

United States Department of Justice  
**Office on Violence Against Women**  
*Working Together to End the Violence*

**Presentation by the  
Grants Financial Management Division**

**New Grantee Orientation:  
FY 2021 Grants for Outreach and Services to  
Underserved Populations Program**

OVW **January 2021**

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**Welcome and  
Introductions**

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**Welcome and Introductions**

**Grants Financial Management Division**

**We assist OVW program division and grantees throughout the entire grant life cycle. Including -**

- Pre-award risk assessments
- Review and approve award budgets
- TA and Training
- Grant Award Modifications – review and approval
- Conference Cost Request – review and approval
- Develop financial grants administration policy for OVW
- OIG Audit Resolution
- Closeout of awards

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**Welcome and Introductions**

**How to contact us --**

**OVW GFMD Helpdesk:**  
(888) 514-8556  
[OVW.GFMD@usdoj.gov](mailto:OVW.GFMD@usdoj.gov)

**OVW JustGrants Helpdesk:**  
(866) 655-4482  
[OVW.JustGrantsSupport@usdoj.gov](mailto:OVW.JustGrantsSupport@usdoj.gov)

**ASAP Helpdesk:**  
(855) 868-0151 (option 2, then option 3)  
[ASAPHelpdesk@fiscal.treasury.gov](mailto:ASAPHelpdesk@fiscal.treasury.gov)

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**Administrative Requirements**

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**Administrative Requirements**

**Follow all Federal Regulations:**

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements  
– 2 CFR Part 200
- DOJ Financial Guide
- Program Solicitation

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<b>OVW</b>	<p><b>Administrative Requirements</b></p> <p><b>Standards for costs:</b></p> <ul style="list-style-type: none"> <li>• Allowable</li> <li>• Reasonable</li> <li>• Necessary and allocable</li> <li>• Claimed against only one award</li> <li>• Permissible under State &amp; Federal laws and regulations</li> <li>• Treated consistently between Federal and non-Federal funds</li> <li>• Cannot shift costs to: <ul style="list-style-type: none"> <li>- Overcome funding deficiencies</li> <li>- Avoid restrictions or award terms</li> </ul> </li> </ul>
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<b>OVW</b>	<p><b>Administrative Requirements</b></p> <p><b>OIG Audit, Single Audit, and Financial Monitoring</b></p> <p><b>Reviews may include:</b></p> <ul style="list-style-type: none"> <li>• Review and assess entire operation of entity</li> <li>• Review written accounting and organizational policies and procedures</li> <li>• Compare approved budget vs. actual costs</li> <li>• Determine excess cash on hand</li> </ul>
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<b>OVW</b>	<p><b>Administrative Requirements</b></p> <p><b>Most Common Findings:</b></p> <ul style="list-style-type: none"> <li>• Lack of documentation – missing or incomplete invoices, contracts, receipts, etc.</li> <li>• Inadequate or no timesheets</li> <li>• Expenditures on FFR don't match amounts in records</li> <li>• No documented (or inadequate) policies or procedures</li> <li>• Movement of funds over 10% without budget mod GAM approval</li> <li>• Applying incorrect IDC rate to wrong period</li> </ul>
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**Administrative Requirements**

**Findings could result in:**

- Unallowable costs requiring repayment of funds to DOJ
- Placement on DOJ High Risk List
- Hold on funds
- Possible termination of award
- Negative future funding decisions
- Lead to an OIG investigation in some cases (suspicion of criminal activity)

