



## Subgrantee Programmatic and Fiscal Compliance Policy

### Special Conditions

This compliance policy should be read in conjunction with each grant program's special conditions. Subgrantees are responsible for abiding by all the requirements outlined in their grant program's special conditions. CJCC staff and the Council reserve the right to apply any of the progressive penalties outlined for subgrantees that are not compliant with their grant program's special conditions. Timely fiscal and programmatic reporting requirements are also outlined in each grant program's special conditions.

### Grant Applications

**Grant Application Submission Policy:** All grant applications must be received by **the pre-specified time** on the deadline date provided.

- **Continuation Application Late Submission Policy:** Any continuation grant application submitted late may receive a 10% reduction.
- **Competitive Application Late Submission Policy:** Any grant application submitted late during a competitive cycle will be deemed ineligible and will not be considered or reviewed unless the Council votes to accept late applications. Disqualified applicants will have to wait for the next competitive cycle to reapply.

### Award Package

**Award Package Submission Policy:** All award packages will be sent by mail or provided in-person during subgrantee training workshops. The subgrantee will have (45) calendar days from the date of receipt to return the award package to CJCC unless a specific date is given. Award packages must be **postmarked** no later than the due date to be considered timely.

- **Penalty for late submission:** Award packages not postmarked by the due date may result in an automatic 10% reduction in the award amount. The subgrantee will receive notice of any reductions and will be given an additional ten (10) calendar days to return the award packet. Award packets must be **postmarked** no later than the revised due date to be considered timely for the late submission.
- **Penalty for failure to submit award package:** If an award packet is not postmarked or received by the revised deadline, the award may be rescinded.

### Subgrant Reporting

During the course of an award period, subgrant recipients are required to submit periodic programmatic and financial reports to the CJCC. These reports may include:

- Quarterly and Semi-annual Activity Reports (Victim Services Statistical Reports (VSSR), Criminal Justice Services Statistical Reports (CJSSR))
- Outcome Measurement Reports (Annual)
- Local Victim Assistance Program (LVAP or 5%) Reports
- Expenditure Reports (Monthly or Quarterly)

**Subgrant Report Submission Policy:** All reports must be received on or before the deadline. A report is considered to be received timely if it is:

- postmarked on or before the due date for **mailed submissions**,
- received by 5:00 pm on or before the due date for **hand-delivered submissions**, or
- submitted by 11:59 pm on or before the due date for **digital submissions**.

**Penalties for late submissions:** When a subgrantee fails to submit any of their required reports on time, all pending grant payments to the agency may be suspended until the missing report is submitted.

In addition, each subgrant will be reviewed quarterly. If a subgrantee failed to meet the deadline of any report due during a quarter, a reduction of ten percent (10%) may be made to the corresponding subgrant award. A report is considered due during a quarter if the end date of the reporting period falls within the quarter.

If a subgrantee fails to meet the reporting requirements for two (2) quarters during the grant period, CJCC may initiate a site visit and any pending payments may be held until the site visit is complete (this may in addition to a second 10% reduction to the subgrant award).

If a subgrantee fails to meet the reporting requirements for four (4) quarters during the grant period, they may be placed on probation\* for one year. If needed, this probation period will continue during the following year's continuation and/or competitive award period (this is in addition to a possible fourth 10% reduction to the subgrant award).

### **Waivers to Excuse Late Reports**

In certain instances, subgrantees may experience unprecedented and unpredictable events that will preclude them from complying with their special conditions or from submitting their fiscal and/or programmatic reports on time. CJCC will consider such circumstances and may grant a waiver for the late submission of all reports with the exception of competitive grant applications. The waiver will relieve the subgrantee of any penalties associated with the late submission.

Examples of circumstances in which a waiver may be granted:

- Natural disasters that substantially affect an agency's operations,
- Sickness, injury, or death of the Project Director or members of his/her immediate family,
- Major criminal events that require substantial staff resources, and/or
- Catastrophes, fires, or vandalism that results in substantial damage to the agency's resources and thus ability to comply with programmatic or fiscal reports.

**Process for submitting waivers:** Agencies must submit a waiver request to the assigned Grants Specialist for a late submission along with supporting documentation no later than ten **(10) days after the reporting deadline has expired**. The waiver request must be on agency letterhead and should include the following:

- Subgrant number,
- Completed report (if not previously submitted),
- Written explanation of event(s) that prevented the subgrantee from submitting a timely report,
- Supporting documentation of relevant event(s), and
- Authorized official's signature.

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\* Probation is a year-long period during which the subgrantee cannot be late submitting their continuation/competitive application, award packet, and/or fiscal or programmatic reports. Any late submissions of programmatic or fiscal reports during the probation period may result in the automatic de-obligation of subgrantee's remaining award. If the subgrantee submits its application or award packet late during the probation period, the entire award may be rescinded for that grant year.