



## Victims of Crime Act (VOCA) Subgrantee Administration Manual

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## Introduction

Criminal Justice Coordinating Council (CJCC) staff created this manual to help subgrantees navigate some of the complexities associated with their Victims of Crime Act (VOCA) grant. This manual is not comprehensive; therefore, you may still encounter issues or questions related to managing your grant that are not covered in this document. This manual does not replace the requirements in your special conditions which govern your use of VOCA funds. However, this manual should help you implement and abide by those special conditions more effectively.

This manual is one of many tools to guide the administration of your VOCA subgrant. What follows is a detailed, though not exhaustive, description of the programmatic and financial guidelines you must follow to administer your grant funds successfully. The information contained in this manual is based on several sources including the [VOCA Assistance Rule](#) and the [Department of Justice Grants Financial Guide](#). CJCC encourages subgrantees to refer to these resources as often as needed to assist in any questions or concerns related to their VOCA grant.

Please note that CJCC may also update this manual from time to time as legislation changes, new policies or guidance comes from the OVC, new reimbursement or grant management policies are instituted here at CJCC, or to address emerging issues subgrantees face. Staff will do their best to alert subgrantees about changes to this manual. Please ensure you are subscribed to our [Mail Chimp](#) listserv to receive these updates.

We have also tried to make this manual as user-friendly as possible. All the text that is hyperlinked in this manual is fully functional – to go to the webpage containing the information that is referred to in the text, simply click on the hyperlinked text.

Thank you for all the work you do on behalf of victims of crime in the state of Georgia. We at CJCC appreciate your service and dedication.

## Overview of The Criminal Justice Coordinating Council

The CJCC is the designated State Administering Agency (SAA) for the VOCA assistance grant program. Created by the Georgia General Assembly in 1981 as an Executive Branch agency, the CJCC represents the culmination of many efforts to establish a statewide body that would build consensus and unity among the state's diverse and interdependent criminal justice system components. The CJCC is legislatively charged with eleven areas of criminal justice coordination. Among those responsibilities is to serve as the statewide clearinghouse for criminal justice information and research, develop criminal justice legislative and executive policy proposals, and serve in an advisory capacity to the governor on issues impacting the criminal justice system.

The CJCC builds knowledge and partnerships among state, local, and non-governmental organizations to enhance the effectiveness of Georgia's criminal justice system and to develop and sustain results-driven programs, services, and activities. As the SAA for the VOCA grant program, CJCC provides financial and programmatic management of your VOCA subaward.

CJCC also administers the Georgia Crime Victims Compensation Program (CVCP). Established by the State Legislature in 1988, the CVCP offers financial support to innocent victims of violent crimes and encourages greater victim participation in the criminal justice process. Crimes covered under the CVCP include, but are not limited to, homicide, sexual assault, commercial sexual exploitation of minors, domestic violence, assault/battery, vehicular homicide, and driving under the influence (DUI)/driving while intoxicated (DWI).

The CVCP is a payer of last resort and certain requirements must be met, but eligible applicants may receive compensation benefits up to \$25,000 to help with medical and dental care, mental health counseling, economic support, crime scene clean-up, and funeral expenses when the costs are not covered by a third-party payer.

### ***Vision***

*A Georgia where criminal justice and victims' service programs are just, accessible, and compassionate.*

### ***Mission***

*Innovating Criminal Justice—Empowering Victims*

## Victims of Crime Act Assistance Grant Program

The VOCA Formula Grant Program, created under the 1984 Victims of Crime Act, provides federal funding to support victim assistance and compensation programs, to provide training for diverse professionals who work with victims, to develop projects to enhance victims' rights and services, and to undertake public education and awareness activities on behalf of crime victims. The Office for Victims of Crime (OVC) was created by the U.S. Department of Justice (DOJ) and formally established by Congress in 1988 through an amendment to the Victims of Crime Act of 1984. The OVC provides federal funds to support victim assistance and compensation programs around the country. The Crime Victims' Fund is the source of funding for these programs. Millions of dollars are deposited into the Crime Victims' Fund annually from criminal fines, forfeited bail bonds, penalties, and special assessments collected by U.S. Attorneys' Offices, federal U.S. courts, and the Federal Bureau of Prisons. To date, Crime Victims' Fund dollars have always come from offenders convicted of federal crimes, not from taxpayers.

VOCA is the largest federal victims' services funding stream in Georgia. This funding supports direct services to crime victims (i.e. persons who have suffered physical, sexual, financial, or emotional harm as a result of the commission of a crime). The federal OVC makes annual formula grants to states, which in turn are subgranted to local organizations, to ensure that crime victims' rights are upheld and that they play a meaningful role in the criminal justice process. VOCA funds help local agencies comply with the requirements in Georgia's Crime Victim's Bill of Rights (O.C.G.A. § 17-17-1) and provide services that help crime victims confront the trauma and hardship associated with victimization. VOCA funds may be used to serve victims of many different types of crime including child abuse, child sexual abuse, domestic violence or intimate partner violence, sexual assault, physical and financial elder abuse, identity theft, robbery, and burglary.

According to VOCA Program Rules, direct services or services to victims of crime are defined as those efforts that:

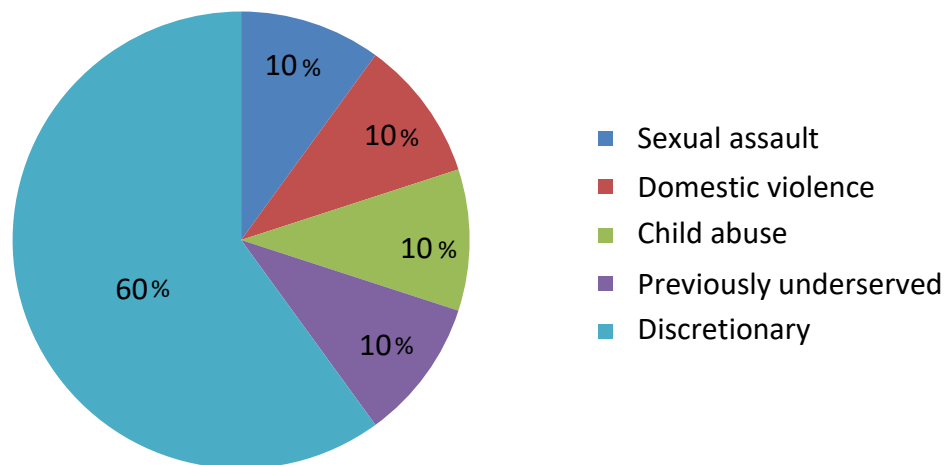
- (1) respond to the emotional, psychological, and physical needs of crime victims,
- (2) assist victims to stabilize their lives after victimization,
- (3) assist victims to understand and participate in the criminal justice system, or
- (4) restore a measure of safety and security for the victim.

For the purpose of the VOCA crime victim assistance grant program, a crime victim or victim of crime is a person who has suffered physical, sexual, financial, or emotional harm as a result of the commission of a crime. Generally, funding cannot be used for the investigation of crimes or collection of evidence to further the prosecution of crimes.

Under the VOCA Program Guidelines and Rules, funding priority is given to programs serving victims of sexual assault, child abuse, and domestic violence. At least 30% of each year's formula grant must be allocated to sexual assault, child abuse, and domestic violence services, 10% for each category. An

additional 10% must also be allocated to victims of violent or property crime who are “previously underserved,” which indicates that the particular victim population historically or currently has not had access to, or been provided with, specialized or adequate services. OVC includes groups as underserved or unserved when their access to services is limited by factors like language barriers, economic limitations, disabilities, or location. Groups of victims who fall into this category may be identified by the type of crime they experience, characteristics of the victim, or both. Victims may differ between jurisdictions, and examples include DUI/DWI victims, survivors of homicide victims, American Indian/Alaska Native victims in certain jurisdictions with insufficient victim service resources, victims of physical assault, adults molested as children, victims of elder abuse, victims of hate and bias crime, victims of kidnapping, child victims and adult survivors of child pornography, child victims of sex trafficking, victims of violent crime in high crime areas, LGBTQ victims, victims of federal crimes, victims of robbery, and victims of gang violence.

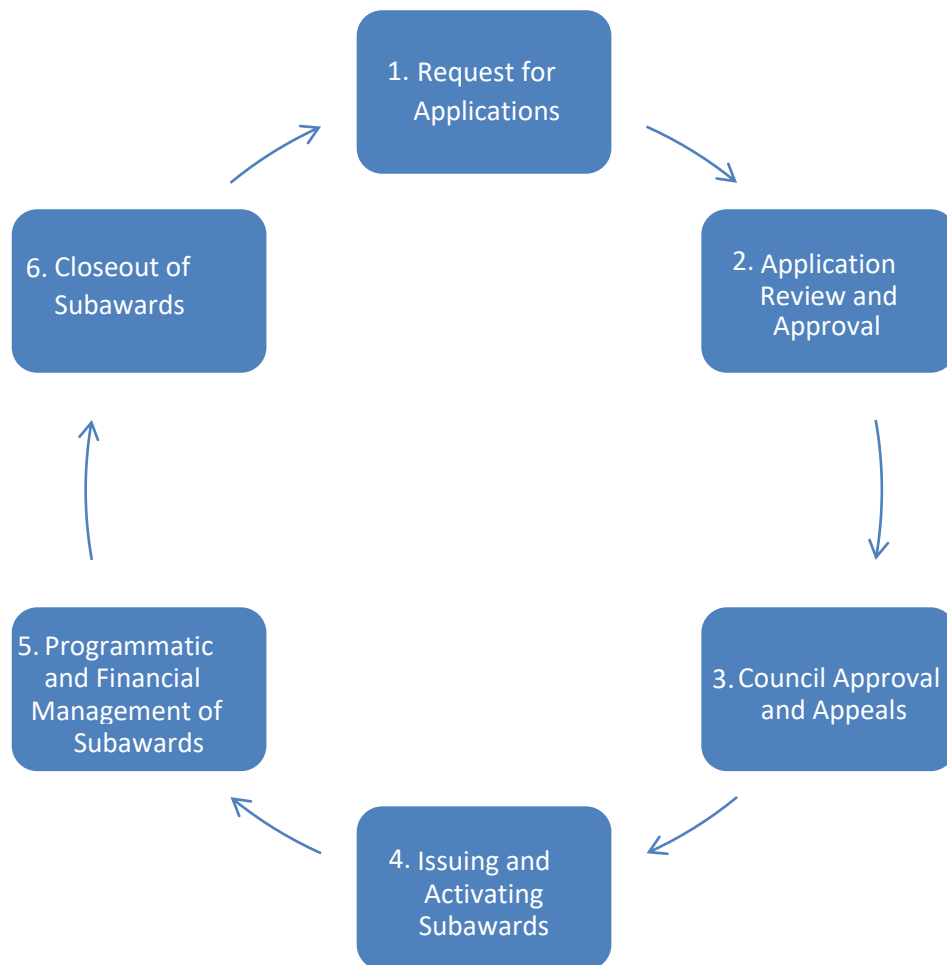
### Federal VOCA Allocation Requirements



As stated above, VOCA funds are intended to assist agencies in providing core services to crime victims which will encourage and support healing from the emotional, psychological, and physical trauma associated with their victimization. VOCA funds also serve to help victims play a meaningful role in the criminal justice system. States have sole discretion in determining which organizations receive funds, and in what amounts, so long as the organization meets the minimum requirements of the VOCA Program Guidelines. In addition to organizing and overseeing the distribution of funds, CJCC monitors subgrantees’ fiscal and program performance and submits required progress reports to OVC.

## Life Cycle of a VOCA Subaward

Traditionally, CJCC releases a Request for Applications (RFAs) each year, collects and reviews applications, and makes award recommendations to the governing Council. Upon the Council's approval, CJCC is responsible for opening and closing each subaward in accordance with federal guidelines. See below for diagram of the life cycle of a VOCA subgrant award.



