

Center for Crime Victim Services Grants Plan Guidelines



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VERMONT CENTER FOR CRIME VICTIM SERVICES

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GRANT PROGRAM DESCRIPTION

The Vermont Center for Crime Victim Services (CCVS) administers federal and state grant programs that are closely allied with its vision of joining with victims, survivors, and those who interact with victims and offenders to provide, sustain, and support a collaborative system of direct services across Vermont that is comprehensive, victim-centered, trauma-informed, and accessible to all diverse populations, and geographic regions in the state. Per Vermont legislation specifically related to the CCVS please see [13 V.S.A. §5361](#).

PRE-AWARD ELIGIBILITY DETERMINATION

The Center for Crime Victim Services (CCVS) will determine the eligibility for all sub-grantee grant awards, regardless of category, amount, or funding source prior to issuing awards. Prior to receiving an award, the Center for Crime Victim Services will screen sub-grantees for suspension or debarment and complete a risk assessment. Please refer to the [Monitoring Plan](#) section of this document for more detailed descriptions regarding the risk assessment. Also refer to [Bulletin 5](#) from the State of Vermont.

SUSPENSION OR DEBARMENT

A sub-grantee will be considered ineligible if any of the three following conditions exist:

Suspension and Debarment: In accordance with Finance & Management Policy #1, organizations that have been suspended or debarred by the Federal government are *ineligible* to receive new grant awards of any amount from the State of Vermont, regardless of funding source. To ensure that applicants have not been suspended or debarred the CCVS financial/grant staff will check the [State of Vermont's Buildings and General Services, Office of Purchasing and Contracting Debarment List](#) and [the United States Department of Labor, Office of Federal Contract Compliance Programs \(OFCCP\) list of debarred companies](#).

Subrecipient Annual Report: Organizations that are currently delinquent in submission of the Subrecipient Annual Report to F & M for any of the preceding three years are ineligible to receive new awards until the delinquent status has been resolved. The CCVS financial/Grant staff will run a VISION query to monitor the status of subrecipient Annual reports.

Single Audit Report-Organizations that are currently delinquent in the submission of a Single Audit report for any of the preceding three years, until the delinquent status has been resolved. The CCVS financial/grant staff will run a VISION query to monitor the status of single audits.

ANNUAL SUBRECIPIENT REPORT TO VERMONT DEPARTMENT OF FINANCE AND MANAGEMENT

CCVS will run a query in VISION to verify that subrecipients have completed the State of Vermont Subrecipient Annual Report. This report can be found on the State of Vermont's

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Department of Finance and Management's web page, (forms-→grant recipient form) with instructions for submission. This element of pre-award eligibility is required regardless of funding source. As a condition of your federally funded grant award(s) from the State of Vermont, you must complete this report in its entirety annually within forty-five (45) days after your fiscal year end. CCVS will not issue your grant awards unless this requirement is fulfilled.

ISSUANCE PROCEDURES

GRANTEE APPLICATION AND SELECTION PROCESS

Grant grant applications are submitted via the State of Vermont's Grant Electronic Application and Reporting System. (GEARS) <https://grants.vermont.gov/IGXLogin>

CCVS may require some grants applications to be processed and accepted through the CCVS' email address financial.reports@ccvs.vermont.gov.

Each application must contain the following information:

- Sub-grantee information, contact names, addresses, phone numbers, UEI (UNIQUE ENTITY IDENTIFIER) numbers, and Supplier Number this to ensure that information is updated yearly, and that Standard Grant Agreements contain accurate information.
- A budget summary including a detailed budget narrative of the intended use of the funds. When a non-federal match is required, budgets will describe whether the match is cash or in-kind.
- Signed civil rights assurances.
- Insurance Certificates
- Organizational Budgets
- Organizational Conflict of interest policy (if a non-profit)
- Most recent audit and/or review

MATCH REQUIREMENTS FOR FEDERAL GRANT PROGRAMS

Certain federal grant programs require that the sub-grantee support a percentage of their project with non-federal cash or in-kind resources.