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**Questions?**

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**Setting Up Your Award**

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OVW	<p><b>Setting Up Your Award</b></p> <p><b>Policy for steps to take when award is received:</b></p> <ul style="list-style-type: none"> <li>• Create a Grant File (hard or electronic)</li> <li>• Review Award Conditions</li> <li>• Set up (new) cost center in accounting system</li> <li>• Set up tracking of Budgeted vs. Actual Expenditures</li> <li>• Require Source Documentation</li> </ul>
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OVW	<p><b>Setting Up Your Award</b></p> <p><b>Create a grant file:</b></p> <ul style="list-style-type: none"> <li>• Copy of application</li> <li>• Signed award document</li> <li>• MOUs</li> <li>• Approved Budget</li> <li>• Correspondence</li> <li>• Financial Reports (including corresponding G/L report supporting amounts reported)</li> </ul>
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OVW	<p><b>Setting Up Your Award</b></p> <p><b>Review All Award Conditions</b></p> <ul style="list-style-type: none"> <li>• <b>Example: Conditional Clearance with Release of TA Funds</b>  <small>The recipient acknowledges that the budget for this award is pending review and approval. Until OVW approves the budget, the recipient may not obligate, expend, or draw down any funds, except those that OVW allows for participation in or travel-related expenses to attend OVW-sponsored technical assistance events. Any obligations or expenditures incurred by the recipient prior to the budget being approved are made at the recipient's own risk. If there is another condition on the award prohibiting any obligation, expenditure, and drawdown of any funds, that other condition will control. Remaining funds will not be available for drawdown until OVW's Grants Financial Management Division has approved the budget and budget narrative via a Grant Award Modification (GAM). If applicable, the Indirect Cost Rate will be identified in the GAM when the budget is approved.</small></li> </ul>
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**Setting Up Your Award**

**Track Budgeted vs. Actual Expenditures**

Once the budget has been approved by OVW, set up a system to track and compare the approved budgeted expenditures with the actual expenditures

- In your financial accounting system
- Excel chart
- Review on a regular basis (monthly)

Program and Finance staff should work closely together to monitor programmatic and financial progress of your award(s)

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**Setting Up Your Award**

**Track Budgeted vs. Actual Expenditures**

Sample Tracking -

2019 OVW Comprehensive TA Program - Project Period 10/1/2019 - 9/30/2021				
Grant and Budget Categories	Approved Budget	Actual Expenditures as of 12/31/2019	Available Balance (Deficit) of Budget	Percentage of Budget Expended
Personnel	\$325,468.00	\$38,693.57	\$286,774.43	11.9%
Fringe Benefits	\$90,557.00	\$11,002.47	\$79,554.53	12.1%
Travel	\$23,549.00	\$5,439.91	\$18,109.09	<b>23.1%</b>
Equipment	\$0.00	\$0.00	\$0.00	
Supplies	\$21,691.00	\$3,507.75	\$18,183.25	16.2%
Consultants/Contracts	\$83,950.00	\$2,350.00	\$81,600.00	<b>2.8%</b>
Other Costs	\$79,785.00	\$9,212.67	\$70,572.33	11.5%
Indirect Costs	\$0.00	\$0.00	\$0.00	
<b>Total Project Amount</b>	<b>\$625,000.00</b>	<b>\$70,206.37</b>	<b>\$554,793.63</b>	<b>11.2%</b>

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**Setting Up Your Award**

**Source Documentation**

- Timesheets, purchase orders, invoices, travel authorizations, receipts, etc.
- Not required to submit unless requested
- Must maintain on file