CJCC operates its Victim Assistance funds on a 4-year grant cycle. The first year serves as a competitive year in which any agency or organization can apply for funding if it meets the eligibility requirements. The subsequent second, third and fourth years are continuation years in which the awardees receive the same funding level as in the first year, with a few exceptions, as long as they have met and continue to meet their respective grant requirements. The end of the fourth year is the beginning of the new 4-year grant cycle. However, depending on the availability of funds, CJCC may release competitive funding opportunities at any point during the 4-year grant cycle.

This guide will cover the life cycle of a CJCC grant award. It will mainly focus on the financial and programmatic management of your agency's subgrant.

**Financial management encompasses the following activities:**

- Budget review and approval during the application process
- Activating awards through the award packet issuance, review and approval process
- Budget management through Subgrant Adjustment Requests (SARs)
- Reviewing, approving, and processing payments via Subgrant Expenditure Reports (SERs)
- Closeout of awards at the end of the award period (September 30<sup>th</sup>)

**CJCC provides programmatic management through the following activities:**

- Program activity review and approval during the application process
- Reporting on service outputs and outcomes (Victim Service Statistical Report (VSSR))
- Adherence to VOCA program guidelines on allowable activities
- Adherence to CJCC core service requirements
- Ensuring availability and accessibility of core services
- Facilitating communication and coordination of CJCC-funded programs with other stakeholders

CJCC also provides grants management to its subgrantees by conducting compliance monitoring activities such as on-site visits, desk reviews, and providing training and technical Assistance (TTA or TA).

More information on each aspect of the grant management process is included in the subsequent sections.

## **VOCA Eligibility Requirements**

Applicants are limited to agencies that provide direct services to victims of crime, and are operated by a public agency, a nonprofit organization, or a combination of such agencies or organizations.

Eligible organizations include victim services organizations whose sole mission is to provide services to crime victims. These organizations include but are not limited to: sexual assault and rape treatment centers, domestic violence programs and shelters, child abuse programs, centers for missing children, mental health services, and other community-based victim coalitions and support organizations.

In addition to victim service organizations whose sole purpose is to serve crime victims, many other public and non-profit organizations have components which offer services to crime victims. These organizations are eligible to receive VOCA funds if the funds are used for projects that deliver services to crime victims. These organizations include, but are not limited to, the following:



- Criminal Justice Agencies – Law enforcement agencies, prosecutors’ offices, courts, corrections departments, and probation and paroling authorities are eligible to receive VOCA funds to help pay for direct victims’ services.
- Religiously-Affiliated Organizations – Organizations receiving VOCA funds must ensure that direct services are offered to all crime victims without regard to religious affiliation and that the receipt of services is not contingent upon participation in a religious activity or event. Faith-based and community organizations will be considered for awards, as are other eligible applicants, and if they receive assistance, awards will be treated on an equal basis with all other grantees in the administration of such awards. No eligible applicant or grantee will be discriminated against on the basis of its religious character, affiliation, or name. Faith-based and community organizations are required to abide by the same regulations and requirements specifically associated with the program under which they are awarded a grant just as any other agency awarded funding.
- Hospitals and Emergency Medical Facilities - Organizations must offer crisis counseling, support groups, and/or other types of direct victim services.
- Others – State and local public agencies such as mental health service organizations, state and/or local public child and adult protective services, state grantees, legal service agencies and programs with a demonstrated history of advocacy on behalf of domestic violence victims, and public housing authorities that have components specifically trained to directly serve crime victims.

### **Additional Specific Eligibility Requirements**

VOCA-established eligibility criteria must be met by all organizations that receive VOCA funds. These funds are to be awarded to applicants only for providing services to victims of crime through their staff. Each applicant organization shall meet the following requirements:

- Public or non-profit organization – To be eligible to receive VOCA funds, organizations must be operated by a public or private non-profit organization, or a combination of such organizations, and provide services to crime victims.
- Mandated use of volunteers – Programs must use volunteers in order to be eligible for VOCA funds. Waivers may be available for the volunteer requirement.
- Provide match – All VOCA subgrantees must provide at least a 20% cash or in-kind match from nonfederal sources to the federal amount awarded. This requirement does not apply to federally recognized tribes or projects conducted on tribal land nor U.S. territories excluding Puerto Rico. Full or partial waivers may be available for the 20% match requirement. See section “[Match \(Cost Sharing\) Requirements](#)”.
- Record of effective services – Demonstrate a record of providing effective services to crime victims. This includes having the support and approval of its services by the community, a history of providing direct services in a cost-effective manner, and a breadth or depth of financial support from other sources. For a glossary of terms and services, please refer to the [2018 VSSR Guide](#).

- Diverse funding sources for new programs – Those programs that have not yet demonstrated a record of providing services may be eligible to receive VOCA funding if they can demonstrate that at least 25% of their financial support comes from non-federal sources in the year of or the year preceding the award. Generally, organizations should have a variety of funding sources besides federal funding in order to ensure their financial stability.
- Promote community efforts to aid crime victims – Promote community-based coordinated public and private efforts to aid crime victims. Coordination may include, but is not limited to, serving on state, federal, local, or Native American task forces, commissions, working groups, coalitions, and/or multidisciplinary teams. Coordination efforts also include developing written agreements that contribute to better and more comprehensive services to crime victims.
- Coordination efforts qualify an organization to receive VOCA victim assistance funds but are not activities that can be supported with VOCA funds since “coordination” itself is not a service provided directly to victims.
- Help victims apply for compensation benefits – Assist potential recipients of crime victim compensation benefits (including potential recipients who are victims of federal crime) in applying for such benefits including, but not limited to, referring potential recipients to an organization that can assist, identifying crime victims and advising them of the availability of such benefits, assisting potential recipients with application forms and procedures, obtaining necessary documentation, monitoring claim status, and intervening on behalf of potential recipients with the crime victims’ compensation program.
- Comply with federal rules regulating grants – Applicants must comply with the applicable provisions of VOCA, the Program Guidelines, and the requirements of the [Department of Justice Grants \(OJP\) Financial Guide](#) which includes maintaining appropriate programmatic and financial records that fully disclose the amount and disposition of VOCA funds received. Other requirements are also outlined in the special conditions to the subgrant award. This includes financial documentation for disbursements, daily time and attendance records specifying time devoted to allowable VOCA victim services, client files, the portion of the project supplied by other sources of revenue, job descriptions, contracts for service, and other records which facilitate an effective audit.
- Comply with CJCC grant requirements – Agencies must adhere to financial and programmatic guidelines, comply with deadlines, and provide all information to the CJCC and/or other state/federal agencies as requested in a timely fashion, including the Office of the Inspector General, Georgia Department of Audits and Accounts, and DOJ.
- Services to victims of federal crimes – Applicants must provide services to victims of federal crimes on the same basis as victims of state and/or local crimes.
- Promote victim safety – CJCC prohibits activities that compromise victim safety, such as requiring victims to meet with offenders.
- No charges to victims for VOCA-funded services – Applicants must provide direct services to crime victims, at no charge, through the VOCA-funded project unless CJCC approves a waiver allowing the applicant to generate program income by charging for services.

- Maintain confidentiality – Eligible agencies must have policies and procedures in place that safeguard the confidentiality of all victim records, contact information, personally identifying information, and other information considered sensitive. These measures must be consistent with applicable federal, state, and local laws regarding privacy and confidentiality. Policies and procedures must allow for information sharing of certain non-personally identifying data and court, law enforcement, and prosecution-generated information in certain circumstances.
- 5% Local Victim Assistance Program certification and eligibility – Applicant agencies must be certified and eligible to receive 5% funds. Agencies without certification may apply for funding; however, if funding is awarded the agency will have to complete [certification requirements](#) prior to drawing down funds.

## Agency/Organization/Program Requirements

### Religion

Programs may not promote, discuss, or teach religion. Program activities and services are required to be accessible to any interested participant, regardless of religious affiliation.

### Criminal Background Checks

All subgrantees must conduct a state or national criminal background check on all direct service and outreach personnel who have contact with victims and their children once every three years. Agencies must use Cogent Systems, Georgia Applicant Processing Services or Federal Bureau of Investigation Departmental Order to conduct a state or national background check on all direct service shelter and outreach staff every three years.

### Internet Security Policy

CJCC requires all subgrantees to establish and enforce an Internet Security Policy when participants, volunteers, and/or staff have access (supervised or unsupervised) to protect the confidentiality, integrity, and availability of data while preventing malicious and other security threats. This includes any technology provided by CJCC funding and technology utilized by participants during a CJCC funded program component.

### Comply with CJCC grant requirements

Agencies must adhere to financial and programmatic guidelines, comply with deadlines, and provide all information to CJCC, as requested, in a timely manner.

## **Fiscal Accountability**

Commingling of funds on either a program-by-program or project-by-project basis is prohibited. The subgrantee's accounting system must maintain a clear audit trail for each source of funding for each fiscal budget period and include the following:

- Separate accountability of receipts, expenditures, disbursements and balances. CJCC recommends creating an account in your accounting system for each grant using the grant number provided by CJCC.
- Itemized records supporting all grant receipts, expenditures and match contributions in sufficient detail to show exact nature of activity.
- Data and information for each expenditure and match contribution with proper reference to a supporting voucher or bill properly approved.
- Hourly timesheets describing work activity, signed by the employee and supervisor, to document hours personnel worked on grant related activities. Match hours must be documented in same manner.
- Maintenance of payroll authorizations and vouchers.
- Maintenance of records supporting charges for fringe benefits.
- Maintenance of inventory records for equipment purchased, rented, and contributed.
- Maintenance of billing records for consumable supplies (i.e., paper, printing) purchased.
- Provisions for payment by check.
- Maintenance of travel records (i.e., mileage logs, gas receipts).
- Lease agreements, contract services, and purchases of equipment that adhere to established procurement processes.

See [Appendix 10](#) for more on Subgrantee Financial Management Requirements

## **Office of Civil Rights**

Pursuant to 28 C.F.R. Section 42.302, all subgrantees of federal funds must be in compliance with [Equal Employment Opportunity Plan](#) (EEO) and [Civil Rights requirements](#). All programs that receive VOCA funds or are subawarded VOCA funds via program agreements are required to be familiar with and comply with all relevant federal civil rights requirements, and to that end are required to participate in the designated training once per grant period. If there is a violation, it may result in suspension or termination of funding until such time as the subgrantee is in compliance. More information on the required **annual** OJP Civil Rights trainings can be found [here](#).

## **Nondiscrimination**

Federal laws prohibit subgrantees of financial assistance from discriminating on the basis of race, color, religion, national origin, sex, or disability in funded programs or activities, not only in respect to employment practices but also in the delivery of services or benefits. Subgrantees must maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age, and disability, within the timetable established by CJCC. Compliance with guidance, as may be issued from time to time by the Office for Civil Rights and CJCC, is required per 28 C.F.R. part 42.

### Limited English Proficiency Individuals

In accordance with DOJ Guidance pertaining to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, subgrantees of federal assistance must take reasonable steps to provide meaningful access to their programs and activities for persons with limited English proficiency (LEP). Access <http://www.lep.gov> for more information. CJCC requires subgrantees to have written LEP plans that outline their policies and procedures for ensuring victims have access to necessary forms of communication, both written and verbal.

### Equal Employment Opportunity Plans

The applicant agency must meet the requirements of 28 CFR 42.301-308 [EEO](#) Program Guidelines. The plan must cover the grant period specified in the application. If technical assistance is needed, please visit the [EEOP FAQ](#) page to determine what constitutes an EEO program or other related reporting requirements.

