

Grants for Outreach and Services to Underserved Populations

**FY 2018 Orientation
December 11-13, 2018**

Population specific outreach and services to victims of domestic violence, dating violence, sexual assault, and stalking in underserved populations

- ▶ Work with government agencies and organizations to develop or enhance population specific services.
- ▶ Strengthen the capacity of underserved populations and traditional victim service providers to provide population specific services.
- ▶ Train criminal and civil justice professionals on domestic violence, dating violence, sexual assault, or stalking in underserved populations.
- ▶ Outreach, education, prevention, and intervention for victims of domestic/dating violence, sexual assault, or stalking

Parameters

- ▶ Domestic violence, dating violence, sexual assault, stalking (except culturally specific grantees – SA only)
- ▶ Aged 11 years or older
- ▶ “population specific services” = victim-centered services that address the safety, health, economic, legal, housing, workplace, immigration, confidentiality, or other needs of victims of domestic violence, dating violence, sexual assault, or stalking, and that are designed primarily for and are targeted to the underserved population

Your Grant

- ▶ Grant Award Package
- ▶ Special Conditions
- ▶ Project Documents
 - ▶ Project Narrative
 - ▶ Budget
 - ▶ Memorandum of Understanding



Have you read
your Special
Conditions.....?

Uniform Requirements & DOJ Grants Financial Guide (#2)

- Compliance with 2 C.F.R. Part 200 Uniform Requirements
- Compliance with DOJ Grants Financial Guide
 - Latest version dated December 2017
- Uniform Code webinars
- OVW GFMD webinar
- DOJ Online Financial Management Training
- DOJ Audit Webinars

Uniform Guidance on Administrative Requirements Webinars -

OVW offers a webinar-based training that covers background, effective dates, notable changes, cost principles, and audit requirements.

<https://youtu.be/m0kwPaQBq64> &
<https://youtu.be/uw4-s-Fl64Q>

OVW Grants and Financial Management Division Training –

This webinar is intended to help OVW grantees manage their OVW awards in accordance with the Grants Financial Management Guide and other applicable rules and regulations. <https://youtu.be/WKj8inI7DI0>

Grants Financial Management Online Training - offers a 24 module training emphasizing the basics of Federal grants management and is designed for those responsible for the financial administration and can help avoid questioned or unallowable costs. <http://gfm.webfirst.com/>

Report potentially duplicative funding (#3)

- Current or future federal grant awards
- Determine duplicate costs
 - Staff, Consultant, Rent, Equipment, etc.
 - Victim services, delivering or receiving training, etc.
- Immediately notify OVW in writing
- May require changes to eliminate duplication

OVW Training Guiding Principles (#8)

- Any training or training materials developed or delivered with funds under this award must adhere to the OVW Training Guiding Principles for Grantees and Subgrantees, available at:
<https://www.justice.gov/ovw/docs/ovw-training-guiding-principles-grantees-subgrantees.pdf>
- Applies to subrecipient/subgrantee

Compliance with DOJ regulations pertaining to civil rights and nondiscrimination (#11-13)

- 28 C.F.R. Part 42 - equal employment opportunity program
- 28 C.F.R. Part 38 - rules that prohibit specific forms of discrimination on the basis of religion
- 28 C.F.R. Part 54 - nondiscrimination on the basis of sex in certain education programs
- For technical assistance on complying with the civil rights laws linked to your OVW grant, please contact the:
 - Office of Justice Programs, Office for Civil Rights: <https://ojp.gov/about/offices/ocr.htm>

VAWA 2013 nondiscrimination condition (#23)

- 34 U.S.C. § 12291(b)(13) - prohibits OVW grantees from excluding, denying benefits to, or discriminating against any person, in any program/activity funded in whole or in part by OVW, on the basis of actual or perceived:
 - Race
 - Color
 - Religion
 - National origin
 - Sex
 - Gender identity
 - Sexual orientation; or
 - Disability
- April 2014, [FAQ - Nondiscrimination Grant Condition in the Violence Against Women Reauthorization Act of 2013](#) (PDF)