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OVW	<h2>Questions?</h2>
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OVW	<h2>Policies and Procedures</h2>
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OVW	<p><b>Policies and Procedures</b></p> <p>Very common audit findings: organizations have <b>incomplete, out of date</b>, and <b>inadequately enforced</b> policies and procedures.</p> <p>Can't stress enough the importance of having good policies and procedures.</p>
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<b>OVW</b>	<p><b>Policies and Procedures</b></p> <p>Topics should include –</p> <ul style="list-style-type: none"> <li>• Conflicts of Interest</li> <li>• Cost Allocation/Methodology</li> <li>• Segregation of Duties</li> <li>• Cash Management</li> <li>• Personnel and Time and Attendance</li> <li>• Travel</li> <li>• Subrecipient/Contractor Determinations</li> <li>• Procurement</li> <li>• Reporting</li> <li>• Subrecipient Management and Monitoring</li> <li>• Equipment and Inventory</li> <li>• Records Retention</li> <li>• Conference Costs</li> </ul>
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<b>OVW</b>	<p><b>Policies and Procedures</b></p> <p><b>Policies and Procedures/Accounting Manual</b></p> <p>Must be:</p> <ul style="list-style-type: none"> <li>• Complete and comprehensive</li> <li>• Documented</li> <li>• Updated regularly</li> <li>• Relative to each organization size/budget</li> </ul> <p>Important because:</p> <ul style="list-style-type: none"> <li>• Outlines all rules and methods</li> <li>• Supports strong financial management system</li> <li>• Reliable financial reports</li> </ul>
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<b>OVW</b>	<p><b>Policies and Procedures</b></p> <p>Policy should specifically identify documents are required for each process, transaction, etc.</p> <ul style="list-style-type: none"> <li>• Timesheets</li> <li>• Purchase orders</li> <li>• Invoices</li> <li>• Travel authorizations</li> <li>• Receipts</li> </ul> <p>Not required to submit documentation unless requested</p> <p>Must maintain on file (hard copy or electronic)</p>
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OVW	<p><b>Policies and Procedures</b></p> <p>Internal Controls – processes and procedures implemented by an organization to provide reasonable assurance of:</p> <ul style="list-style-type: none"> <li>• Effective and efficient operations</li> <li>• Reliable reporting</li> <li>• Safeguarding of assets</li> <li>• Compliance with laws and regulations</li> <li>• Segregation of Duties/Checks and Balances</li> </ul>
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OVW	<p><b>Policies and Procedures</b></p> <p><b>Gift Cards for Focus Groups</b></p> <ul style="list-style-type: none"> <li>• Should be generic <ul style="list-style-type: none"> <li>• Activation fee ok to charge to grant</li> </ul> </li> <li>• Documentation to support distribution <ul style="list-style-type: none"> <li>• Sign-in sheet (not for victim assistance purposes)</li> </ul> </li> <li>• Reasonable amount</li> </ul> <p><b>Policies and Procedures</b></p> <ul style="list-style-type: none"> <li>• Strong Internal Controls</li> <li>• Safe keeping</li> <li>• Physical inventory</li> <li>• Track/log distribution</li> <li>• Checks and balances</li> </ul>
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OVW	<p><b>Cash Management &amp; Federal Financial Reports (FFR) Policies and Procedures</b></p>
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**Cash Management & FFR**

- An adequate system for cash management minimizes the time between recipient of funds from Treasury and the disbursement of funds by the recipient/subrecipient
- Federal cash on hand should be kept at or near \$0
- OVW performs quarterly "excess cash" reviews to compare recipient drawdowns with reported expenditures for the same period of time

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<sup>5(1)</sup>

**Cash Management & FFR**

- Amounts reported on the FFR should be actual expenditures **not** drawdowns
- Expenditure amounts reported on the FFR should equal the amounts in your accounting system
- **Process Shift: 10e reports cumulative expenditures**
- Comparison of expenditures reported on FFRs to G/L reports is a monitoring tool used by DOJ during desk reviews and site visits

Federal Expenditures and Unexpended Balance	
d. Total Federal funds authorized	\$ 625,000.00
e. Federal share of expenditures	\$ 73,208.37
f. Federal share of liabilities/obligations	\$ 0.00
g. Total Federal statement of financial	\$ 73,208.37
h. Unexpended balance of Federal funds in statement g.	\$ 551,791.63

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**Cash Management & FFR**

- Reports are due 30 days after the end of the quarter
- Final Report due within 120 days after award end date

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

**Federal Financial Report (FFR), SF-425**

- Quarterly report
- Submitted in JustGrants
- Processed by Financial Manager

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## Slide 29

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**LS(1)** Do we want to get rid of the "Process Shift" note here since it's been this way for a year now?  
Lasky, Suheyla (OVW), 11/10/2021