What is the recipient type?	What is the award amount?	What is the number of employees?	Does the recipient need to develop an EEOP?	Does the recipient need to submit a Certification Form to OCR?	Must the recipient submit an EEOP to OCR?
Nonprofit, Indian Tribe, Medical, or Education Institution	Does not matter	Does not matter	NO	YES ( <a href="#">Section A</a> )	NO
State or local government and private entity	Less than \$25,000	Does not matter	NO	YES ( <a href="#">Section A</a> )	NO
State or local government and private entity	Does not matter	Less than 50 employees	NO	YES ( <a href="#">Section A</a> )	NO
State or local government and private entity	\$25,000 or more, but less than \$500,000, for an individual grant	50 or more employees	YES	YES ( <a href="#">Section B</a> ) Certifying that the recipient has created an EEOP and is maintaining it on file in a designated office for review by employees, applicants, OCR, or a state administrative agency.	NO
State or local government and private entity	\$500,000 or more for an individual grant	50 or more employees	YES	NO	YES

### Special Conditions

At the time of the subgrant award, CJCC will assign special conditions for each approved project. Each subgrantee should refer to their award packet for their special conditions. Applicants agree to comply with all the guidelines set forth by CJCC. These guidelines can be found in the [Subgrantee](#)

[Programmatic and Fiscal Compliance Policy](#) on CJCC’s website. Any programmatic and/or fiscal non-compliance may result in a reduction of the award.

## **Other**

Applicants must comply with all forms, assurances, and certifications as prescribed by the CJCC. This includes maintaining a [DUNS](#) number, [EIN](#), active registration with the [System for Award Management \(SAM\)](#), and other federal forms as requested by CJCC.

## **Applying for VOCA Funds**

CJCC releases a VOCA Request for Applications (RFAs) on an annual basis. The date varies, but staff aims to release RFAs in late spring. Once the RFA is released, applicants have 30 to 45 days to complete and submit the application via CJCC’s online process. The RFA contains all information required for each application, including application instructions and guidelines on allowable and unallowable costs. Generally, the application requires basic agency information, contact information, brief narratives on program activities and target population demographics, and a budget for the use of VOCA funds. The application also requires submission of data on VOCA purpose areas, underserved populations, agency financial information, and other documentation as requested.

Once the application has closed, all applications and attachments are reviewed by the CJCC Victim Assistance Division staff. Applications are primarily reviewed based on three basic criteria:

- Submission of complete and accurate information,
- Programmatic compliance with federal and state guidelines, and
- Financial compliance in that all costs are admissible, justifiable, and reasonable per the federal and state guidelines.

Staff will review applications and make award recommendations to the governing Council. The review process typically takes 6-8 weeks before recommendations go to the Victim Assistance Grants Committee, who approve or deny staff recommendations for funding. Occasionally, the Committee requests additional information from staff and/or applicants. Once approved by the Committee, the staff recommendations go to the full Council for approval.

## **Agency Risk Assessment**

Subgrantees are required to complete an agency risk assessment before the application can be considered for funding. This assessment ensures compliance with the Federal Office of Management and Budget (OMB) Uniform Guidance (200.331(b)) which require that CJCC conduct a financial review and evaluate each subgrantee’s risk of non-compliance (statute/regulations/terms of award) for purposes of monitoring. The information provided is used to assess your compliance with financial and programmatic requirements in accordance with state and/or federal regulations.

## Funding Decisions and Appeals

All funding decisions related to the VOCA grant program from this solicitation are based on the availability of funding and recommendations of the CJCC staff review panel to the Victim Assistance Grants Committee. The Committee votes to accept or deny staff recommendations, which are subject to the Council’s approval.

CJCC informs applicants of funding decisions through grant award or denial letters. Applicants should not make assumptions regarding funding decisions until they have received official written notification of award or denial that is signed by either CJCC’s Executive Director or Deputy Director. Applicants have the opportunity to appeal the initial funding decision within fifteen business days of the date on which the award/denial notice was postmarked. Appeals should be submitted in the form of a cover letter on the applicant agency’s letterhead along with any supporting documentation. You may submit an appeal in writing to:

**Criminal Justice Coordinating Council  
ATTN: Victim Assistance Grants Division  
104 Marietta St. NW Suite 440 Atlanta, GA 30303**

CJCC strives for transparency in its VOCA application and award process. The working timeline for applications and awards is as follows:

VOCA Application Timeline
Release Request for Applications
Application Closed
Applications Reviewed
Award Packets Sent to Subrecipients
Award Workshops
Award Packets Due to CJCC
Start of VOCA grant year (October 1 <sup>st</sup> )

## Activating the VOCA Award

Each year, CJCC issues award packets to its subgrantees. If receiving more than one award, an agency will receive a packet for each award received. These award packets contain documentation to be completed and returned to CJCC within 30 to 45 calendar days of their issuance.

Timely submission of correctly completed award packets is important for the management of your agency's subaward. If these packets are not received by the deadline specified and completed according to the instructions, it may delay the activation of your award. An award is activated to enable the processing of expenditure requests, so delays in activation results in delays in payments, which can interrupt service delivery to victims and hinder the agency's cash flow. Please ensure your award packet is completed correctly and submitted on time so CJCC can activate and manage your grant funds.

## Match (Cost Sharing) Requirements

All VOCA subgrantees must match at least 20% of their total award with **non-federal** funds. Match is defined as the subgrantee's contribution to the project in addition to the federal award received and must adhere to the same financial guidelines as reimbursable expenses. First-time subrecipients must also demonstrate that 25-50% of their agency's funding is derived from non-federal sources. VOCA funding is meant to sustain a core level of victim services. CJCC wants to ensure that agencies have various resources to provide services so that all victims across Georgia have access to basic and enhanced services.

### Matching funds must meet the following criteria:

- 1) They must have the same potential use as the federal funds for which the grant is awarded – i.e. the activities for which funds are used must be **allowable** under the [VOCA Program Rules](#).
- 2) They must be expended during the grant period – e.g. a private foundation grant that has been awarded to you but starts after the federal grant period ends does not qualify.
- 3) You must maintain a record of all the matching funds you use including:
  - a) The source of the funds
  - b) The amount
  - c) Period used
  - d) Contractual agreements (if applicable)
- 4) Match **cannot** be:
  - a) From a Federal source
  - b) Program income
  - c) Used to match another Federal grant

### There are two types, or classifications, of match:

- Cash Match – Actual cash paid by the recipient for allowable items/services which support and/or enhance the program's goals and objectives.
- And**
- In-kind Match – Allowable items/services donated to the recipient which support and/or enhance the program's goals and objectives.



## Formula(s) for Match Calculation

Federal Award + Match Requirement = Total Project Cost

1. Total Project Cost x Match Requirement Percentage = Match Requirement
2. Federal Award / 4 = Match Requirement
3. Total Project Budget – Federal Award = Match Requirement

### Example 1:

For a project with a total project cost of \$100,000 and a 20% Match Requirement Percentage:

1. \$100,000 x 20% = \$20,000 (Match Requirement)
2. \$100,000 - \$20,000 = \$80,000 (Grant Request/Federal Amount)

## Match Waivers

If an agency would like to request a match waiver, a letter must be submitted on agency letterhead to the CJCC at the time of application. The letter should outline the reasons why the agency will have trouble meeting the full match requirement and should indicate the amount of match the agency will be able to provide. CJCC staff will review the waiver request to determine eligibility and if it should be forwarded to the OVC. CJCC will compile all eligible match waiver requests and send them to OVC at the same time. In order to request a match waiver, include the request along with the award package when it is submitted.

Letters requesting a match waiver should include the following minimum elements:

- A brief description of the agency and the VOCA-funded project
- A brief explanation of why the full match amount is a hardship for the agency
- A brief description of how not receiving a match waiver may result in fewer victims being served
- When appropriate, describe why the agency will not be able to retain the number of volunteers needed to meet the match requirement
- Indicate how much match the agency will be able to provide
- Any other important information deemed necessary by the requesting agency

Please see the Request for Match Waiver [directions and sample](#) on the CJCC website.

## Volunteer In-kind Match

VOCA eligibility criteria require agencies to use volunteer labor to provide services at some capacity within its agency. As of October 1, 2018, CJCC values volunteer hours at \$15.00/hour. Volunteer hours may be used toward your agencies match on the VOCA subgrant. If your agency is unable to use volunteers you may submit a waiver requesting this requirement be removed. Approval of the volunteer waiver is granted to agencies if CJCC determines there is a compelling reason to waive this

requirement. A “compelling reason” may be a statutory or contractual provision concerning liability or confidentiality of counselor/victim information, which bars using volunteers for certain positions, or the inability to recruit and maintain volunteers after a sustained and aggressive effort. Note: Although CJCC no longer requires agencies to submit a minimum level of volunteers as match, applicant organizations must use volunteers to be eligible for VOCA funds. In addition, CJCC encourages agencies to utilize volunteers to the greatest extent possible.

If you are using volunteer labor as a match, you must provide a volunteer contract and a log of the number of hours each volunteer spent on the VOCA-funded project. Submit newly signed contracts and timesheets with each SER to your assigned grants specialist. You may also send CJCC a request to approve a higher rate of volunteer time. Please submit justification such as a memo and job description or volunteer’s resume with the request for a higher rate.

## **Budget Requirements**

All applicants must complete a “Detailed Budget Worksheet”. All line items within the budget are subject to review and approval. Decisions related to these budget line items are based on allowance of line item costs per VOCA Program Guidelines, justification of costs in relation to project activities, and reasonableness of costs based on current market rates.

The detailed budget must reflect the federal award amount stated on the Subgrant Award Document. All projects must submit a minimum funding match of 20% through cash and/or in-kind contributions unless a waiver will be requested. The sources of the match must be identified in the budget section of the application. As stated above, CJCC currently values volunteer hours at \$15.00 per hour unless a written request is submitted for a higher rate via a Subgrant Adjustment Request which should be included in the award packet.

The requirements and limitations that apply to the use of federal funds also apply to the use of matching funds. Matching funds must be used only for the VOCA-funded project during the grant period to support the identified goals, objectives, and activities. Thus, the matching funds cannot be used to support activities that are not concurrently supported by VOCA formula funds.

## **Program Income**

The DOJ, Office of Justice Program (OJP), and OVC allow the use of program income only to supplement project costs or reduce project costs to be refunded to the Federal government. Program income is restricted to the same uses as the grant award and must be expended during the grant period in which it is generated.

“Program income” is gross income earned during the funding period by the subgrantee as a direct result of the grant award. Fines and penalties as a result of law enforcement activity are not

considered program income. VOCA applicants must obtain prior approval from CJCC to earn or use program income for the VOCA funded program/project.

### **Supplanting**

Supplanting is the deliberate reduction of state, local, or tribal government appropriated funds, specifically because federal funds are available (or expected to be available) to fund the same activity. Any reduction in non-federal resources allocated for the same time period and the same purpose as the federal grant award will be subject to careful review.

*To avoid potential supplanting issues, the following general guidelines should be followed:*

- Federal funds cannot be used to pay for existing employees unless the existing position is “back-filled” with a new hire.
- Federal funds cannot be used to pay for items or costs that the subgrantee is already obligated to pay with state, local, or tribal funds.
- State, local, or tribal funds previously appropriated, allocated, or budgeted for award purposes cannot be reduced or reallocated to other purposes because of receipt of federal funds.
- Maintain contemporaneous documentation demonstrating that any reductions in nonfederal resources budgeted for award purposes is unrelated to the receipt or expected receipt of federal funds. Examples of supporting documentation may include (but are not limited to) budget sheets and/or directives, city council or departmental meeting minutes, agency memoranda, notices, or orders, and any other official documents addressing the reduction in non-federal resources.

Funds must be used to supplement existing funds for program activities and cannot replace or supplant funds that have been appropriated for the same purpose. Supplanting may be grounds for suspension or termination of current and future federal funding, recovery of misused federal funds, and/or other remedies available by law

### **Budget Categories**

Subgrantees should note that they **cannot** request reimbursement for items not listed in their approved budgets during the grant period. If a subgrantee wants to add, change, or remove an item from any of the budget categories approved with their award package, they **must submit** a [Subgrant Adjustment Request](#) (“SAR”). Please see the section titled “Subgrant Adjustment Requests” for more information.

Below are the requirements for budgeting by budget category:

### ***Personnel***

Personnel costs are eligible if they comply with the statements in the following checklist: Salaries for grant-funded positions must comply with the applicant agency’s employee salary classification

schedule. Your agency should have submitted a “Salary Authorization Form” with your application to validate salary expenditures.

