY REPORTS ARE RECEIVED.

9. Contract/Sub-contract Compliance

Connecticut General Statutes, §§ 4a-60(a) (1) and 4a-60a (a)(1), was adopted to ensure that State agencies do not enter into grants/contracts with organizations or businesses that discriminate against protected class persons. To carry out the provisions of the statute, the Commission on Human Rights and Opportunities developed compliance regulations, which impose certain obligations on state agencies, contractors and grantees.

OPM must consider the following factors in its selection of grantees/contractors:

- * The bidder's success in implementing an affirmative action plan;
- * If the bidder does not have a written affirmative action plan, the bidder's promise to develop one;
- * The bidder's submission of employment information or EEO-1 or EEO-4 data indicating that the composition of its work force is at or near parity when compared to the racial and sexual composition of the work force in the relevant labor market area; and
- * The bidder's promise to set aside a portion of the contract for legitimate minority business enterprises.

If you indicate that you will be sub-contracting or sub-granting a portion of this grant, you must also complete the OPM Sub-Contractor Packet.

The OPM Contractor/Grantee Packet must be completed, signed and returned to OPM.

10. Procurement Policies and Procedures

Non-Profit Organization that are grant recipients must establish written procurement policies and procedures that follow the procurement standards contained in the Administrative rules referenced in:

Uniform Administrative Requirement for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-profit Organizations, codified at Title 28 CFR Section 70.44(a)(1), 7/1/2010 edition, known as the "NP Common Rule".

State agency or local governments that are grant recipients must follow the standards contained in:

Uniform Administrative Requirements for Grants and Cooperative Agreements with State and Local Units of Government, codified at Title 28 CFR Section 66.36 known as the "Common Rule"

Non-Profit organizations and local governments must submit a copy (electronic or hard copy) of their written Procurement Policies and Procedures. For assistance and guidance on developing policies, please refer to:

USDOJ Guide to Procurement Procedures

http://www.ojp.gov/financialguide/PDFs/New%20Procurement%20Guide_508compliant.pdf

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11. Sole Source

Sub-recipient must seek OPM Approval to "sole-source" contracted funds of \$25,000 or more to an outside party.

12. Consultant Rates

Costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill are allowable with OPM prior approval.

Consultant rates shall not exceed **\$650 per day**.

An 8-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance. Please note, however, that this does not mean that the rate can or should be \$650 for all consultants.

Trainers and Technical Assistant Providers are considered Consultants. Please Reference General Condition # 24.

13. Inventory Control Policies and Procedures

Federal law requires that all equipment purchased with the USDOJ grant funds is used for criminal justice purpose. Grant recipients are responsible for replacing or repairing property which is willfully or negligently lost, stolen, damaged, or destroyed.

Local governments **must have an official written inventory control policy and procedure consistent with** Governmental Accounting Standards Board (GASB) and 42 United States Code §3789. Please refer to the USDOJ Financial guide for detail and guidance.

<http://www.justice.gov/ovw/grantees>

Non-profit organizations **must have an official written inventory control policy and procedure consistent with AICPA Audit and Accounting Guide and** 42 United States Code §3789. Please refer to the USDOJ Financial guide for detail and guidance.

<http://www.justice.gov/ovw/grantees>

Non-Profit organizations and local governments must submit a copy (electronic or hard copy) of their Inventory Control Policies and Procedures.

14. Debarment

All applicants must complete a "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion, Lower Tier Covered Transactions" which documents the applicant's good standing with the federal government.

15. Lobbying

Federal law prohibits recipients of federal contracts, grants, and loans from using federally appropriated funds for lobbying the Executive or Legislative Branches of the Federal or State Government in connection with a specific contract, grant or loan. Grant recipients are also prohibited from using federal grant funds to lobby for enactment, modification or repeal of State or Federal legislation.

16. Cash Flow

To initiate the flow of cash, grant recipients must return the signed **Notice of Grant Award**.

Grant Payments will be released on a **quarterly basis** as reimbursement of expenditures that are incurred for the prior quarter.

The sub grantee may request an “advance draw” for an upcoming major expense in a subsequent quarter subject to OPM Approval. Written request with explanation must be submitted.

Personnel expenditures cannot be processed as an “Advance Draw”.

Cash requests shall be submitted by the Financial Officer through the Grantium Electronic Portal.

All Cash Requests must be submitted with two decimal places. The Grantium system will not accept Rounding.

OPM RESERVES THE RIGHT TO WITHHOLD PROCESSING GRANTEE CASH REQUESTS UNTIL ALL REPORTING OBLIGATIONS HAVE BEEN MET.

17. Non- Supplanting

Since the Grantee is receiving Federal funds in this grant as identified in the Notice of Grant Award, the Grantee agrees that these grant funds will be used to supplement and increase, but not Supplant, the level of state, local, and private and federal funds that would, otherwise be made available for this project and to serve this target population and will in no event replace such state, local, private and federal funds.