OVW	<h2 style="margin: 0;">Travel Policies and Procedures</h2>
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OVW	<p><b>Travel Policies and Procedures</b></p> <p><b>Travel</b></p> <ul style="list-style-type: none"> <li>• Document and follow the travel policy</li> <li>• May refer to GSA's Federal Travel Regulations</li> <li>• Very important to keep all supporting documentation             <ul style="list-style-type: none"> <li>- Travel Authorization</li> <li>- Reimbursement Form/Expense Reports</li> <li>- Receipts(airfare, baggage, hotel, taxi, airport parking)</li> </ul> </li> <li>• <b>Copy of Credit Card Statement is NOT sufficient supporting documentation</b></li> </ul>
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OVW	<p><b>Travel Policies and Procedures</b></p> <p><b>Travel Policies and Procedures:</b></p> <ul style="list-style-type: none"> <li>• <b>Approval/authorization BEFORE travel</b> <ul style="list-style-type: none"> <li>- When does approval need to happen? Ex. Request needs to be submitted two weeks prior to travel</li> <li>- Who approves the request?</li> <li>- How is approval obtained? Routing of a form?</li> <li>- What needs to be included with the request? Copy of agenda? Breakdown of estimated costs?</li> </ul> </li> <li>• <b>Reimbursement AFTER travel</b> <ul style="list-style-type: none"> <li>- Who is the reimbursement request submitted to for review and approval?</li> <li>- What documentation must be provided?</li> <li>- When must it be submitted? Ex. Must be submitted within 2 weeks of return from trip</li> </ul> </li> </ul>
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	<p><b>Travel Policies and Procedures</b></p>  <p><b>Examples of: Travel and Air Policies</b></p>
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	<p><b>Travel Policy Sample</b></p> <p>***See Sample Document***</p> <p><b>Travel Policies:</b></p> <ul style="list-style-type: none"> <li>• Travel costs are the expenses for transportation, lodging, subsistence and related items incurred by employees who are in travel status on official business.</li> <li>• It is the policy of ORGANIZATION to reimburse individuals for the expenses of travel, including the cost of transportation, meals, and lodging, provided such travel is performed in the course of conducting ORGANIZATION business and the costs are reasonable and allowable. Alcoholic beverages will not be reimbursed.</li> <li>• The mode of travel should be based on the minimum expense in terms of employee time as well as travel costs to ORGANIZATION, although employees will not be expected to schedule excessively long routes to a destination to save money. If an individual chooses to travel by a means other than the least expensive mode, reimbursement will be made up to the amount that would have been paid had the individual traveled in the most economical manner. Receipts are still required for documentation purposes.</li> </ul>
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	<p><b>Air Travel Policy Sample</b></p> <p>***See Sample Document***</p> <p><b>Air Travel</b></p> <ul style="list-style-type: none"> <li>• Coach class accommodations should be the standard mode of air travel.</li> <li>• Tickets must be booked at least 14 days in advance of travel to take advantage of lower fares. Additional costs for making late travel arrangements are the responsibility of the employee unless pre-approved by the Executive Director.</li> <li>• Most air travel will be booked through one of two approved travel agents and direct billed to ORGANIZATION. The approving staff is responsible to ensure that travel itineraries correspond to actual travel completed.</li> <li>• For direct reimbursement, individuals must provide a copy of the airline ticket and Itinerary as documentation.</li> <li>• Once tickets have been issued to the individual, the cost of any ticket changes will be the responsibility of the individual and not ORGANIZATION. However, the Executive Director may approve the ticket change fee to be paid by ORGANIZATION non-restricted funds or federal grant funds if approved by the federal awarding agency.</li> </ul>
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OVW	<h2>Personnel and Time &amp; Attendance Policies and Procedures</h2>
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OVW	<p><b>Personnel and Time &amp; Attendance</b></p> <ul style="list-style-type: none"><li>• Time/Effort clearly documented → timesheets and activity reports</li><li>• Amounts charged match documentation</li><li>• Charge based on actuals (<u>not budgeted</u>)</li><li>• Account for total activity of employee (Federal and Non-Federal) for all funding sources</li><li>• Follow written policies and procedures</li><li>• Internal controls to assure accuracy</li></ul> <p>Contact <a href="mailto:ovw.gfmd@usdoj.gov">ovw.gfmd@usdoj.gov</a> for a sample timesheet</p>
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OVW	<h2>Personnel and Time &amp; Attendance</h2> <h3>Examples of: Recording of Time and Pay Practices</h3>
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## Recording of Time Policy Sample