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Match for CCVS Federal Grant Programs are calculated in the following ways:

| Federal Award | Award Amount | % Match Required | Calculation | Match Amount | Total Project Cost |
|---------------|--------------|-------------------|---------------------------------------|--------------|--------------------|
| VOCA | \$100,000.00 | 20% or .80 | $SUM(GrantAmount/0.8 - GrantAmount)$ | \$25,000.00 | \$125,000.00 |
| STOP | \$100,000.00 | | $SUM(GrantAmount/0.75 - GrantAmount)$ | \$33,333.33 | \$133,333.33 |
| FVPSA | \$100,000.00 | 20% or .80 | $SUM(GrantAmount/0.8 - GrantAmount)$ | \$25,000.00 | \$125,000.00 |
| SASP | \$100,000.00 | No Match Required | | 0 | |

US Territories (not including Puerto Rico), and American Indian and Alaskan Native tribes, and projects that operate on tribal lands are excepted from the match requirement. The source of the match must be an allowable expense under the VOCA grant program. The sources of the project match may include but are not limited to the following:

1. cash, i.e., the value of direct funding for a project.
2. volunteered professional or personal services.
3. materials/equipment, but the value placed on lent or donated equipment shall not exceed its fair market value.
4. space and facilities.
5. non-VOCA funded victim assistance activities, including but not limited to performing direct service, coordinating, or supervising those services, training victim assistance providers, or advocating for victims.
6. discounts, any reduction or discount provided to the sub-recipient shall be valued as the difference between what the sub-recipient paid and what the provider's nominal or fair market value is for the good or service.

The **Victims of Crime Act (VOCA)** grant requires that sub-recipients contribute not less than twenty percent of the total cost of each project with non-federal funds/sources.

Match or "cost sharing" means that a portion of the project's cost is not paid with Federal funds. Match funds are typically stated as a percentage of the total project cost. The formula to determine the VOCA match is $Award\ Amount / .8 - Award\ Amount$. Thus, the match for a 10,000 VOCA grant would be calculated, $\$10,000 / .8 - \$10,000 = \$2,500$; so, the entire cost of the project would be \$12,500 (grant amount 10K + 20% match amount, \$2,500).

If a subgrantee does not spend the entire grant award amount during an award period, the required match will be proportional to the amount of the grant award amount expended.

Match amount required for the grant award can be found in the State of Vermont Grant Agreement part 1-grant award detail, section 1, box 19, labeled "match". In addition, the

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match amount can be found in GEARS on the subgrant landing page of the grant application “target amount for application”.

VOCA FIX MANDATORY MATCH WAIVER

Pursuant to the passage of the VOCA Fix Act, CCVS implemented a blanket match waiver for all open VOCA Awards effective July 1, 2023. Any matching requirement, in its entirety, is therefore waived until 12 months after the expiration of the National Emergency Pandemic Period of May 11, 2023. Therefore, any VOCA subawards that are issued after May 11, 2024, would no longer qualify for VOCA mandatory match waiver.

Match Waiver Request

A match waiver request for the grant award will be considered under CCVS ordinary match waiver process, outlined and available at <http://www.ccvs.vermont.gov/support-for-professionals/grants-program/program-reporting>. Subgrantees have the right to accept or decline this waiver.

The **STOP (Services, Training, Officers and Prosecution)** grant requires 25% non-federal match on the total grant award. The match may be cash or in-kind. In-kind match may include donations of expendable equipment; office supplies; workshop or education and training materials; workspace or the monetary value of time contributed by professional and technical personnel and other skilled and unskilled labor if the services provided are an integral and necessary part of a funded project.

1. Tribes and victim service providers are **exempt** from the match requirement.

The formula to determine the STOP match is $\text{Award Amount} / .75 - \text{Award Amount}$. Thus, the match for a \$10,000.00 STOP grant would be calculated, $\$10,000.00 / .75 - \$10,000.00 = \$3,333.33$; so, the entire cost of the project would be \$13,333.33 (grant amount 10K + 25% match amount, \$3,333.33).

The **Family Violence Prevention and Services Program (FVPSA)** grants are for increasing public awareness about and preventing family violence, domestic violence, and dating violence; and for providing immediate shelter and supportive services for victims of those crimes, as well as technical assistance for the professionals who serve. The FVPSA grant program requires that the sub-grantee provide at least 20% of the project costs.

The formula to determine the match amount for FVPSA is $\text{Award Amount} / .8 - \text{Award Amount}$. Thus, the match for a 10,000 FVPSA grant would be calculated, $\$10,000 / .8 - \$10,000 = \$2,500$; so, the entire cost of the project would be \$12,500 (grant amount 10K + 20% match amount, \$2,500). The match can be cash or in-kind and needs to be an allowable expense under the FVPSA regulations.