- ✓ Applicants must submit all grant-funded salaries for CJCC’s approval. CJCC will also determine the reasonableness of requested salaries and reserves the right to limit the grant-financed portion of any salary.
- ✓ Subgrantees may use grant funds for overtime pay, provided that the payment of overtime is allowable under the applicant agency’s policy. “Overtime pay” is remuneration for hours worked on a subgrant program in excess of full-time. “Fulltime” is at least thirty-five (35) hours per week for sworn law enforcement officers and forty (40) hours per week for non-sworn personnel.
- ✓ CJCC will not approve grant budget adjustment requests for reallocation of excess personnel funds created by a vacancy unless the subgrantee requests the reallocation **prior to sixty (60) days** before the grant expiration date. For VOCA subgrantees, final budget reallocations must be submitted by **August 1** for approval.
- ✓ Subgrantees may use grant funds to pay personnel leaving employment for accrued annual leave and/or accrued compensatory time if CJCC approves, and if such use is in accordance with the subgrantee’s personnel policy. The proportion of grant funds paid for accrued annual leave and accrued compensatory time may not exceed the proportion of funds used to pay the employee’s salary.
- ✓ Funds may now be used to pay for on-call hours.

***Fringe Benefits***

Fringe benefits should be based on actual known costs or an established formula. Fringe benefits are for the personnel listed in the “Personnel” budget category and **only for the percentage of time devoted to the project**. Fringe benefits on overtime hours are limited to FICA, Worker’s Compensation, and State Unemployment Compensation. Costs included in this category are FICA (employer’s portion of the Social Security and Medicare taxes), employer’s portion of retirement, employer’s portion of insurance (health, life, dental, etc.), and employer’s portion of Worker’s Compensation and State Unemployment Compensation. Each benefit for each position should be shown as a separate calculation/estimate.

**Example Personnel & Fringe Benefit Calculation:**

<b>1. Personnel</b>	
Suzy, Victim Advocate	
Gross: \$30,000 x 75%	\$22,500

## 2. Fringe Benefits

Suzy, Victim Advocate	
Suzy, Victim Advocate	
<i>FICA: (\$30,000 x 0.0765) x 75%</i>	\$1,721.25
<i>Health Ins.: (\$200/month x 75%) x 12</i>	\$1,800
<i>Pension: (\$30,000 x 0.02) x 75%</i>	\$450
<i>Dental/Vision: (\$100/month x 75%) x 12</i>	\$900
<b>TOTAL</b>	<b>\$4,871.25</b>

### Travel

Costs in this category are eligible if they comply with the statements in the following checklist:

- ✓ All travel expenditures must be in accordance with the most current [State of Georgia Statewide Travel Regulations](#) regardless of the applicant agency's travel policies. Three main provisions include:
  - Funding is authorized for travel within the program's service area only for mileage driven in personal vehicles for program/business purposes and may not exceed the [current state maximum](#), the amount the program specifies as the mileage reimbursement rate, *or* the lesser of the two;
  - Funding is not authorized for lodging within 50 miles of the subgrantees' place of business; and,
  - Funding is not authorized for meals within thirty (30) miles of the subgrantees' place of business, and when traveling outside a thirty-mile radius, the employee must be away for more than 13 hours.
- ✓ Out-of-state travel must be justified and in accordance with U.S. General Services Administration ([GSA per diem rates](#)).
- ✓ Use of unbudgeted grant funds for out-of-state travel requires CJCC's prior written approval and a sub-grant adjustment.
- ✓ Subgrantees must document program personnel's completion of grant-funded training and certification courses. Subgrantees must justify to CJCC in writing any non-completion of course requirements. Subgrantees may have to cover the cost of training if CJCC fails to approve the justification letter submitted.

### **Equipment**

Equipment is defined as any non-expendable personal property with a useful life of more than one (1) year and acquisition costs equal to or greater than \$5,000 per unit. Included in the definition of equipment are any other items a subgrantee chooses to capitalize in its own accounting records. Subgrantees may not apportion costs for equipment into smaller components to avoid the true acquisition costs.

A list of equipment purchases must be submitted to CJCC and subgrantees may request additional equipment through grant adjustments. CJCC will authorize equipment if the subgrantee demonstrates that it is necessary, essential to the successful operation of the grant projects and reasonable in cost.

Equipment purchased with grant funds is subject to the rules stated in [Appendix 5 “Asset \(Equipment\) Management”](#) processing procedures.

### **Supplies**

Expenditures in this category are eligible if they comply with the statements in the following checklist:

- ✓ Supplies and direct operating expenses are costs directly related to the daily operation of the subgrant program that are not included in any other budget category and have an acquisition cost of less than \$5,000 per unit. Examples of allowable costs include office supplies, shared costs of office equipment, paper, printing, postage, classroom instructional supplies and educational resource materials.
- ✓ Funds **may not** be used to promote a program through paid advertisements or promotion gifts without CJCC’s prior written approval. In the past, CJCC has allowed an **exception** for programs to use funds to pay for billboards to advertise a hotline or program services. Such a billboard must display the disclaimer language referenced above under “Printed Materials.” CJCC reserves the right to allow or disallow requests on a case by-case basis.
- ✓ CJCC will not approve the use of funds to purchase admission to any amusement park, recreational activity, or sporting event.
- ✓ Funds may be used to pay for gift cards for victims to purchase emergency items. All purchases must be accompanied by an itemized receipt for a reimbursement to be allowable; see [Appendix 11 “Sample Gift Card Policies and Procedures”](#).
- ✓ The State of Georgia’s Non-Employee Group Meals Policy and the [OJP Financial Guide](#) governs subgrantees’ use of grant funds for food, meals, beverages and related costs. This policy is included in the State Accounting Office’s [Statewide Travel Policy](#).

### **Printing**

Expenditures in this category are eligible if they comply with the statements in the following checklist:

- ✓ Business cards are allowable only for VOCA funded personnel.
- ✓ Program letterhead is an allowable expense.
- ✓ Costs for printing program-related materials are allowable.
- ✓ Brochures printed with grant funds must acknowledge the funding source with the following language:

"This project is supported by Award No. \_\_\_\_\_; awarded by the Office for Victims of Crime and administered by the Criminal Justice Coordinating Council. 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 for Victims of Crime, or the Criminal Justice Coordinating Council."

### **Other**

Expenditures in this category are eligible if they comply with the statements in the following checklist:

- ✓ Individual consultant rates may not exceed \$81.25/hour or \$650/day, but may include actual time for preparation, evaluation and travel in addition to the time for the presentation or service. Consultant transportation, hotel, and incidental costs are not included in this maximum amount and may be specified separately under the contract.
  - According to the DOJ financial guide, a **consultant** is "an individual who provides professional advice or services." CJCC **does not fund** the use of consultants for general organizational administration or strategic planning efforts. All "professional advice or services" **must be directly related** to the provision of victim services as defined in the [VOCA Program Guidelines](#).
  - Rates above the established maximum threshold rate will be reviewed on a case-by-case basis. Justification for exceeding the established maximum rate may include where a rate is established through a competitive bidding process.
  - Subgrantees requesting consultant expenses on their grant must be able to justify the rate they are requesting either using the provider's billing history for a similar service or using local market rates. For example, a subgrantee requesting a contract licensed therapist expense may use the therapists' hourly billing rate with similar clients and submit invoices verifying this rate to justify the amount requested on the grant.
  - Consultants who are state or local government employees or are personnel at another CJCC-funded nonprofit or nongovernmental agency must show that the time they are spending on the grant is separate from the time CJCC is funding for work at their respective agency.

- See [Appendix 7](#) for a sample consultant contract.
- For-profit corporation or nonprofit consulting services must be determined through competitive bidding.
- Agencies may not request accounting, auditing, or bookkeeping services furnished through an independently-employed individual, unless the agency expends more than \$750,000 in federal funds during its fiscal year. Reimbursement for these services must be pro-rated across all federal funding services.
- Costs for office rent and utilities are allowable if they are justified and if the agency provides a statement of comparable rates in the area. These costs will be pro-rated for grant-funded staff. Liability costs (such as malpractice insurance) are similarly allowable under these conditions. Subgrantees seeking to recover rent costs must furnish a copy of their lease agreement.

### Indirect Cost

Indirect cost are costs not readily and easily assignable to a particular award or program but are necessary both to the operation of the subgrantee and to the performance of the award. Common examples include building maintenance, telephone expenses, general supplies, and salaries and benefits of certain employees whose work benefits the entire organization.

*The following are the four options available to recover costs expended in the process of managing your federal VOCA award:*

1. Charge costs directly (Direct Charge) as long as those costs are charged the same consistently across all federal awards. The salaries of administrative and clerical staff should normally be treated as indirect costs unless:
  - Services are integral to a project or activity,
  - Individuals involved can be specifically identified with the project or activity,
  - Costs are explicitly included in budget or have the prior written approval of CJCC, and/or
  - The costs are not also recovered as indirect costs.
2. Apply for a federally negotiated indirect cost rate from your cognizant agency.
  - The federal cognizant agency is typically the federal agency with the largest direct dollar value of federal awards.
3. Use a negotiated indirect cost rate with CJCC (in compliance with 2 CFR Part 200)
  - Only if your organization does not receive a direct federal award.
4. Elect to use a flat de minimis rate of 10% of modified total direct costs (MTDC).
  - Only non-federal agencies which have **never** held a negotiated rate are eligible to elect the de minimis rate of 10% of modified total direct costs.



- State or Local Governments receiving over \$35M in direct federal funding are not eligible to elect the 10% de minimis rate of MTDC. (2 CFR §200 Appendix VII D(1)b1)
- Must be used **consistently across all federal awards** (unless there is a statutory exception)

MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first \$25,000 of each subaward or subcontract (regardless of the period of performance of the subawards and subcontracts under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward and subcontract in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs and with the approval of the cognizant agency for indirect costs.

Included in MTDC Calculation	Excluded from MTDC Calculation
Salaries and Wages	Equipment
Fringe Benefits	Capital Expenditures
Materials and Supplies	Charges for Patient Care
Services	Rental Costs
Travel	Tuition Remission
First \$25,000 of each subaward and subcontract	Scholarships and Fellowships
	Participant Support Costs
	Portion of each subaward and subcontract over \$25,000

## Subgrant Expenditure Requests

A subgrantee may submit a request for reimbursement on either a quarterly or monthly basis. Below are the due dates for either quarterly or monthly subgrant expenditure reports. CJCC staff do their best to approve and submit all Subgrant Expenditure Requests (SERs) for payment within 7 days of receipt. This turn-around time strongly depends on whether the subgrantee has provided all the necessary documentation with their SER and is current with their programmatic reports. **Late programmatic reports or incomplete documentation will delay SER processing.**

Month	Reporting Month	Due Date	Quarter	Reporting Period	Due Date
Month 1	October	November 15 <sup>th</sup>	Quarter 1	October – December	January 30
Month 2	November	December 15 <sup>th</sup>	Quarter 2	January – March	April 30
Month 3	December	January 15 <sup>th</sup>	Quarter 3	April – June	July 30
Month 4	January	February 15 <sup>th</sup>	Quarter 4	July – September	October 30
Month 5	February	March 15 <sup>th</sup>			
Month 6	March	April 15 <sup>th</sup>			
Month 7	April	May 15 <sup>th</sup>			
Month 8	May	June 15 <sup>th</sup>			
Month 9	June	July 15 <sup>th</sup>			
Month 10	July	August 15 <sup>th</sup>			
Month 11	August	September 15 <sup>th</sup>			
Month 12	September	October 15 <sup>th</sup>			

For SERs the following is required:

- ✓ Completion and submission of quarterly/bi-annually reports on time (VSSR, OPM, etc.). Funding will be “frozen” if these reports are not submitted.
- ✓ *Monthly expenditure report submissions are due within 15 days of the close of the previous month.*
- ✓ *Quarterly expenditure report submissions are due within 30 days of the close of the previous quarter.*
- ✓ Completion of a Vendor Management form **IF** there is a change in bank account information, including closed/new accounts, checking information, account information, bank name, etc. (If there has been a change and this form has not been submitted, it will delay a reimbursement).
- ✓ Signed Volunteer Contracts for current award year, if applicable. *Volunteer Contracts are only valid for 1 grant year.*
- ✓ Signed Volunteer Monthly Record/Timesheet, if applicable.

