VOCA Grant Fundamentals: Managing Your Award

Presented by:
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Objectives

I. Reporting Requirements
   a) Progress Reports
   b) Annual Performance Report
   c) SARs
   d) FFATA

II. Grant Adjustment Notices

III. Match Waiver Policy
SAAs must submit performance report data to OVC on a quarterly basis via the OVC Performance Measurement Tool (PMT).

SAAs must export the data from PMT and upload it into OJP’s Grants Management System on an annual basis.

<table>
<thead>
<tr>
<th>Reporting period</th>
<th>Type of data</th>
<th>PMT due date</th>
<th>If/when to upload to GMS?</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 1–December 31</td>
<td>Program Performance Measures</td>
<td>February 15</td>
<td>No</td>
</tr>
<tr>
<td>January 1–March 31</td>
<td>Program Performance Measures</td>
<td>May 15</td>
<td>No</td>
</tr>
<tr>
<td>April 1–June 30</td>
<td>Program Performance Measures</td>
<td>August 15</td>
<td>No</td>
</tr>
<tr>
<td>July 1–September 30</td>
<td>Program Performance Measures and Narrative</td>
<td>November 15</td>
<td>Yes (December 30)</td>
</tr>
</tbody>
</table>
Victim Assistance SAA Responsibilities

• Educate subgrantees on how to collect and report on data
• Review subgrantee data before approving it in the PMT
Common Errors – Performance Reports

- Not checking that all subgrantees have submitted reports, which generally results in your report being “in progress”;
- Not completing the narrative questions;
- Repeating the narrative responses from last year’s report;
- Not submitting a performance report for every open award in GMS;
- Not submitting the same performance report for every open award; and
- Mentioning activities unrelated to VOCA and/or including non-grant funded activities.
If you have any questions or issues regarding reporting within the PMT, please contact the PMT helpdesk. Make sure to copy your OVC grant manager.

- Hours of operation: 8:30 a.m.– 5:30 p.m., eastern time, M-F
- Email: ovcpmt@usdoj.gov
- Phone: 1–844–884–2503 (toll-free)
Discretionary Grants Reporting

• Semi-Annual Progress Reports are due as follows:
  – July 30 (for the period beginning January 1 and ending June 30)
  – January 30 (for the period beginning July 1 and ending December 31)

• Discretionary Technology Awards:
  – Following each PMT submission, the grantee must upload the PMT generated PDF within GMS in order to maintain compliance.

• FY18 VOCA Training Grant: progress report is NOT submitted in PMT.
FY18 TTA Grant Reporting – GMS Submission

• Reporting consists of:
  – Six questions that need to be answered on a separate Word document. These questions are located within GMS; and
  – Performance measures outlined in the solicitation (Appendix A).
Helpful Tips

• Make sure to only report on grant-funded activities.
• Make sure to only discuss activities that happened during the reporting period.
Grantees must create a Subaward Report (SAR) for each subaward made as part of their VOCA assistance program.

- Recipient must submit a SAR within 90 days of awarding funds to subrecipient. Recipient must submit the SAR within the OVC PMT.
- States should verify priority allocations annually in the SAR.
- If the scope of a subaward changes in a way that affects the priority and underserved area allocations, then these allocations should be updated in the OVC Performance Measurement Tool within 30 days.
Priority Areas

There are three priority categories of crime victims that SAAs must allocate a minimum of 10 percent of each year’s VOCA grant per category. In addition to the priority categories, SAAs also are required to allocate a minimum of 10 percent of each year’s VOCA grant to underserved victims of violent crime.

- Sexual Assault
- Domestic Violence
- Child Abuse
- Previously Underserved
FFATA Reporting

- **Who?** The prime awardee is required to file a FFATA subaward report through the FFATA Subaward Reporting System (FSRS).

- **What?**
  - If initial subaward is ≥$25,000, the award recipient must report the subawards and the names and annual compensation of the subawardees’ 5 highest paid executives.
  - If initial subaward is <$25,000 but subsequent modifications result in a total award ≥$25,000, the award is subject to reporting requirements of the date it reaches $25,000.
  - If the initial award is ≥$25,000 but de-obligation of the funding causes the total award amount to fall below $25,000, recipients will continue to be subject to reporting requirements.

- **Where?** [https://www.fsrs.gov](https://www.fsrs.gov)

- **When?** By the end of the month following the month in which the direct recipient awards any subgrant ≥$25,000.
The reporting requirements do **NOT** apply to the following:

- Awards to individuals
- Recipients that had a gross income of $300,000 or less in their previous tax year
- Classified Information
Grant Adjustment Notices (GANs)

• A GAN is a request to make a programmatic, administrative, or financial change to a grant.

• GANs may be submitted by the recipient, grant manager, or automatically generated by the Grants Management System (GMS).