The **Sexual Assault Services Program (SASP)** Formula Grant Program supports rape crisis centers and other nonprofit, nongovernmental organizations or tribal programs that provide

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services, direct intervention, and related assistance to victims of sexual assault. There is no match required for SASP sub-grantees.

GRANT APPROVAL PROCESS

For non-competitive state grant programs or federal formula grants, whose purposes have been mandated by the Vermont legislature or the United States Congress, some sub recipient awards are determined using fully researched formulaic percentages that are related to square miles in the service area; the number of towns in the service area; the number of counties in the service area; population of the service area (using census data) and services provided.

For competitive grant solicitations, the Vermont Center for Crime Victim Services will issue Request for Proposals (RFPs). The RFPs will provide guidance to applicants, outline the criteria and process from which the proposals will be evaluated and the contractual terms that will govern the relationship between the State of Vermont and the award recipients.

Once a completed application package is submitted from the sub-grantee the risk assessment will be completed to determine if the sub-grantee is high risk or not. The budgets will be reviewed for accuracy and that expenditures are within the guidelines of the state and federal requirements. The application is reviewed by the CCVS finance/grants staff for approval. Once approved the Standard Grant Agreement will be issued and signed by the Executive Director and available in GEARS under Grant Agreement Information.

A copy of the current CCVS Standard Grant agreement is available in GEARS..

GRANT AMENDMENTS

There are two different types of grant amendments, the first is a Budget Amendment and the second is a Grant Amendment.

I. Budget Amendments:

The Vermont Center for Crime Victim Service encourages grantees to modify their grant budgets whenever necessary to ensure the efficient and effective use of funds. Budget amendment requests must be submitted no later than 90 days prior to the grant award end date. Budget Amendment requests are not considered retroactive, and no expenses should be incurred until after a budget amendment has been approved.

Subgrantees must request a budget amendment in the GEARS system when:

- They are aware of any significant changes to the approved budget and/or project.
- Amendments of 10% or more of any approved line item will require prior approval before expenditures are incurred.
- Amendments are also required when grantees seek to incur expenses in a new line item that was not included in the approved budget.

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II. Grant Amendments

A grant amendment is when there is a change in the overall amount of the grant or the project period. A grant amendment requires that a new award document be issued and signed by both CCVS and the subgrantee.

Grant Amendments are required to a grant when:

1. There is *any* change in program scope or objectives; or
2. There is *any* increase or decrease in the total amount of the grant.
3. There is a change in the award period for the grant.

The Grant Amendment will be entered in the Grants Tracking Module of VISION for tracking. And the newly issued Grant Award as Amended will be uploaded in GEARS.

No changes, modification, or amendments in terms and condition of Grant Agreements shall be effective unless reduced to writing, numbered, and signed by the duly authorized representative of the State and Subrecipient.

PROCUREMENT

SUBRECIPIENT OR CONTRACTOR DETERMINATION

When a grant award contains Federal funds, CCVS must determine if the grantee's relationship with them is that of a subrecipient or of a contractor. Non-Federal entities may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities.

When issuing Federal subawards, pass-through entities must make case-by-case determinations whether each agreement casts the party receiving the funds in the role of a subrecipient or of a contractor per the guidelines in §200.330 of the Uniform Guidance.

Federal awards expended as a subrecipient are subject to the audit requirements of OMB Circular A-133 and Subpart F of the Uniform Guidance, the grantee is required to submit the Subrecipient Annual Report to F&M, and the award may be subject to additional reporting requirements. The payments for goods or services provided as a contractor are not considered Federal subawards and are not subject to the reporting or audit requirements inherent with subrecipient awards.

- a) **Subrecipient:** A subrecipient is defined by the Uniform Guidance as “a non-Federal entity that receives a subaward from a pass-through entity to carry out a federal program; but does not include an individual that is a beneficiary of such a program.” A subrecipient may also be a direct recipient of federal awards under
- b) **Contractor:** A contractor is defined by the Uniform Guidance as “an entity that receives a contract as defined in §200.22 Contract.” A contract is defined as “a legal instrument by which a non-Federal entity purchases property, or services needed to carry out the project

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or program under a federal award.” It is for the purpose of obtaining goods and services for the non-Federal entity’s own use and creates a procurement relationship with the contractor.

The Center for Crime Victim Services (CCVS) will use the State of Vermont Subrecipient vs. Contractor Form to determine if the entity receiving funds has a contractor or subrecipient relationship.