\*\*\*See Sample Document\*\*\*

**Recording of Time Policy**

- Policy:**  
It is the policy of ORGANIZATION to utilize a time recording system that is as accurate as possible to record the work time of each employee.
- Purpose:**  
ORGANIZATION is committed to complying with all laws that govern employee pay. In addition, the Agency will make every effort to ensure the accuracy of its pay practices, records and systems for legal and funding purposes. This policy and procedure sets forth the steps to steps to be followed by each employee for use of the electronic timekeeping/pay system.
- Definitions**
  - Electronic time clock: The mechanism that electronically records and stores the time swipes of employees and is programmed to ORGANIZATION's timekeeping and payroll policies and practices.
  - Swipe card: The plastic card used by employees to record their work time on the electronic system.
  - Swipe: The act of running the swipe card through the electronic time keeping system to record time in and time out.
  - On-site: At a ORGANIZATION facility.
  - Off-site: Away from a ORGANIZATION facility, including Courts, home visits,

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## Pay Practices Policy Sample

\*\*\*See Sample Document\*\*\*

**Pay Practices Policy**

- Policy:**  
ORGANIZATION will pay its employees in compliance with all applicable federal and state laws and funding requirements.
- Purpose:**  
This policy explains the pay practices of ORGANIZATION.
- Definitions:**  
Workweek: From Saturday midnight to the following Saturday at 11:59 p.m.
- Procedures**
  - ORGANIZATION's pay period shall be two (2) consecutive forty (40) hour weeks. Each week shall begin and end at the times as defined under "workweek" above.
  - Paychecks are issued on a biweekly basis every other Thursday. On payday, employees will be issued a paycheck that compensates the employees for the prior, completed two (2) week period. If a payday falls on a Holiday, employees will be paid on the last working day prior to the Holiday.
  - Each paycheck will be accompanied with a statement showing gross pay, federal, state and local taxes, other deductions and net pay. In addition, the employee's current available vacation and sick time will be shown.
  - All deductions other than those required for taxes will require a signed authorization from the employee. Deduction Authorization forms are available in the Finance Department.

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## Sample Timesheet

\*\*\*See Sample Document\*\*\*

Supervisor: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Employee Name: \_\_\_\_\_

Date	Time In	Time Out	Normal Hours		Overtime	Sick	Vacation	Leave	Total	Description of Work Activities
			Start	End						
Monday	8:00	5:00							8:00	8:00-5:00
Tuesday	8:00	5:00							8:00	8:00-5:00
Wednesday	8:00	5:00							8:00	8:00-5:00
Thursday	8:00	5:00							8:00	8:00-5:00
Friday	8:00	5:00							8:00	8:00-5:00
Saturday										
Sunday										
Monday	8:00	5:00							8:00	8:00-5:00
Tuesday	8:00	5:00							8:00	8:00-5:00
Wednesday	8:00	5:00							8:00	8:00-5:00
Thursday	8:00	5:00							8:00	8:00-5:00
Friday	8:00	5:00							8:00	8:00-5:00
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Sunday										
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Tuesday	8:00	5:00							8:00	8:00-5:00
Wednesday	8:00	5:00							8:00	8:00-5:00
Thursday	8:00	5:00							8:00	8:00-5:00
Friday	8:00	5:00							8:00	8:00-5:00
Saturday										
Sunday										

**SAMPLE**

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### Sample Timesheet (continued)

\*\*\*See Sample Document\*\*\*

[Name of Organization] Timesheet 2011

Month: May 11 Name: Sample employee

Budget Pct Actual		
State VOCA Training*	8%	3%
State LSWA	30%	27%
State VOCA	10%	11%
Bural IART	3%	14%
IAVE	15%	12%
State Coalition 20	40%	27%
General Fund	0%	3%
<b>TOTAL %</b>	<b>100%</b>	<b>120%</b>

  

Task Code	Position	Pre- one	Family / Oath
Previous Balance	462.50	122.50	24.00
Used this month	0.00	0.00	0.00
Balance	462.50	122.50	24.00
Earned this month	122.50	14.00	0.00
<b>New Balance</b>	<b>622.50</b>	<b>146.50</b>	<b>24.00</b>

SAMPLE

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## Questions?