18. Amendments to the Budget and Scope of Services

“**Amendments**” involve substantial administrative work for grant recipients as well as OPM. Therefore, efforts should be made to minimize the need for budget and scope of services amendments.

Any amendments to an existing grant award require a submitted **CJPPD Grant Amendment form**, revised **Project Narrative**, and revised **Budget Detail Worksheet**.

The completed **CJPPD Grant Amendment Form** must be received prior to **60 days** of the **proposed amendment start date**.

Scope of Service(s) Revisions: Sub Grantees must request approval from OPM to amend the scope of services which includes but is not limited to;

- Revisions to the Objectives
- Updates to Timelines
- Changes to Deliverables and Work Products.
- Changes with Sub-Contractor Services

Budget Revisions: Sub Grantees must request approval from OPM to amend the budget which includes but is not limited to;

- Funds are moved between budget categories (Personnel, Travel/Mileage, Equipment, and Consulting, Supplies, Facilities and Other).
- Funds are moved to a new budget line item that was not included in the original budget.
- Funds are moved to a new category that was not included in the original budget.

OPM must approve the CJPPD Grant Amendment form, revised budget, and narrative before actual implementation of the revision or modification.

A grantee shall not expend or obligate funds for goods, services, products, personnel or any other direct or indirect costs that were not included in the OPM-approved budget.

19. Application Review and Award Process

Upon receipt of an application, OPM staff will review the document for compliance with program and administrative requirements. OPM may schedule pre-award meetings to discuss applications and discuss Amendments if necessary.

If the application is incomplete, OPM will inform the applicant of the application status and deficiencies requiring attention and improvement. After correction, the application will be considered complete and officially received.

If deemed complete, award documents will be sent to the organization’s signatory. At the same time, copies of the grant award, general grant conditions, and all required report forms will be sent to the “Project Director” and “Financial Officer” listed on the application Sub Grantee Cover Sheet.

20. OPM Correspondence and Communication

During the grant period and throughout the close-out process, OPM will correspond with the grant recipient's representative(s) identified in the Sub Grant Cover Sheet as the "**Project Director**" and "**Financial Officer**".

In general, most of the OPM's correspondence regarding budget issues, service delivery issues, reporting reminders, cash draw down, extensions, data collection and other administrative issues shall be sent directly to the Project Director and the Financial Officer.

The grant recipients' Project Director and Financial Officer are responsible for informing the recipient organization's signatory official, chief executive officer and/or governing body of the status of the grant project.

21. Records Retention

All services performed by sub grantee shall be subject to the inspection and approval of OPM at all times, and the sub grantee shall furnish all information concerning the services.

For Federal funds a grantee shall retain and maintain all accurate records and documents for **three years** after completing activities pertaining to work performed under the grant funds or *if any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.*

Retention is required for purposes of Federal examination and audit. Records may be retained in an automated format.

22. Personnel

Personnel Expenses may include the costs to implement the grant funded activities as well as costs to administer the grant.

Administrative Personnel

Administrative personnel includes the costs to prepare progress and financial reports, collect data, maintain expenditure records, maintain timesheets, contracts and other grant records, and respond to OPM Requests.

Grant Administrative personnel costs may not exceed 10% of the grant award.

Grant Funded Personnel

This would include positions that are directly involved in the delivery and services under the grant award. The following needs to be maintained for these positions.

- Time and Activity records
- The Budget Detail Worksheet must reflect the specific number of hours allocated to the grant work.
- If an individual is funded by federal grant funds all activities within their respective federal grant reimbursement hours must pertain to the grant work. No other outside projects or activities should occur and be expensed. Especially if a position is entirely funded by the grant funds.

Where salaries apply to the execution of two or more grant programs, cost activities, project periods, and/or overlapping periods, proration of costs to each activity must be made based on time and/or effort for each individual grant.

23. Accounting Standards

All recipients are required to establish and maintain accounting systems and financial records to accurately account for funds awarded to them. These records shall include both Federal funds and all State matching funds, when applicable.

Funds specifically budgeted and/or received for one project may not be used to support another project without prior written approval from OPM.

Where a sub grantee's accounting system cannot comply with this requirement, the sub grantee shall establish a system to provide adequate fund accountability for each project it has been awarded.

These accounting standards assist with ensuring that all financial reports and expenditures are correct for State and Federal Audit purposes.

24. Travel

Travel costs are the expenses for transportation, lodging, subsistence and related items incurred by sub grantee employees who are traveling to conferences or trainings with grant funds.

The following pertains to any travel that will be supported by grant funds;

- Travel must be pre-approved by OPM.
- All travel receipts, mileage reports, and invoices must be maintained as proof for reimbursement.
- Staff attending training events may be required to present a summary of the training to OPM staff and/or other sub grantees.