• All GANs must be submitted electronically through the GAN module in GMS.
Types of GANs

- **Signing Authority Change**: Must be signed and on agency letterhead; submit prior to a new award to not delay the application process.

- **POC/FPOC Update**: Your grant manager is not notified if a change to an FPOC is made. Keep in mind the special condition that requires any new POC or FPOC must complete the OJP Online Financial Training within 120 days of the change or you risk funds being frozen.

- **Change in Scope**: Includes altering the project purpose, authorizing use of a subcontractor or other organization not identified in the original approved budget, or contracting for or transferring award-supported efforts (discretionary grants only).

- **Program Office Approval**:
  - Contract rates in excess of $650/day
  - Revised Time Task Plans (discretionary grants only)
  - Match Waiver Policy
Budget Modification GAN

(Discretionary Grants Only)

- Budget Modification GANs may be initiated for a budget modification if the request is to modify an approved budget to reallocate funds among budget categories.
- This type of GAN can also be used to deobligate a portion of the award amount; however, the original award amount may not be increased by this procedure.
- GANs must include an explanation of changes requested and an updated Budget Detail Worksheet with Budget Narratives included for all costs.

A budget modification GAN must be initiated if:

- The proposed cumulative change is greater than 10% of the total award amount;
- The budget modification changes the scope of the project; and
- A budget adjustment affects a cost category that was not in the original budget.
Sole Source Prior Approval GAN

• Must be submitted outside of GMS first.
• Follow the guidance regarding requirements for a sole source justification provided in Section 3.8 of the DOJ Financial Guide.
• Be advised that the Simplified Acquisition Threshold has increased from $150,000 to $250,000.
• Per Section 3.6 of the DOJ Financial Guide:
  – The DOJ grant-making component (OJP/OVC) reviews all costs requiring prior approval when the recipient is incurring the cost.
  – The direct recipient (or pass-through entity) reviews all costs requiring prior approval when the subrecipient is incurring the cost.
OVC Match Waiver Approval Process

(See Listserv message sent 6/27/2019)

• OVC will no longer require prior OVC review and approval of all match waiver determinations made by SAAs.
• SAAs may waive match without OVC prior approval, provided they:
  1. Develop and implement a match waiver policy;
  2. Submit the match waiver policy via GAN to OVC for approval. Any changes to the policy must be submitted via a new GAN within 30 days;
  3. Submit subrecipient waiver determinations to OVC via GAN no later than 30 days after approval; and
  4. Submit the match waiver spreadsheet showing all active waivers approved in a federal fiscal year no later than 90 days after fiscal year end.
Match Waiver Criteria

• All waivers must be well justified.

• At a minimum, all SAAs must consider:
  – Practical and/or logistical obstacles;
  – Local resource constraints (e.g. rural communities with limited local funds or volunteer capacity);
  – Degree of VOCA funding increase in comparison to local funding increases; and
  – Past ability to provide match.
Resources


OVC PMT: [https://ovcpmt.ojp.gov/](https://ovcpmt.ojp.gov/)

GMS: [https://grants.ojp.usdoj.gov/gmsexternal/login.do](https://grants.ojp.usdoj.gov/gmsexternal/login.do)

FSRS: [https://www.fsrs.gov/](https://www.fsrs.gov/)

VOCA Administrator’s Page: [https://www.ovc.gov/VOCA-Administrators.html](https://www.ovc.gov/VOCA-Administrators.html)
Please contact the OVC Main Line to be connected to your Grant Manager

202–307–5983
Additional Reporting Requirement Questions for Discretionary Training Grants

Reporting Requirements

The reporting requirements noted in this section are designed to provide the grantor agency with sufficient information to monitor grant implementation and goal achievement. To support effective monitoring of the grant, reports must be keyed to the grant implementation plan provided in the grant application. Specifically, the report should:

1. Indicate status of each goal that was due for completion during a previous reporting period but carried over due to implementation of other problems.
2. State the status of each goal which was scheduled to be achieved during the report.
3. State the correction action planned to resolve implementation problems and state the effect of these problems on the remaining schedule for achieving the project remaining goals.
4. If appropriate, identify changes that are needed in the implementation plan specified in the grant application to overcome problems. Changes that alter plans and/or goals set forth in the application require prior grantor agency approval and issuance if a Grant Adjustment Notice (GAN).
5. State what technical assistance the grantor agency might provide during the next six-month period to help resolve implementation problems. If technical assistance has been provided to resolve implementation problems, state the problems (or tasks) addressed and the results (of impact) of the assistance provided.
6. Based on the performance measure set forth in the grant application (implementation plan), indicate in quantitative terms the results (of the project) achieving both during the reporting period and the cumulative-to-date. Explanatory and qualifying statements will be helpful here, especially if project objectives have changed.