Fraud, Waste, and Abuse, and Similar Misconduct (#16)

- Misuse of award funds may result in suspension of funds, debarment, recoupment, civil and/or criminal penalties
- Promptly refer to DOJ OIG any credible evidence that employee or other has:
 - Submitted a false claim for grant funds; or
 - Violated laws pertaining to fraud, conflict of interest, bribery, gratuity, or other misconduct involving grant funds
- Office of the Inspector General/DOJ
oig.hotline@usdoj.gov / Hotline: (800) 869-4499
<https://oig.justice.gov/hotline>

Compliance with solicitation requirements (#22)

- Must be in compliance with requirements outlined in the FY 2018 solicitation
- The program solicitation is incorporated by reference into the award
- [FY 2018 Underserved Solicitation](#) (PDF)
- [FY 2018 Solicitation Companion Guide](#) (PDF)

Limitation on use of funds to approved activities (#25)

- ▶ Grant funds used only for the purposes described in the recipient's approved application.
 - ▶ Must not undertake any work or activities that are not described in the grant application, and
 - ▶ Must get prior written approval via Grant Adjustment Notice (GAN), from OVW, to use grant funds to pay for staff, equipment, or other goods or services for such work or activities

Non-Supplantation (#26)

- Grant funds must be used to supplement, not supplant, non-federal funds that would otherwise be available for the activities under this grant
- Grant funds must be used to supplement existing State or local funds for program activities, and **may not replace** State or local funds that have been appropriated or allocated for the same purpose. Additionally, federal funding may not replace State or local funding that is required by law.

Confidentiality and information sharing (#27)

- Must comply with the provisions of 34 U.S.C. § 12291 (b) (2), nondisclosure of confidential or private information, which includes creating and maintaining documentation of compliance, such as policies and procedures for release of victim information.
- Applies to subrecipients ("subgrantees")

Activities that compromise victim safety (#28)

- ▶ Excluding victims from services based on sex, age, immigration status, race, religion, sexual orientation, gender identity, mental health, physical health, criminal record, work in sex industry, age/sex of children
- ▶ Failing to protect victim confidentiality
- ▶ Mediation, couples counseling, family counseling or any manner of joint victim-offender counseling
- ▶ Forcing victims to testify, get a protection order, receive counseling, or other action with which they disagree
- ▶ Failing to conduct safety planning
- ▶ Failing to account for access needs of participants with disabilities, who have LEP or are Deaf/HH
- ▶ Other listed in the solicitation – solicitation companion guide

Maintaining contact information (#30)

- Responsible for maintaining updated contact information in the Grants Management System (GMS)
- Done through Grant Adjustment Notice (GAN)
 - Point of contact
 - Authorized representative
 - Agency information
 - Financial point of contact
- Update TA Provider (ALSO)

Reporting (#31-32)

- Progress Reports are due semi-annually
- Financial Reports are due quarterly
- Both reports are submitted online in GMS
- Only include activities/costs that took place and were paid for with grant funds
 - only include activities paid for by this grant. Do NOT include all agency activities (narrative)
 - only include actual expenditures. Do NOT charge the grant/report on budgeted amounts (financial)
- Reports must be submitted even if \$0 spent
- Delinquent reports automatically freeze funds

Programmatic Progress Reports

Reporting Period:	Due Date:
January 1- June 30	July 30
July 1- December 31	January 30

Financial Status Reports

Reporting Period:	Due Date
January 1- March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30
October 1 – December 31	January 30

Final Reports are due 90 days of the grant end date

Limited Direct Legal Representation (#43)

- ▶ *Cannot* provide legal representation in civil or criminal matters, such as family law cases (divorce, custody, visitation, and child support), housing cases, consumer law cases and others.
- ▶ *Can* provide legal representation to victims of domestic violence, dating violence, sexual assault, or stalking only in the limited context of protection order proceedings (either temporary or long term relief), or for limited immigration matters that may impact and affect the victim's ability to maintain safety (such as U visas).