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## End of Day 1

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OVW	<h2 style="margin: 0;">Subrecipient/ Contractor Determinations</h2>
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OVW	<p><b>Subrecipient/Contractor Determinations Consultants/Contracts/Subawards</b></p> <p>Use appropriate agreement type based on the nature of the service</p> <ul style="list-style-type: none"> <li>• Subawards – carry out program activities</li> <li>• Contract – procurement for goods or services (including consultants)</li> </ul> <p>Substance of the relationship between the Federal recipient and the organization receiving the funds is more important than the form of the agreement</p> <p>Just because you issued a contract to the organization doesn't mean it's a contractual relationship</p>
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OVW	<p><b>Subrecipient/Contractor Determinations</b></p> <ul style="list-style-type: none"> <li>• What is a subrecipient? <i>Subrecipient</i> means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency. (see 2 CFR Part 200)</li> <li>• What is a contractor? <i>A contractor</i> receives a contract which is a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward (see 2 CFR Part 200).</li> </ul>
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<b>OVW</b>	<p><b>Subrecipient/Contractor Determinations</b></p> <ul style="list-style-type: none"> <li>• Recommend developing a policy and form with checklist as support for decisions</li> <li>• Why is it important to make the correct determination prior to selecting an organization to give funds to? <ul style="list-style-type: none"> <li>- To determine if procurement procedures should be followed in making the selection</li> <li>- To decide what conditions must be included on the agreement (award terms &amp; conditions or contract provisions)</li> <li>- To ensure proper negotiation of cost</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Sample checklist to determine subrecipient or contractor classification</li> </ul>

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<b>OVW</b>	<b>Subrecipient/Contractor Determinations</b>		
	<b>Characteristic</b>	<b>Subrecipient</b>	<b>Contractor</b>
	MOU partners are generally considered this	Yes	No
	Federal Program requirements and terms and conditions apply	Yes	No
	Funds received count towards meeting the audit threshold	Yes	No
	Required to be reported by direct recipient under FFATA	Yes	No
	Reimbursed for actual costs incurred	Yes	No
	Do procurement standards (including competition and sole source approval) apply?	No	Yes
Contract provisions apply (2 CFR 200 Appendix II)	No	Yes	
Profit may be earned (including fee for service)	No	Yes	

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<b>OVW</b>	<h2>Questions?</h2>
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OVW	<h2>Procurement Policies and Procedures</h2>
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OVW	<p><b>Procurement</b></p> <p>Procurement is the process used to obtain good and services from an outside vendor.</p> <ul style="list-style-type: none"> <li>• Documented procurement policy</li> <li>• Comply with CFR 200.318 – 200.327</li> <li>• <b>Check SAM.gov for vendor/consultant prior to issuing contract (Be sure to include this check in your policies – common monitoring finding)</b></li> <li>• Conflicts of interest</li> <li>• Consistent across the board (regardless of Federal/non-Federal)</li> <li>• Free and open competition</li> </ul>
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OVW	<p><b>Procurement</b></p> <p>Procurement – continued</p> <ul style="list-style-type: none"> <li>• Lease vs. Purchase Analysis</li> <li>• Maintain records detailing each procurement</li> <li>• Prior Approval for sole-source contracts (non-competitive) → \$250,000+</li> <li>• Contract should outline payment terms</li> <li>• Avoid obtaining unnecessary or duplicative items</li> </ul>
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OVW	<p><b>Procurement</b></p> <p>Consultants</p> <ul style="list-style-type: none"> <li>• Reasonable rate of compensation for consultants</li> <li>• Rate should be based on the individual consultant's experience and education and the current market conditions</li> <li>• Prior approval is required for rates in excess of \$650/day or \$81.25/hour</li> <li>• The \$650/day rate is a Prior Approval Threshold ONLY</li> </ul> <p><b>→\$650 per day is a threshold, not a standard OVW or DOJ rate</b></p>
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OVW	<p><b>Procurement</b></p> <p>Translators/Interpreters and Contracts for Accommodations</p> <ul style="list-style-type: none"> <li>• Consultant rate threshold does not apply</li> <li>• Follow procurement procedures <ul style="list-style-type: none"> <li>– Competitive bidding</li> </ul> </li> </ul>
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OVW	<p><b>Policies and Procedures for Managing and Monitoring Subawards</b></p>
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<b>OVW</b>	<p><b>Subawards/Subrecipients</b></p> <p><b>Pass-through entities are required to:</b></p> <ul style="list-style-type: none"> <li>• Clearly identify the agreement as a subaward and include all required information (outlined in 2 CFR 200.332(a))</li> <li>• Evaluate subrecipient’s potential risk for non-compliance with Federal statutes, regulations, and award requirements to determine appropriate level of subrecipient monitoring. Consider the following – <ul style="list-style-type: none"> <li>– Subrecipient’s prior history with similar subawards</li> <li>– Results of previous audits</li> <li>– Whether subrecipient has new personnel or new/substantially changed systems</li> <li>– Extent and results of Federal agency monitoring <sup>58</sup></li> </ul> </li> </ul>