Requests to travel to conferences or training events must include the following;

- Names of Staff attending the event
- Purpose of the conference or training
- Justification or need for the training
- Location of training
- Dates and Costs associated with the travel and training

State of Connecticut Agencies

Please reference your agencies travel policy for additional instructions or restrictions.

State of Connecticut agencies fall under the State Travel Policy. The per diem rate information is Available at the DAS web site <http://das.ct.gov>.

Local and Non-profit Agencies

Please reference your agencies travel policy for additional instructions or restrictions.

Local and Non-Profit Agencies fall under the Federal Travel Policy. The per diem rate information is Available at the GSA web site <http://www.gsa.gov>.

25. Grant Closeout Requirements

The Sub Grantee will have **45 days** from the sub grants “End Date” to submit all closeout documents to OPM for review. OPM will review all documents and may ask for amendments as needed. All documents will be reviewed for accuracy and held for audit purposes.

Closeout Requirements

- **Final Progress Report Signed by Grantee’s authorized official** due at sub grant close-out.
- **Final Financial Report Signed by Grantee’s authorized official** due at sub grant closeout.
- **Personnel Time, Activity Reports, Invoices, Training Agenda and Material** due at closeout.
- **Property Inventory Report** due at sub grant close-out.
- **Program Income Report** due at sub grant close-out.

All Final Closeout Documents require signature from Sub Grantee’s Authorized Official.

Once Closeout is completed a **Notice of Closeout** will be sent to the sub grantee’s Financial Officer. This should be retained as proof of closeout. Please review General Condition 20 for the Records Retention requirement.

The **Property Inventory Report** is required if program budgets contain equipment purchases.

The **Program Income Report** is required if income is **generated during the grant period as a direct result of grant funding**. "Direct result," means a specific act or set of activities that are directly attributable to grant funds and which are directly related to the goals and objectives of the project. Where a specific act or set of activities is only partially funded with VAW funds, the program income may be apportioned. Examples of program income are: sale of real or personal property; royalties; attorney's fees and costs; registration/tuition fees. VAW grants are 75% federal and 25% state funds. Only 75% of program income should be reported on the Program Income Report.

Program income will be retained by the grantee, and may be used for any purpose that furthers the objectives of the original grant award. During the grant award period, program income and expenditure should be reported on the Program Income Report (PIR) form on a quarterly basis along with the Financial Report. Once the grant is closed, further quarterly PIR's are not required. OPM should be notified, either by letter or a final PIR, when program income, which had been reported to OPM but not expended by the date the grant was closed, is fully expended. Even after a grant is closed, grantees remain obligated to use program income for a purpose that furthers an objective of the original grant award, and therefore its final disposition should be noted in the OPM grant file.

Please note that these requirements apply only to program income accruing during the grant award period. Income developing from grant activities after the grant is closed is not program income for these purposes and need not be reported, or expended in furtherance of grant objectives.

26. OVW Training Guiding Principles for Sub grantees

All Trainings must be obligated by the grant end date and completed and paid for before the end of the 45 day liquidation period.

Sub Grantees must submit the following documents to receive approval for the use of a Trainer or Technical Assistance Provider.

- Training Proposal (Training Dates, Location, Cost, Outline)
- Training Agenda
- Trainer's Credentials (Bio or Resume)

Sub Grantees must submit the following supporting training documentation after the completion of the training, if applicable.

- List of Attendees
- Training Agenda
- Training Brochures or Materials
- Power Point Presentation

OVW Training Guiding Principles for Sub grantees

Any training or training materials developed or delivered with grant funding provided by the OVW is to adhere to the following guiding principles:

1. Trainings must comply with applicable law.

In developing and conducting grant-funded training, any sub grantees shall not violate the Constitution or any federal law, including any law prohibiting discrimination.

2. The content of trainings and training materials must be accurate, appropriately tailored, and focused.

The content of training programs must be accurate, useful to those being trained, and well matched to the program's stated objectives. Training materials used or distributed at trainings must be accurate, relevant, and consistent with these guiding principles.

3. Trainers must be well-qualified in the subject area and skilled in presenting it.

Trainers must possess the subject-matter knowledge and the subject-specific training experience necessary to meet the objectives of the training. In selecting or retaining a trainer, sub grantees should consider such factors as the trainer's resume and written materials, interviews with the trainer, observation of other trainings conducted by the trainer, feedback from other entities with which the trainer has worked, training participant feedback and evaluations, and the general reputation of the trainer.

4. Trainers must demonstrate the highest standards of professionalism.

Trainers must comport themselves with professionalism. While trainings will necessarily entail varying teaching styles, techniques, and degrees of formality, as appropriate to the particular training goal, professionalism demands that trainers instruct in the manner that best communicates the subject matter while conveying respect for all.