Grants Management System

In GMS you can:

- ▶ Manage Contact Information
- ▶ Submit Narrative and Financial Reports
- ▶ Submit and Track all Grant Adjustment Notices
- ▶ Close out your award

GMS Home Page

<https://grants.ojp.usdoj.gov/gmsexternal/>

Instructional Video

<http://ojp.gov/gmscbt/>

Grant Adjustment Notices

- Changes to Grant
 - Budget Modifications
 - Change in Project Scope
 - Change in Project Periods
 - Change in MOU (SC #35)
- Approvals to Use Funds
 - For Technical Assistance/Training (SC #40)
 - For Deliverables/Publications (SC #36-37)
 - Consultant Rates exceeding maximum rate
- GANs must be approved before taking effect

GAN: Budget Modification

- ▶ Prior approval is needed when proposing the following changes:
 - ▶ Change in scope
 - ▶ Moving dollars to a budget category that is not approved (is currently \$0 in it)
 - ▶ The cumulative change is greater than 10% of the total award amount
- ▶ Submit a GAN Request in *GMS*:
 - ▶ Provide an explanation for the revision
 - ▶ You must attach a revised budget & budget narrative for the full award amount

GAN: Program Scope

- ▶ Prior approval is needed when proposing the following changes:
 - ▶ Change in goals/objectives
 - ▶ Alter programmatic activities
 - ▶ Affect the purpose of the project
 - ▶ Change the project site/person responsible/target population
- ▶ Submit a GAN Request in *GMS*:
 - ▶ Describe specific activity to be added/removed
 - ▶ Justify the action (explain why it's necessary)
 - ▶ State whether or not the change will require a budget modification

GAN: Change in Project Period

- ▶ Grantees may request a no-cost extension for up to 12 months:
 - ▶ Can submit 90 days prior to end date up to 30 days prior to end date
- ▶ Submit a GAN Request in *GMS*:
 - ▶ Propose new end date
 - ▶ Justification for extension
 - ▶ Balance of Unobligated Funds
 - ▶ Remaining activities
- ▶ A no-cost extension may be made only for award recipients that have no significant performance or compliance issues

GAN: Changes to the MOU

- ▶ Grantees must request approval of any changes to their approved MOU:
 - ▶ Special Condition: The recipient agrees to submit for OVW review and approval any anticipated addition of, removal of, or change in collaborating partner agencies or individuals who are signatories of the Memorandum of Understanding.
- ▶ Submit a GAN (PO Approval) Request in GMS:
 - ▶ Justify the action (explain why it's necessary)
 - ▶ State whether or not the change will require a revised project narrative and/or budget modification

GAN: Approval for Training

- ▶ Prior approval is needed to use grant funds to attend training:
 - ▶ Request at least 20 days before registration due
- ▶ All grants have a mandatory set aside in their budget for travel/training
- ▶ Submit a GAN Request in GMS:
 - ▶ Include completed Training Request form
 - ▶ Must include an agenda

GAN: Approval of Products/Pubs

- ▶ Prior approval is needed for all reports and any other written materials or products developed with grant funds
 - ▶ Submit at least 20 days prior to public release
 - ▶ Applicable to reports, training manuals, brochures, posters, Web sites, sound and video recordings, etc.
- ▶ Submit a GAN (PO Approval) Request in GMS
 - ▶ Attach product/publication to GAN
 - ▶ All materials and publications (written, visual, or sound) must include the OVW disclaimer: This project was supported by Grant No. _____ awarded by the Office on Violence Against Women, U.S. Department of Justice. 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 Department of Justice, Office on Violence Against Women.