## Subgrant Adjustment Requests

Subgrantees must use subgrant adjustment requests (SARs) to alert their auditor/examiner or grant specialist about any substantive changes related to their grants. A SAR form, which was included in the subgrantees award packet, must be completed and returned along with a detailed budget. The assigned grant specialist will email a new SAR form each time they process a previous SAR. Like SER forms, this file **cannot** be downloaded from the website and can only be obtained through the assigned grant specialist.

**SARs should be submitted to alert CJCC about any of the following changes to your grant:**

- ✓ A change in the Authorized Signature for the grant;
- ✓ A change in the contact information for the agency point of contact
- ✓ Changes in budget allocations
  - All changes to budget allocations must be pertinent to the original project scope. If the budget reallocation request results in a substantial change in your program's scope, it may be disallowed. For example, if you have experienced turnover in personnel and would like to move money from personnel to equipment to purchase a new computer or software system, CJCC may question your request for additional computers, given that you have fewer personnel.
- ✓ All budget allocation changes must be submitted **sixty (60) days prior** to the grant period end (i.e. by August 1 for most VOCA grants). Any SARs requesting changes to budget allocations received after the 60<sup>th</sup> day **will not** be approved. **NOTE:** All budget reallocation SARs must be submitted prior to the last sixty (60) days of the grant period and all expenses included in an SAR must be **anticipated** expenses to be incurred within those last 60 days. CJCC **will not** reimburse subgrantees for unapproved expenses incurred prior to the submission of this final budget reallocation SAR.
- ✓ Changes in program scope or activities.
- ✓ Adjustments should be made within 14 business days after the change.

**NOTE:** When possible, all SARs (except for final budget reallocations) should be submitted for any change **prior** to that change taking effect. If you know that a staff member is leaving the organization or that the grant point of contact will change, please alert CJCC prior to this change so that staff can ensure the new point of contact receives proper technical assistance to manage your VOCA grant.

## Programmatic Reporting Requirements

Programmatic reporting is an important component to grants management. Reports help agencies collect vital information from their clients, track program performance, and enhance service delivery. Submitting the data to pass-through agencies, such as the CJCC, helps funders monitor the use of federal funds, assess subgrantee progress, and identify areas for growth. Collecting and reporting your agency's data is not only a federal requirement, but is also crucial in making the case for continued and increased funding for victim assistance programs in the state of Georgia.

CJCC requires that subgrantees comply with, and fully participate in, the financial, programmatic, and evaluation reporting for this grant program as well as the main components of evaluation and program reporting. CJCC staff provide training and technical assistance to assist subgrantees in accurate data collection and reporting. Assistance may be requested by contacting your assigned grant specialist.

Once your agency has been notified of its subgrant award, you should begin tracking financial expenditures and program activities to fulfill CJCC programmatic reporting requirements per your special conditions. CJCC requires two programmatic reports from VOCA subgrantees, specifically the quarterly Victim Services Statistical Report (VSSR) and the annual Outcome Performance Measurements (OPM) Report.



### Victim Services Statistical Report

VOCA subgrantees are required to complete the VSSR on a quarterly basis. Each quarter, the Statistical Analysis Center (SAC) Analyst re-activates the online reporting survey. The SAC Analyst then identifies the list of open grants and project directors, to whom the VSSR link is emailed. The email will be sent at the beginning of the reporting period, at which time subgrantees may log in with their permanent username and password to input data. Please note that permanent login credentials are assigned to newly awarded subgrantees during their first reporting period.

The SAC Analyst emails the VSSR link to project directors and designated reporting staff **20 days** prior to each reporting deadline. Remember, it is **very important** that you complete a SAR to update the project director's name and/or their contact information to ensure timely receipt of VSSR information. CJCC will not send reporting information to anyone other than the project director or reporting staff, unless otherwise requested.

Dates for submitting your VSSR are as follows. Please be sure to add these to your agency's calendar, especially if the project director delegates completion of VSSRs to a staff member:

Quarter	Reporting Period	Due Date
Quarter 1	October 1 - December 31	January 20
Quarter 2	January 1 - March 31	April 20

Quarter 3	April 1 - June 30	July 20
Quarter 4	July 1 - September 30	October 20

The web-based tool has built-in validation capabilities, therefore subgrantees should be sure that their demographic data aligns with the number of victims they report serving in each category. Additionally, subgrantees should also ensure that the **service units they report are equal to or greater than the number of victims** they report serving. Incorrect or inaccurate data will not be accepted in the web-based system and the subgrantee **will not be able to submit** their VSSR on this platform until all the data are correct.

Agencies should only report agency-wide data on all victims who were provided with direct services, **regardless of funding source and program type** (if your agency has multiple victim service programs). CJCC will then prorate the data on the agency’s behalf. To do this, agencies will need to report the percentage of their awarded grant(s) relative to their agency’s victim services budget. The grant award percentages collected on the VSSR include VOCA, VAWA, SASP, State Domestic Violence, State Sexual Assault, FVPSA, and 5% grant funds.

Example:

Let’s say your agency was awarded \$25,000 from VOCA, \$25,000 from VAWA, and \$50,000 from United Way and general donation funds for an overall victim services budget of \$100,000. Your agency has both a domestic violence program and a sexual assault center. When reporting, you will submit data for both programs in one report, and you will input 25% as the grant percentage for your VOCA award and 25% as the grant percentage for your VAWA award.

For more information about accurately reporting your victim services statistics, consult the VSSR Guide, or contact the SAC Analyst for victim assistance grants.

**Outcome Performance Measures**

Subgrantees funded to provide direct victim services to clients who are victims of crime, and whose contact with clients is more extensive than a single telephone call or other distribution of information (hotlines), are required to submit an annual Outcome Performance Measure (OPM) report. Primarily, this will include sexual assault programs, domestic and family violence programs, child advocacy and CASA programs, counseling and treatment programs, legal services, and various forms of victim assistance whether based in law enforcement, prosecution, or other settings.

Agencies with Activities Partially Funded: Agencies that receive funding from CJCC for a separately staffed, self-contained program, and in which those clients do not receive any other victims’ services from the agency or from any other staff, may choose to collect outcome data only on those clients. However, agencies are encouraged to collect outcome data on all clients and report them to CJCC.

Single positions funded by CJCC: Agencies that receive funding from CJCC that support one staff member out of several, and in which clients may receive services from all staff at any time, must collect data from all clients served. First, the outcome of your program on clients is produced by the cumulative effect of all services received and all contacts experienced, and it is methodologically impossible to separate out the impact of one staff person from among the many. Second, even if each staff member sees their own group of clients, it creates an extra burden for that staff member and may give that staff member's clients the impression that they are being singled out for some reason. Third, the agency misses out on the opportunity to learn what impact the program is having on all its clients.

CJCC has provided survey instruments for subgrantees to distribute to clients who have **completed or substantially completed services**, as determined by the design of your program and defined by your agency. You will select the survey that is most applicable to the clients you serve. If you have questions about which survey is most applicable, contact your grants specialist. **Do not modify or delete any of the survey questions!** However, you are encouraged to "customize" the layouts of the surveys you use to make them fit your program's identity. For example, you may change the fonts, colors, and insert your logo and agency name (or print the survey forms on agency letterhead). You are permitted to include additional measures if your program wants to gather MORE than what is required by CJCC.

Surveys should be given to all clients, **regardless of funding**. OPM surveys are available at CJCC's website on the [VOCA Reporting page](#). The surveys include:

1. Adult Victim Counseling
2. Court Appointed Special Advocates
3. Domestic Violence Shelter
4. Family/Child Counseling
5. Legal Advocate
6. Legal Services
7. Law Enforcement Victim Witness Assistance Program
8. Prosecution Victim Witness Assistance Program
9. Sexual Assault Center
10. Child Advocacy Center/Sexual Assault Center

On the website, you will also find the OPM Guide, which provides in-depth information regarding this report, and Excel spreadsheets to help you tally your data.

Outcome performance measures are reported through CJCC's web-based reporting tool. The online reporting link to submit the report will be provided to the subgrantees at the beginning of the reporting period, at which time subgrantees may log in with their permanent usernames and passwords to input data. For most agencies, these logins will be the same used for the VSSR.

There will be no extensions to accommodate late report submissions, unless a waiver is requested.

OPM Reporting due date:

	Reporting Period	Due Date
Annual	October 1 – September 31	October 30

For more information about accurately reporting your outcome performance statistics, consult the OPM Guide, or contact the SAC Analyst for victim assistance grants.

**Overdue Programmatic Reports or Continuation Applications:**

Failure to submit any required reports by the deadline specified may significantly delay any and all SERs submitted relative to the grant period. Repeated or continued delays may result in a staff recommendation requesting a reduction to the overall grant award for noncompliant agencies.

## Compliance Monitoring Activities and Other Requirements

As part of its grant monitoring functions, CJCC is required to perform compliance monitoring activities of its subgrantees at least once every two (2) years. There are two types of compliance monitoring activities that CJCC conducts. Site visits give CJCC the opportunity to see all its subgrantees' important work up close, meet the program staff and tour the facility after reviewing all grant-related documents. Desk reviews occur when CJCC staff review all grant-related documents at CJCC and conduct conference calls with the agency's personnel. Generally, CJCC determines if an agency is due for a site visit or a desk review based on either on a risk assessment of subgrantee financial and programmatic viability, subgrantee requests for technical assistance, or a request from CJCC's governing Council.

CJCC staff will alert the subgrantee about an upcoming site visit or desk review at least 2 weeks prior to the visit. The subgrantee's executive director will receive an announcement letter and document preparation checklists that they must complete prior to the visit.

### Record Retention Requirements

Below is a list of record-keeping requirements that will make your site visit a success and keep your agency in compliance with the guidelines in the federal circulars cited above.

- ✓ Maintain all records related to a subgrant for 3 years after the grant is closed. The clock for record-keeping for a particular grant starts from the date of notification that the grant has been closed fiscally and programmatically.
- ✓ Keep all receipts related to any supplies or equipment purchases made with grant funds.
- ✓ Maintain an inventory list of all equipment and the grant funds used to pay for each.
- ✓ Ensure you have timesheets for all grant-funded personnel during the grant period. Timesheets should capture the number of hours worked, the grant to which the hours are assigned, and the activities performed on the grant.
- ✓ Ensure you have policies and procedures that separate accounting duties within your organization.
- ✓ Ensure you have an Equal Employment Opportunity Plan with the Office of Civil Rights (if applicable) or have filed a federal [Certification Form](#). To determine if your agency is exempt, refer to Section "A" of this form or go to the OJP's Office of Civil Rights [website](#).
- ✓ Keep copies of invoices for contractors listed on the grant and a copy of the contract between your agency and the contractor.
- ✓ Ensure your accounting system can separate the expenses and revenue for each of your subgrants from other general expenses and revenue or those associated with other grants. See [Appendix 10](#) for more on Subrecipient Financial Management Requirements;
- ✓ Ensure you have non-discrimination policies for service provision and that these policies are made available to clients and employees.

CJCC staff will review all of these documents, your accounting system, your personnel policies and procedures, and a random selection of receipts and other documentation during the site visit or desk review. Staff will also address any programmatic reporting or other issues with



which your agency may need technical assistance. For more information and helpful resources, please see the [Compliance Monitoring](#) page at [cjcc.georgia.gov](http://cjcc.georgia.gov).

### Non-Discrimination in Service Provision

As recipients of federal funds, all subgrantees are subject to the following federal nondiscrimination laws:

- ✓ Title VI of the Civil Rights Act of 1964 - 42 U.S.C § 2000d,
- ✓ Section 504 of the Rehabilitation Act of 1973 - 29 U.S.C § 794,
- ✓ The Omnibus Crime Control and Safe Streets Act of 1968 - 42 U.S.C. § 3789d(c)(1),
- ✓ Title II of the Americans with Disabilities Act - 42 U.S.C. § 12132,
- ✓ Title IX of the Education Amendments of 1972 - 20 U.S.C § 1681 (applicable to all subgrantees that conduct training),
- ✓ The Age Discrimination Act of 1975 - 42 U.S.C § 6101, and
- ✓ Equal Treatment for Faith-Based Organizations - 28 C.F.R. Part 38 (prohibits discrimination based on religious affiliation during service delivery).