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<b>OVW</b>	<p><b>Subawards/Subrecipients</b></p> <p><b>Pass-through entities are required to:</b></p> <ul style="list-style-type: none"> <li>• <b>Check SAM.gov for subrecipients prior to issuing subawards (Be sure to include this check in your policies – common monitoring finding)</b></li> <li>• Add additional special conditions as needed, based on risk assessment</li> <li>• Verify that subrecipients is audited as required by Subpart F, if required</li> <li>• Consider if results of subrecipient’s audits/reviews require you to make any adjustments to your records</li> <li>• Monitor activities, financial/performance reports, and audit compliance (as required in Subpart F)</li> <li>• When necessary, take enforcement action for non-compliance</li> </ul>

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<b>OVW</b>	<p><b>Subawards/Subrecipients</b></p> <p><b>Subrecipient Monitoring</b></p> <p>Monitor activities of the subrecipient to ensure award is used for intended/authorized purposes; compliance with statutes, regulations and terms and conditions of award; and performance goals are achieved.</p> <p>Subrecipient monitoring <b>MUST</b> include –</p> <ul style="list-style-type: none"> <li>• Reviewing financial and performance reports</li> <li>• Addressing any deficiencies identified during audits, monitoring or other means</li> <li>• Issuing management decision for audit findings</li> </ul>

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**Subawards/Subrecipients**

Subrecipient Monitoring

Depending on the results of the risk assessment, subrecipient monitoring may also include –

- Provide training and TA
- On-site monitoring
- Arrange Agreed Upon Procedures engagement

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**Questions?**

OVW

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**Grant Modifications**

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<b>OVW</b>	<p><b>Grant Modifications</b></p> <p><b>Grant Award Modifications (GAMs) are processed in JustGrants</b></p> <p><b>Types of GAMs reviewed by GFMD:</b></p> <ul style="list-style-type: none"> <li>• Budget Modifications</li> <li>• Change in grant period (grant extension)</li> </ul>
	<p><i>Formally referred to as GANs</i></p>

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<b>OVW</b>	<p><b>Grant Modifications</b></p> <p><b>Budget Modification GAMs</b></p> <p><b>Prior Approval Required for:</b></p> <ul style="list-style-type: none"> <li>• Change in scope</li> <li>• Move funds into a category not previously approved</li> <li>• Cumulative change greater than 10% of the award amount (e.g., \$300,000 → \$30,000)</li> </ul>

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<b>OVW</b>	<p><b>Budget Modification GAM Process</b></p> <ul style="list-style-type: none"> <li>•Revise Web-Based Budget <ul style="list-style-type: none"> <li>- Level of detail similar to original approved budget</li> <li>- All costs broken down and supported with narrative to justify costs</li> </ul> </li> <li>•Attach Indirect Cost Rate Agreement, if applicable <ul style="list-style-type: none"> <li>- If there are multiple rate agreements for different periods that cover the award period, attach all that apply</li> <li>- Upload rate agreement to Document Library in JustGrants</li> </ul> </li> <li>•Budget is reviewed/approved by Program Specialist first, then Financial Analyst</li> </ul>