GAN: Consultant Rates

- Approval of award does not indicate approval of consultant rate in excess of \$650/day (or \$81.23/hour)
- Submit a GAN (PO Approval) Request in GMS
- Include detailed justification for OVW approval prior to expending higher amount
- Attach documentation to support consultant rate

Grant Adjustment Notices

A Final word on GANs:

- ▶ Do not move forward with any changes until you receive approval of your GAN!
- ▶ Penalties for not waiting include the denial of the costs charged to the grant/ return of funds to OVW
- ▶ OVW will deny retroactive requests for approval

Grantee – Role/Responsibilities

- Adhere to Grant Special Conditions; Federal Financial Guidelines; Civil Rights Requirements; and federal, state and local laws.
- Work toward achieving the grant goals, objectives and activities as stated in the approved grant;
- Communicate any potential issues, changes and challenges to OVW Grant Program Specialist;
- Ensure victim safety;
- Ensure all victims are being served
- Ensure all services are confidential
- Adhere to deadlines

OVW Program Specialist

Serve as single point of contact

- ▶ Provide guidance: on the Federal requirements, OVW, Underserved Program policies you need to follow
- ▶ Refer: you to other assistance
- ▶ Monitor Compliance: ensure rules are being followed and properly documented
- ▶ Review and Approve: all changes to the grant, reports, deliverables
- ▶ Coordinate with other Departments

Alliance for Local Services Organization (ALSO)

Technical Assistance Provider for Underserved Grantees

- ▶ Provide support and guidance on effectively reaching Underserved Communities
- ▶ increase the capacity of grantees to address sexual assault
- ▶ provide and broker subject matter expertise and TA
- ▶ offer knowledge and skill-building opportunities

Webinars to review

- <https://www.ta2ta.org/recorded-webinars.html>
- Overview of Grant Fraud Investigations
- The Department of Justice Grant Auditing Process
- Civil Rights Obligations of Recipients of Federal Financial Assistance
- 28 C.F.R PT. 38 Revisions – Partnerships with Faith-Based and Other Neighborhood Organizations
- Overview of Grants Management System 2015
- Overview of Grants Financial Management Division 2015

Important Websites

▶ Office on Violence Against Women

<http://www.ovw.usdoj.gov/>

▶ OVW Grantee Resources

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

▶ Muskie School of Public Service (Underserved Program Progress Reports)

<http://muskie.usm.maine.edu/vawamei/underservedmain.htm>

▶ OVW Training/Technical Assistance Calendar and Directory

<https://ta2ta.org/>

Important Contacts

- ▶ If you have a program-related question....
 - ▶ **OVW Program Specialist – Kara Moller**
 - ▶ 202-616-3464 or Kara.Moller@usdoj.gov
- ▶ If you have a finance-related question...
 - ▶ **OVW Grants Financial Management Division**
 - ▶ 1-888-514-8556 or OVW.GFMD@usdoj.gov
- ▶ If you have a Grants Management System-related question...
 - ▶ **OVW GMS Support**
 - ▶ 1-866-655-4482 or OVW.GMSSupport@usdoj.gov
- ▶ If you have a progress report-related question...
 - ▶ **Muskie Institute**
 - ▶ 1-800-922-VAWA or yawamei@usm.maine.edu

Grant Administration Compliance Tips

- ▶ Stick to your approved goals and objectives
- ▶ Spend according to your approved budget
- ▶ Retain position descriptions and timesheets for staff
- ▶ Discuss any changes with your OVW Program Specialist before making changes
- ▶ Follow all special conditions on grant
- ▶ Submit reports on time
- ▶ ASK QUESTIONS!!! DO NOT BE SHY!!!

Know when to contact your OVW Grant Program Specialist:

- Changes to the grant
- Changes in key staff/Hiring of new staff
- Prior approvals
- Problems
- Questions

Managing Your Grant

Access the award package in *GMS*, designate a Financial Point of Contact for your award, and sign and return the award document.

Review the special conditions on the award document and determine what your organization needs to do to be in compliance with them.

Manage the project according to requirements, standards, and guidance contained in the grant terms and conditions, including the DOJ Financial Guide and award special conditions.

Submit quarterly Financial Status Reports and Semiannual Programmatic Progress Reports.

Request approval for modifications to your award as required.

Complete all deliverables as stated in your application, and required by the solicitation or in a special condition.