Information about these laws can be found on the DOJ's Office of Civil Rights [website](#). Generally, to be compliant with these laws, subgrantees may not discriminate on the basis of sex, national origin, immigration status, religion, race, color, disability status, or age when providing services. Clients who feel they have been discriminated against may file a complaint with CJCC or the Office of Civil Rights. If a finding of discrimination is made against your agency, you must file these findings with the Office of Civil Rights and send a copy to CJCC.

To ensure your agency is providing the best possible services to all persons in your community, you should have a nondiscrimination policy for service provision. Disseminate the policy widely amongst your employees and clients seeking your services. An easy way to ensure all victims you serve are made aware of this policy is to include the language below in any publications or brochure about your agency that you distribute:

*"The \_\_\_\_\_ Program does not discriminate against individuals or groups on the basis of race, color, national origin, religion, sex, immigration status, or disability. If you believe you have been the target of discrimination, you have the right to file a civil rights complaint. Information on how to file a civil rights complaint can be found on the Office of Justice Programs website: <http://www.ojp.usdoj.gov/about/ocr/complaint.htm>. Adverse findings must also be sent to the Criminal Justice Coordinating Council by calling 404-657-1956 or mailing the finding to 104 Marietta St NW, Suite 440, Atlanta, GA 30303."*

Finally, all subgrantees must be prepared to make reasonable accommodations for persons seeking services who are either limited English proficient or disabled to be compliant with the above nondiscrimination laws. For information and resources for providing services to LEP or disabled individuals, visit [LEP.gov](http://LEP.gov) or Georgia's [Americans with Disabilities Act Coordinator's Office](#). You may also contact CJCC for technical assistance with questions or concerns.

## Technical Assistance Resources

CJCC staff is committed to providing all subgrantees the best subject matter and financial technical assistance possible. You can request tailored Training and Technical Assistance by reaching out to your assigned specialist. Staff will contact your agency to schedule a conference call or in-person session to meet your agency's specific needs.

For technical assistance related to programmatic or fiscal reports please request your grants specialist or planner by calling CJCC at (404) 657-1956.

Below are some websites subgrantees may find useful to the programmatic or fiscal management of their VOCA grant.<sup>1</sup>

### Georgia-Specific Technical Assistance Providers:

- Child Advocacy Centers of Georgia ([CACGA](#))
- Georgia Coalition Against Domestic Violence ([GCADV](#))
- Georgia Commission on Family Violence ([GCFV](#))
- Georgia Court Appointed Special Advocates ([GACASA](#))
- Georgia Network to End Sexual Assault ([GNESA](#))
- Prosecuting Attorney's Council of Georgia ([PAC](#))

### National Technical Assistance Resources

#### *Fiscal Grant Management:*

- OJP [Grants Financial Guide](#)
- DOJ [Grants Financial Guide](#)
- Federal Accounting Standards Advisory Board [Generally Accepted Accounting Principles](#)

#### *National Best Practices and Technical Assistance Websites:*

- OVC, Training and Technical Assistance Center ([OVCTTAC](#))
- National Center for Victims of Crime ([NCVC](#))
- [National Children's Alliance](#)
- National Coalition Against Domestic Violence ([NCADV](#))
- National Network to End Domestic Violence ([NNEDV](#))
- National Sexual Violence Resource Center ([NSRVC](#))
- [National Stalking Resource Center](#)
- Rape, Abuse, Incest, National Network ([RAINN](#))
- [Identity Theft Resource Center](#)

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<sup>1</sup> **NOTE:** The opinions or facts expressed in these websites do not represent those of CJCC or its staff.

## Appendix

- [APPENDIX 1: Allowable Direct Service Costs](#)
- [APPENDIX 2: Allowable Costs for Activities Supporting Direct Services](#)
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## APPENDIX 1: Allowable Direct Service Costs

Direct services for which VOCA funds may be used include, but are not limited to, the following:

- (a) Immediate emotional, psychological, and physical health and safety services that respond to immediate needs, other than medical care except as allowed under paragraph (a)(9) of this section, of crime victims, including:
  - (1) Crisis intervention;
  - (2) Accompanying victims to hospitals for medical examinations;
  - (3) Hotline counseling;
  - (4) Safety planning;
  - (5) Emergency food, shelter, clothing, and transportation;
  - (6) Short-term (up to 45 days) in-home care and supervision services for children and adults who remain in their own homes when the offender/caregiver is removed;
  - (7) Short-term (up to 45 days) nursing home, adult foster care, or group home placement for adults for whom no other safe, short-term residence is available;
  - (8) Window, door, or lock replacement or repair, and other repairs necessary to ensure a victim's safety;
  - (9) Costs of prescription/nonprescription medicine; durable medical equipment such as wheelchairs, crutches, hearing aids, eyeglasses, etc.; and other healthcare items on an emergency basis. Note: This would only be necessary if the state's compensation program, the victim's (or the victim's parents/guardians in the case of a minor) health insurance plan, Medicaid, or other health care funding source is not reasonably expected to be available quickly enough to meet the emergency needs of a victim.
  - (10) Emergency legal assistance, such as filing for restraining or protective orders, and obtaining emergency custody orders and visitation rights;
- (b) Personal advocacy and emotional support, including, but not limited to:
  - (1) Working with a victim to assess the impact of the crime,
  - (2) Identification of victim's needs,
  - (3) Case management,
  - (4) Management of practical problems created by the victimization,
  - (5) Identification of resources available to the victim,
  - (6) Provision of information, referrals, advocacy, and follow-up contact for continued services, as needed, or

- (7) Traditional, cultural, and/or alternative therapy/healing (e.g., art therapy, yoga)  
(Please note: Agencies will not be funded to solely provide services under this item as existing victim service providers may offer these services via contract or by other means);
- (c) Mental health counseling and care such as outpatient therapy/counseling, which could include substance abuse treatment so long as the treatment is directly related to the victimization, provided by a person who meets professional standards to provide these services in the jurisdiction in which the care is administered;
- (d) Peer-support including, but not limited to, activities that provide opportunities for victims to meet other victims, share experiences, and provide self-help, information, and emotional support;
- (e) Facilitation of participation in criminal justice and other public proceedings, including providing services and covering costs, that allow victims to participate in the criminal justice system and other proceedings arising from the crime. These services may include,
  - (1) Advocacy on behalf of a victim;
  - (2) Accompanying a victim to offices and court;
  - (3) Transportation, meals, and lodging to allow a victim who is not a witness to participate in a proceeding;
  - (4) Interpreting for a non-witness victim who is deaf or hard of hearing, or with limited English proficiency;
  - (5) Providing child care and respite care to enable a victim who is a caregiver to attend activities related to the proceeding;
  - (6) Notification to victims regarding key proceeding dates (e.g., trial dates, case disposition, incarceration, and parole hearings);
  - (7) Assistance with Victim Impact Statements;
  - (8) Assistance in recovering property that was retained as evidence; or
  - (9) Assistance with restitution advocacy on behalf of crime victims;
- (f) Legal assistance services including those provided on an emergency basis where reasonable and where the need for such services arises as a direct result of the victimization. Such services include, but are not limited to:
  - (1) Those services, other than criminal defense, that help victims assert their rights as victims in a criminal proceeding directly related to the victimization, or otherwise protect their safety, privacy, or other interests as victims in such a proceeding; or

- (2) Those actions (other than tort actions) that, in the civil context, are reasonably necessary as a direct result of the victimization;
- (g) Transportation of victims to receive services and to participate in criminal justice proceedings;
  - (h) Public awareness and education presentations including, but not limited to, the development of presentation materials, brochures, newspaper notices, and public service announcements in schools, community centers, and other public forums that are designed to inform crime victims of specific rights and services and provide them with, or refer them to, services and assistance;
  - (i) Transitional housing for those who have a particular need for such housing and who cannot safely return to their previous housing, due to the circumstances of their victimization. Subject to any restrictions on amount, length of time, and eligible crimes set by the SAA, transitional housing assists with travel, rental assistance, security deposits, utilities, and other costs incidental to the relocation to such housing, as well as voluntary support services such as childcare and counseling;
  - (j) Relocation of victims where necessary for the safety and well-being of a victim. Subject to any restrictions on amount, length of time, and eligible crimes, set by the SAA, relocation assistance includes covering reasonable moving expenses, security deposits on housing, rental expenses, and utility startup costs.

## APPENDIX 2: Allowable Costs for Activities Supporting Direct Services

Supporting activities for which VOCA funds may be used include, but are not limited to, the following:

- (a) Coordination of activities that facilitate the provision of direct services such as Statewide coordination of victim notification systems, crisis response teams, multidisciplinary teams, coalitions to support and assist victims, and other such programs, as well as salaries and expenses of such coordinators (Please note: due to the eligibility requirements of the VOCA Assistance Grant Program, this item is not intended to allow the funding of statewide coalitions that do not provide direct services);
- (b) Supervision of direct service providers—Payment of salaries and expenses of supervisory staff in a project, when the SAA determines that such staff are necessary and effectively facilitate the provision of direct services;
- (c) Multisystem, interagency, multidisciplinary response to crime victim needs—Activities that support a coordinated and comprehensive response to crime victims needs by direct service providers, including, but not limited to, payment of salaries and expenses of direct service staff serving on child and adult abuse multidisciplinary investigation and treatment teams; coordination with federal agencies to provide services to victims of federal crimes; and/or participation on statewide or other task forces, work groups, and committees to develop protocols, interagency, and other working agreements;
- (d) Contracts for professional services—Contracting for specialized professional services (e.g., psychological/psychiatric consultation, legal services, interpreters), at a rate not to exceed a reasonable market rate, that are not available within the organization;
- (e) Automated systems and technology—The procurement of automated systems and technology, such as automated information and referral systems, email systems that allow communications among victim service providers, automated case-tracking and management systems, smartphones, computer equipment, and victim notification systems, that support the delivery of direct services to victims. This includes the procurement of personnel, hardware, and other items subject to the provisions of the DOJ Grants Financial Guide and governmentwide grant rules relating to acquisition, use, and disposition of property purchased with federal funds and as determined by the SAA after considering the following:
  - (1) Whether such procurement will enhance direct services,
  - (2) How any acquisition will be integrated into and/or enhance the program's current system,
  - (3) The cost of installation,

- (4) The cost of training staff to use the automated systems and technology,
  - (5) The ongoing operational costs, such as maintenance agreements or supplies, and
  - (6) How additional costs relating to any acquisition will be supported (Please note: In an effort to avoid duplication and coordinate large scale technology projects, please contact CJCC if you are considering applying for funds to address automated systems and technology);
- (f) Activities in support of training volunteers on how to provide direct services when such services will be provided primarily by volunteers.