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OVW	<h2 style="margin: 0;">Closeout/ Records Retention</h2>
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OVW	<p><b>Grant Closeout/Record Retention</b></p> <p><b>Complete the following steps:</b></p> <ul style="list-style-type: none"> <li>• Submit Final Financial Report, SF-425</li> <li>• Submit Final Progress Report</li> <li>• Ensure all award conditions satisfied (ex. indirect costs, budget approval, documentation review)</li> <li>• Complete a Financial Reconciliation</li> <li>• Submit closeout package in JustGrants within 120 days after award end date</li> </ul> <p>Keep in mind that non-compliance with closeout requirements may negatively impact future funding decisions.</p> <p><i>Previous closeout period was 90 days</i></p>
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OVW	<p><b>Grant Closeout/Record Retention</b></p> <p><b>Financial Reconciliation in JustGrants</b></p> <ul style="list-style-type: none"> <li>• Compare total reported expenditures with total funds received from OVW</li> <li>• Complete this reconciliation within the 120 day liquidation period</li> </ul> <p><b>If Expenditures Reported on Final FFR exceed Drawdowns:</b></p> <ul style="list-style-type: none"> <li>• Submit a payment request in ASAP prior to 120 days after award end date</li> <li>• Payments made after liquidation period are manual and may encounter significant delays</li> </ul> <p><b>If Drawdowns exceed Expenditures:</b></p> <ul style="list-style-type: none"> <li>• Funds must be returned in order for award to be closed</li> <li>• Contact GFMD Helpdesk for guidance on returning funds</li> </ul>
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OVW	<p><b>Grant Closeout/Record Retention</b></p> <p><b>Records must be retained for a period of three years:</b></p> <ul style="list-style-type: none"> <li>• Financial Records</li> <li>• Supporting Documentation</li> <li>• All other pertinent records</li> </ul> <p><b>Format for retention can be either hard copy or electronic</b></p> <ul style="list-style-type: none"> <li>• Records must be accessible</li> <li>• Confidential records must be secured</li> </ul> <p>See section 200.334</p>
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OVW	<h2>Resources</h2>
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OVW	<p><b>Resources</b></p> <ul style="list-style-type: none"> <li>• <b>Electronic Code of Federal Regulations</b> <a href="https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200">https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200</a></li> <li>• <b>OVW Solicitation Companion Guide</b> <a href="https://www.justice.gov/ovw/page/file/1342606/download">https://www.justice.gov/ovw/page/file/1342606/download</a></li> <li>• <b>Link to DOJ Financial Grants Management Guide</b> <a href="https://www.justice.gov/ovw/grantees">https://www.justice.gov/ovw/grantees</a></li> <li>• <b>Creating a Budget: Training for OVW Applicants</b> <a href="https://www.justice.gov/ovw/video/creating-budget">https://www.justice.gov/ovw/video/creating-budget</a></li> <li>• <b>JustGrants Training Resources</b> <a href="https://justicegrants.usdoj.gov/training-resources/justgrants-training/grants-management-lifecycle">https://justicegrants.usdoj.gov/training-resources/justgrants-training/grants-management-lifecycle</a></li> </ul>
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	<p><b>Grants Financial Management Training Online Training</b></p> <ul style="list-style-type: none"><li>• Basic grants financial management course</li><li>• Online, no limitation for registration</li><li>• Register with your vendor and award number</li><li>• One year to complete the course</li><li>• Approximately 14-16 hours to complete</li><li>• Final exam is optional</li></ul> <p><b><u><a href="https://onlinegfmt.training.ojp.gov/">https://onlinegfmt.training.ojp.gov/</a></u></b></p>
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	<p style="text-align: center;"><b>Final Questions and Answers</b></p>
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