## APPENDIX 3: Allowable Administrative Costs

Administrative costs for which VOCA funds may be used by subgrantees include, but are not limited to, the following:

- (a) Personnel costs that are directly related to providing direct services and supporting activities, such as staff and coordinator salaries expenses (including fringe benefits), and a prorated share of liability insurance;
- (b) Training exclusively for developing the skills of direct service providers, including paid staff and volunteers (both VOCA-funded and not), so that they are better able to offer quality direct services, including, but not limited to, manuals, books, videoconferencing, electronic training resources, and other materials and resources relating to such training;
- (c) Training-related travel costs such as in-State, regional, and national travel; meals; lodging; and registration fees for paid direct service staff (both VOCA-funded and not);
- (d) Organizational expenses that are necessary and essential to providing direct services and other allowable victim services. These may include the prorated costs of rent, utilities, local travel expenses for service providers, required minor building adaptations necessary to meet the DOJ standards implementing the Americans with Disabilities Act, and/or minor modifications that would improve the program's ability to provide services to victims. Note: construction costs are generally not allowed. Please contact CJCC if you are considering applying for funds for any type of building adaptations or modifications;
- (e) Expenses of procuring furniture and equipment that facilitate the delivery of direct services, such as mobile communication devices; telephones; braille and TTY/TDD equipment; computers and printers; beepers; video cameras and recorders for documenting and reviewing interviews with children; two-way mirrors; colposcopes; digital cameras; and equipment and furniture for shelters, work spaces, victim waiting rooms, and children's play areas. The VOCA grant may be charged only the prorated share of an item that is not used exclusively for victim-related activities;
- (f) Operating costs include but are not limited to—
  - (1) Supplies,
  - (2) Equipment use fees,
  - (3) Property insurance,
  - (4) Printing, photocopying, and postage,
  - (5) Courier service,
  - (6) Brochures that describe available services,
  - (7) Books and other victim-related materials,
  - (8) Computer backup files/tapes and storage,
  - (9) Security systems,
  - (10) Design and maintenance of Web sites and social media, or
  - (11) Essential communication services, such as web hosts and mobile device services.

- (g) Costs of VOCA administrative time spent performing the following:
  - (1) Completing VOCA-required time and attendance sheets and programmatic documentation, reports, and statistics,
  - (2) Collecting and maintaining crime victims' records,
  - (3) Conducting victim satisfaction surveys and needs assessments to improve victim services delivery in the project, and
  - (4) Funding the prorated share of required audit costs (A-133 Audit).
  
- (h) Costs of leasing or purchasing vehicles, as determined by the SAA after considering, at a minimum, if the vehicle is essential to the provision of direct services;
  
- (i) Costs of maintenance, repair, and replacement of items that contribute to maintenance of a healthy or safe environment for crime victims (such as a furnace in a shelter and routine maintenance, repair costs, and automobile insurance for leased vehicles), as determined by the SAA after considering, at a minimum, if other sources of funding are available;
  
- (j) Costs of evaluations of specific projects (in order to determine effectiveness), within the limits set by SAAs (Please note: contact CJCC for prior approval).

## APPENDIX 4: Expressly Unallowable Costs

Per State of Georgia discretion and notwithstanding any other provision of this subpart, no VOCA funds may be used to fund or support the following:

- (a) **Lobbying or advocacy activities** with respect to legislation or to administrative changes to regulations or administrative policy (cf. 18 U.S.C. 1913), whether conducted directly or indirectly;
- (b) **Research and studies**, except for project evaluation under § 94.121(j);
- (c) **The active investigation and prosecution of criminal activity**, except for the provision of victim assistance services (e.g., emotional support, advocacy, and legal services) to crime victims, under § 94.119, during such investigation and prosecution;
- (d) Any **fundraising-related activities**, except for fee-based, or similar, program income authorized by the SAA under this subpart;
- (e) **Capital expenses** including improvements, property losses and expenses, real estate purchases, mortgage payments, and construction (except as specifically allowed elsewhere in this subpart);
- (f) **Compensation for victims of crime** including the reimbursement of crime victims for expenses incurred as a result of a crime, except as otherwise allowed by other provisions of this subpart;
- (g) **Medical care**, except as otherwise allowed by other provisions of this subpart;
- (h) **Salaries and expenses of management** including benefits, fees, furniture, equipment, and other expenses of executive directors, board members, and other administrators (except as specifically allowed elsewhere in this subpart).
- (i) **Items otherwise reimbursable under the Georgia Victims Compensation Program.**

## APPENDIX 5: Asset (Equipment) Management

### General Principles for Property Acquisition and Management

Federal guidelines require subgrantees of federal funds to use good judgment when purchasing, managing, and disposing of property paid for by federal funds. If a subgrantee uses award funds to purchase equipment when suitable equipment is already available within the organization, this use will be considered an unnecessary expense.

**Subgrantees** may use their own agency's capitalization policies and procedures for the classification of equipment and supplies, but only where it is less than the Federal policy threshold of \$5,000.

**Equipment** means tangible property, including information technology systems, having a useful life of more than one year **and** a per-unit acquisition cost of \$5,000 or greater (or the organization's capitalization policy, if it is less than \$5,000). If the organization does not have a capitalization policy in place, the federal policy amount of \$5,000 must be followed.

**Supplies** are all other items of tangible personal property that are not equipment. This includes computing devices that cost less than \$5,000 per unit (or the organization's capitalization threshold, if that is less than \$5,000).

### Screening and Property Management Systems

Careful screening should take place before purchasing equipment to ensure that it is needed. Organizations should establish and maintain an effective equipment management system to avoid incurring equipment acquisition costs that are later disallowed by the awarding agency (e.g., acquiring unreasonable, duplicative, or unnecessary equipment). Recommended screening practices include:

- Taking stock of the equipment that the subgrantee already has and see if it meets the identified needs,
- Considering establishing a screening committee to make decisions about purchases,
- Utilizing effective management techniques as a basis for determining that equipment is needed, and
- Initiating a screening process to ensure that effective controls are in place for equipment management.

### Equipment Ownership, Use, Management, and Disposition

VOCA subgrantees must follow the standards and procedures for ownership (title), use, management, and disposition of equipment set out below:

#### Ownership of Equipment

Title to equipment acquired under the VOCA subaward will vest in the subgrantee's organization. The legal right of ownership and conditions for use, management, and disposal of equipment are set forth in [2 C.F.R. §200.313](#) and are described below.

### Use of Equipment

*VOCA subgrantees* must use the equipment acquired for the authorized VOCA program or project purposes for which it was acquired as long as needed, whether or not the project or program continues to be supported by federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a federal agency.

- ***Use for other federal projects.*** Equipment must be made available for use on other projects or programs currently or previously supported by the federal government, provided the use does not interfere with the work on the projects or programs for which it was originally acquired. First preference for other use should be given to other programs or projects supported by OVC.
- ***User fees.*** User fees should be considered and treated as program income to the project, when appropriate. See [2 C.F.R. § 200.307](#) (Program Income). During the time the federal government retains an interest in the equipment the non-federal entities must not use equipment acquired with a federal award to provide services for a fee that is less than private companies charge for equivalent services, unless doing so is specifically authorized by law. See [2 C.F.R. § 200.313\(c\)\(3\)](#).
- ***Replacement equipment.*** When acquiring replacement equipment, subgrantees may use the equipment to be replaced as a trade-in or may sell the equipment and use the proceeds to offset the cost of the replacement equipment, subject to the written approval of OVC.
- ***Encumbrances.*** A non-federal entity must not encumber equipment acquired under a federal award without approval of OVC or CJCC.

### Management of Equipment

*Subgrantees* must use procedures for managing equipment, including replacement equipment, acquired in whole or in part under the VOCA subaward until disposition takes place, that, at a minimum, meet the following requirements:

- ***Property records.*** Property records must be maintained to include all of the following information:
  - Description of the property;
  - Serial number or other identification number;
  - Source of the property, including the federal award identification number;
  - Identification of the title holder;
  - Acquisition date;
  - Cost of the property;
  - Percentage of federal participation in the cost of the property;
  - Location of the property;

- Use and condition of the property;
- Disposition data, including the date of disposal and sale price.
- **Inventory.** A physical inventory of the property must be taken, and the results must be reconciled with the property records at least once every 2 years.
- **Maintenance procedures.** Adequate maintenance procedures must be established and used to keep the property in good condition.
- **Control system.** A control system must be in place with adequate safeguards to prevent loss, damage, and theft.
  - Promptly and properly investigate and fully document any loss, damage, or theft, and make the documentation part of the official project records. [2 C.F.R. § 200.313 \(d\)\(3\)](#).
  - Provide, at a minimum, the equivalent insurance coverage for equipment acquired with federal funds that the non-federal entity owns. Federally-owned equipment need not be insured unless required by the award. [2.C.F.R. § 200.310](#).
  - Non-federal entities are responsible for replacing or repairing property that is willfully or negligently lost, stolen, damaged, or destroyed.
- **Proper sales procedures.** If authorized or required to sell the property, the recipient or subgrantee must establish proper sales procedures to ensure the highest possible return.

### Disposition of Equipment

*Subgrantees* must dispose of the equipment when the original or replacement equipment acquired under the VOCA subaward is no longer needed for the original project, or for other activities currently or previously supported, as follows:

- If the item to be disposed of has a current per-unit fair market value of \$5,000 or less, the item may be retained, sold, or otherwise disposed of with no further obligation to OVC.
- If the item has a current per-unit fair market value of more than \$5,000, the item may be retained or sold, but OVC will have a right to a specific dollar amount. Calculate this amount by multiplying the current market value or proceeds from the item sale by the OVC's share of the equipment (i.e, the agency's percentage of participation in the cost of the original purchase). The seller is also eligible for limited sale and handling costs of \$500 or 10% of the proceeds, whichever is less.
- In cases where the subrecipient fails to take appropriate disposition actions, OVC may direct other disposition actions.

Please use the documents below to assist you in your inventory management:

1. [Equipment Tracking/Inventory Log](#)
2. [Equipment Disposal & Missing/Stolen Report Form](#)

## APPENDIX 6: Sample Limited English Proficiency Policy

(Entity Name)  
Sample Policy to Make Services Accessible  
to Limited English Proficient Persons

### I. Legal Basis and Purpose

As recipients of federal funds from the Department of Justice, the (Entity Name) is subject to the following federal non-discrimination laws:

- ✓ Title VI of the Civil Rights Act of 1964 - 42 U.S.C § 2000d;
- ✓ Section 504 of the Rehabilitation Act of 1973 - 29 U.S.C §794;
- ✓ The Omnibus Crime Control and Safe Streets Act of 1968 - 42 U.S.C. § 3789d(c)(1);
- ✓ Title II of the Americans with Disabilities Act - 42 U.S.C. § 12132;
- ✓ Title IX of the Education Amendments of 1972 - 20 U.S.C § 1681 (applicable to all subgrantees that conduct training);
- ✓ The Age Discrimination Act of 1975 - 42 U.S.C § 6101; and,
- ✓ Equal Treatment for Faith-Based Organizations - 28 C.F.R. Part 38 (prohibits discrimination based on religious affiliation during service delivery).

Title VI, in particular, prohibits discrimination in service provision based on race, color, disability, sex, national origin, age and/or religion. In compliance with this non-discrimination law, and with the Americans with Disabilities Act, (Entity Name) sets forth the following policy to provide services to limited English proficient, deaf, or hard of hearing persons.

### II. Definitions

- a. **Primary Language:** an individual's native tongue or the language in which an individual most effectively communicates. (Entity Name) staff should not make assumptions about a person's native language and should ask a person seeking services or information the language in which they prefer to communicate.
- b. **Limited English Proficiency:** A limited English proficient (LEP) person is one whose primary language is not English, and/or who has limited ability to read, write, speak, or understand English. They may have sufficient proficiency to function in one context, but insufficient proficiency for other contexts.
- c. **Interpretation:** The act of listening to a communication in one language and orally converting that language into another language, while retaining the same meaning.
- d. **Translation:** The replacement of written text from one language into an equivalent written text in another language.
- e. **Bilingual:** The ability to use two languages proficiently.

### III. Procedures for Accessing Interpretation Services

- a. (Entity Name) will maintain an updated list of bilingual staff available to serve those seeking services. Staff will have access to this list to respond to any incoming calls. The list will include the language proficiencies and scheduled availability of permanent, temporary, volunteer, and intern staff members. Said list is appended to this policy.
- b. For any and all languages for which (Entity Name) staff, volunteers, or interns are unavailable to provide interpretation or services, the agency will contact a Certified Court Interpreter listed on the [Georgia Commission on Interpreters'](#) website. Additionally, for in person customers, (Entity Name) will post language identification cards so that persons with limited English proficiency can identify their language to ensure the proper interpreter is requested.
- c. If a person needs interpretation services over the phone in a language in which no staff, volunteers, or interns are proficient, (Entity Name), after courteously asking the caller to hold, will contact the AT&T language line at 800.752.6096. A (Entity Name) staff representative will be provided with the credit card information and procedures for obtaining the language line's services in the event a limited English proficient person calls.
- d. If a person is deaf or hard of hearing, (Entity Name) will use [Sign Language Interpreting Specialists, Inc.'s](#) services to provide access to services. Additionally (Entity Name) will have staff available and trained to respond to the TTY telephone equipment for incoming calls.
- e. (Entity Name) will publicize on its website and in all written materials that the agency does not discriminate based on limited English proficiency and that services are available regardless of language ability.

### IV. Translated Forms and Documents

(Name of documents and forms) are translated and available on (Entity Name) website in Spanish. (Entity Name) will conduct an analysis of commonly spoken languages to determine whether such forms should be translated into other languages and made available to the public.

### V. Complaint Procedures

#### Filing a Complaint

A person who believes they have been harassed or subject to discriminatory treatment within (Entity Name) because of race, color, national origin, sex, age, religion, or disability, or have been retaliated against for engaging in a protected activity, is urged to file a complaint through the Civil Rights Officer. The current Civil Rights Officer is (Staff Member Name), (123) 456-7890, [first.last@entityname.com](mailto:first.last@entityname.com). Generally, formal complaints must be filed with the Civil Rights Officer within 180 calendar days of the alleged act of discrimination. If the complaint is not filed on time, the complainant should provide the reason for the delay and request a waiver of this filing requirement. (Entity Name) will decide whether to grant the waiver. The complaint may be filed in a letter, in an email, in person, or over the phone. In anticipation of filing a complaint, an individual may find it beneficial to contact the Civil Rights Officer to obtain policy clarification, advice, or assistance.



## APPENDIX 7: Sample Consultant Contract

### CONSULTING AGREEMENT

This Consulting Agreement, effective [INSERT DATE] is between [PARTY X] and [PARTY Y].

1. **PURPOSE OF AGREEMENT.** This agreement shall cover consulting services to be performed by PARTY X for PARTY Y. PARTY X agrees to perform the following duties in fulfillment of this agreement:
  - a. INSERT PROJECT SCOPE.
2. **CONSULTING FEES AND EXPENSE REIMBURSEMENTS.** During the term of this agreement, PARTY Y shall pay PARTY X a consulting fee of \$X per hour. In addition to the consulting fee, PARTY Y shall reimburse PARTY X for all reasonable out-of-pocket expenses incurred in performing the services for PARTY Y. PARTY X shall submit invoices for services performed and expense reports as expenses and fees are incurred, and at a minimum of twice a month. All expense reimbursements will be in compliance with the [INSERT] guidelines.
3. **TERM.** This agreement will take effect on [INSERT DATE] and continue through [INSERT DATE]. This agreement may be extended beyond the initial term only if agreed, in writing, by PARTY X and PARTY Y.
4. **GENERAL.** PARTY X shall perform the consulting services as an independent contractor and not as an employee, partner, joint venture, or principal of PARTY Y. This agreement may be modified or amended only as agreed upon, in writing, by both parties. This agreement contains the entire agreement between the parties and supersedes all prior or contemporaneous negotiations or agreements between the parties relating to the consulting services. This agreement is governed by [INSERT STATE] State law.

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**PARTY X**

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**PARTY Y**

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**Date**

---

**Date**

## APPENDIX 8: Sample Hire/Salary Authorization Letter

### COMPANY LETTERHEAD

Date

Applicant Name

Address

City, State, Zip

Phone

Email

Dear Mr. / Miss/ Mrs. /Ms. [NAME],

Congratulations! We are pleased to offer you a job with [COMPANY NAME]. The position offered is [JOB TITLE] at a salary of [SALARY]. The position of [JOB TITLE] is a full time position with fringe benefit. The company hours are [COMPANY HOURS]. We would like you to start work on [DATE]. If you are unavailable on that date, please contact us immediately. On [START DATE] please report to [NAME OF SUPERVISOR] for orientation.

We look forward to having you on our team and are confident you will make a significant contribution to [COMPANY NAME].

Sincerely,

[NAME OF PERSON OFFERING THE JOB]

[POSITION]

[COMPANY]

## APPENDIX 9: Sample Memorandum of Understanding Form

### MEMORANDUM OF UNDERSTANDING

*The XYZ, a state/local/nonprofit agency operating under the laws of the State of Georgia*

AND

*Individually listed partner agencies  
(hereinafter, "Partners" or named individually),*

*WHEREAS, XYZ and Partners all seek to ensure that the safety and needs of domestic violence are met through the courts and a coordinated community effort;*

*WHEREAS, XYZ and Partners all see a need to improve the functions of the civil and criminal court processes; and*

*WHEREAS, XYZ and Partners are committed to meaningful collaboration for system improvement, they enter into this agreement.*

*This Memorandum of Understanding shall be effective as of \_\_\_\_\_ and shall be active through the \_\_\_\_\_. The parties shall re-examine the extent of this memorandum and the roles of project partners at end of this period. [OPTIONAL: If funding for the activities described herein is not secured, this Memorandum of Understanding shall be considered void.]*

### **Partners**

*While all partners work and collaborate in some way through their work with each other, each Partner by the nature of their work only directly and regularly collaborates with certain others. These are noted.*

**Partner 1** is [enter brief description of partner 1 and role as Memorandum of Understanding (MOU) partner].

**Partner 2** is [enter brief description of partner 2 and role as MOU partner].

**Partner 3** is [enter brief description of partner 3 and role as MOU partner].

The local partners agree to work together and with XYZ to [describe nature of collaborative effort].

Each Partner agrees to provide the necessary time and staff resources to participate in this collaborative endeavor. In particular, these partners have specific duties:

- Partner 1 agrees to [specific duties/responsibilities here].
- Partner 2 agrees to [specific duties/responsibilities here].
- Partner 3 agrees to [specific duties/responsibilities here]

Each Partner will participate on the committee/partnership/collaborative or submit one designated, dedicated employee as such. All Partners will have representation to ensure that all aspects of service are covered, and no gaps exist.

By signing this Memorandum of Understanding, each Partner agrees to the commitment of fulfilling [insert collaborative's mission or purpose]. Each Partner agrees to contribute in-kind services and supplies through their agency or office to ensure the success and viability of the collaboration. Each partner has participated in outlining this memorandum of understanding and approves of the terms outlined therein.

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Partner 1 Signing Authority  
Title  
Address

---

Date

---

Partner 2 Signing Authority  
Title  
Address

---

Date

---

Partner 3 Signing Authority  
Title  
Address

---

Date

## APPENDIX 10: Subgrantee Financial Management Requirements

Subgrantees should have management processes and controls in place that reasonably ensure all of the following:

- Grant funded program(s) achieves the intended results.
- Resources are used in a manner consistent with the OVC's mission.
- Programs and resources are protected from waste, fraud, abuse, and mismanagement.
- Applicable laws and regulations are followed.

### *VOCA recipients must:*

- Establish and maintain effective internal control over the federal award that provides reasonable assurance that you are managing the federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.
- Comply with federal statutes, regulations, and the terms and conditions of the federal award.
- Take prompt action when instances of noncompliance are identified, including those identified in audit findings.
- Take reasonable measures to safeguard protected personally identifiable information and other information designated as sensitive, or considered sensitive, consistent with applicable federal, state, local, and tribal laws regarding privacy and obligations of confidentiality.

### **Internal Controls**

An adequate financial management system has strong internal controls. Internal controls include written policies and procedures that describe processes for planning, organizing, directing, controlling, and reporting on organizational operations. A system of internal controls should allow recipients and subgrantees to exercise effective control and accountability for all federal funds, real and personal property, and other assets.

The processes and procedures implemented by the organization should be designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- a) Effectiveness and efficiency of operations,
- b) Reliability of reporting for internal and external use, and
- c) Compliance with applicable laws and regulations.

### ***Separation of Duties***

Proper segregation, or separation of duties, is a critical element of adequate internal control. Organizations should break down those duties that might reasonably be completed by a single individual into multiple duties so that no one person is solely in control. Separation of duties is a key internal control concept that establishes procedures for certain types of financial transactions where

no one person is enabled to execute the entire procedure alone. The most commonly used example concerns initiating a payment (writing the check) and authorizing a payment (signing the check).

*\*If a subgrantee has limited staff, it must implement mitigating controls to help reduce the risks associated with inadequately segregating essential functions/duties. For example, an executive director may write a check and a designated board member may sign it.*

## Financial Management System

*To be an acceptable financial management system, the subrecipient's system must:*

- Maintain detailed and auditable records
- Track the funding from each award separately from other awards and other funding sources
- Document the following information:
  - Federal funds awarded
  - Federal funds drawn down
  - Matching funds (if applicable)
  - Program income (if applicable)
  - Procurement contracts expensed against the award
  - Expenditures

*An adequate financial management system supports the following:*

- Presents and classifies costs, as required for budgetary and evaluation purposes.
- Provides cost and property control to ensure optimal use of funds.
- Controls funds and resources to ensure conformance with general or special conditions.
- Meets requirements for periodic reporting, as specified in the award terms and conditions.
- Documents financial data for planning, control, measurement, and evaluation of both direct and indirect costs.

A subgrantee must also ensure that it has an adequate system of accounting and internal controls. Although the physical segregation of cash deposits may not be required under a federal award, the accounting systems of the subgrantee must ensure that federal award funds are not mixed or commingled with funds from other sources.

Award recipients and subgrantees are prohibited from commingling funds in their accounting systems from one program or project to another. Funds specifically budgeted and/or received for one award may not be used to support another award.

## APPENDIX 11: Sample Gift Card Purchase Policies & Procedures

### Allowable Gift Card Purchases

Gift card purchases are allowed if the card will be distributed for one of the following reasons:

- Provision of a need unable to be met by agency;
- Purchase of fuel to job search, seek housing, travel out-of-town for court or further case management plan, or travel to new out-of-town/state destination after exiting shelter. Other needs require approval from the program director.

### Prohibited

You are not allowed to purchase a gift card and then use the card to purchase products for your department or personal use.

### Gift Card Procedures:

- 1) Complete the Gift Card Purchase Request Form (see below) and obtain approval from the program manager, office manager, or the executive director.
- 2) The purchase must be accounted for in the general ledger ensuring to account for:
  - i. The actual amount spent,
  - ii. The balance remaining,
  - iii. The amount that was used for grant related services, and
  - iv. The amount that was not used for grant related services.
- 3) Client will complete, date, and sign Gift Card Agreement Form which must be placed in client's file.
- 4) When the cards are distributed you MUST complete the Distribution Form below to verify and account for all the cards that were distributed. The completed form should be attached to the purchase order along with any receipts.
- 5) When possible, the client will return the used card and any receipts showing purchases made to the staff person in charge of handing out the cards Clients traveling out-of-town/state will receive an agency self-addressed stamped envelope to return-mail receipt and card.
- 6) Used cards will be reloaded when funds are available.

### Control of Gift Cards

Gift cards should be kept under lock and key at all times to ensure proper physical security and to protect from theft and loss. Access to the gift cards and keys to the lock areas should be limited to the individual(s) responsible for safekeeping the gift cards.

Gift Card Purchase Request Form:

\_\_\_\_\_  
Requestor (Printed Name)

\_\_\_\_\_  
Department/Program

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

We would like to request the purchase of the Gift Cards as described below:

The gift cards will be used for:	
Number of cards needed:	
Supplier you want the gift card from:	
Value you want on each card:	
Date cards needed by:	
Fund Source to be charged:	
Date cards will be distributed:	
Party responsible for distribution of the cards:	

\_\_\_\_\_  
Approved By (Printed Name)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



Gift Card Distribution Log

Month/Year: \_\_\_\_\_

Gift Card Supplier	Amount	Recipient Printed Name	Recipient Signature	Date	PO #
	\$				
	\$				
	\$				
	\$				
	\$				
	\$				
	\$				
	\$				
	\$				
	\$				
	\$				
	\$				

***I attest that the above individuals received the gift cards listed.***

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

*(When completed, a copy must be attached to the Invoice as support documentation.)*