CONTRACT AND CONSULTANT PROCEDURES

All procurement contracts will follow the procedures set forth in the State of Vermont Agency of Administration’s [Bulletin No. 3.5 Procurement and Contracting Procedures](#). This bulletin provides guidelines for conducting procurements and contracting and establishes minimum benchmarks and protocols to ensure the solicitation and awarding of contracts for services are completed with sufficient competition. The State process is designed to: ensure fair and open competition; guard against favoritism, improvidence, extravagance, fraud, and corruption; ensure the results meet Agency needs; provide for checks and balances and oversee Agency procurement activities; and protect the interest of the State and its taxpayers.

All Center for Crime Victim contracts shall include payment provisions to ensure that rates do not exceed the maximum allowable federal rate per diem or hour. Compensation for individual consultant services procured under a CCVS grant award must be reasonable and allocable in accordance with 2 C.F.R. Part 200 Subpart E, Cost Principles and consistent with rates paid for similar services in the marketplace.

Compensation for individual consultant services is to be reasonable and consistent with that paid for similar services in the marketplace. Unless otherwise approved by the applicable federal or state agency, consultant rates will be based on the salary a consultant receives from his or her primary employer or documentation of previous instances when a similar rate has been charged by or paid to the consultant/contractor, as applicable, up to \$650 per day or \$81.25 per hour. The consultant/contractor must provide justification for any consultant rate more than \$650 per day or \$81.25 per hour and receive approval by the applicable state or federal agency before entering a contract.

Consultant and contractor daily rates do not include travel or subsistence costs, but may include preparation, evaluation, and travel time.

CONTRACTOR INVOICES

All consultant invoices must be supported by time and activity reports. This should include a detailed explanation or worklog containing the dates and hours worked, the tasks performed on these dates, and the deliverables provided.

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DISBURSEMENT OF GRANT FUNDS

Financial Status Reports are required from all sub-grantees for all grants at least quarterly depending on the grant program. Financial Reports are submitted in GEARS for each quarter. Financial reports are due 15 days after the end of each quarter. (Oct 15th, Jan 15th, April 15th, and July 15th). All funds not spent by June 30th shall revert to the Center.

Grant payments are made through the VISION Accounts Payable module subject to procedures established by the Vermont Department of Finance and Management. The invoice number on the VISION voucher must contain the grant award number which must match the grant number as entered in the Grants Tracking module. The financial report from the grantee will be retained in the granting agency's files in accordance VISION Procedure No. 2-VISION Records Retention Procedure. Payments may only be made to the official grantee for the award. Therefore, if a grant agreement is made to an organization utilizing a fiscal agent, payment may only be made to the party designated as the official grantee.

If the grant award is a federal sub award, the Federal share of the payment must also use a Class Code of **00001** to identify it as a sub recipient payment. When an award is funded with a combination of state and federal funds, the Class Code is only required to be used for the Federal share of the payment, though it is permissible to use it for all payment rows. If a federal grant has been identified as a contractual relationship, do not use the Class Code.

STATE GRANT DISBURSEMENTS

State grant programs are awarded to sub-grantees on the state fiscal year July 1- June 30th. Quarterly financial reports will be completed in GEARS detailing the amounts spent and funds left on-hand for each quarter. CCVS financial/grants staff will review expenditures against the approved budget. State grants are disbursed on a reimbursement only method. Once the financial report reimbursement has been approved in GEARS payments will be processed to sub-grantees through the Vermont Department of Finance.

FEDERAL GRANT DISBURSEMENTS

Federal grant awards to sub-grantees typically follow the fiscal year July 1-June 30th. Once a signed Standard Grant Agreement and all required documentation is filed with CCVS, sub-grantees are required to submit quarter financial reports in GEARS. Federal grants are administered in accordance with [Title 2: Grants and Agreements Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#). Sub-grantees will only be reimbursed for actual expenditures reported each quarter. The CCVS financial/grants staff will review and check expenditures against the approved budget. Once the financial report reimbursement has been approved in GEARS payments will be processed to sub-grantees through the Vermont Department of Finance.

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Federal grant programs are awarded and disbursed pursuant to federal regulations and guidelines. In the event the Center enters into a grant agreement (contract) for services rendered, using any federal funds, the Center will first check the excluded parties list located at <https://www.sam.gov/portal/public/SAM/> to verify if a vendor or contractor has been suspended or barred. The Center will not enter into a grant agreement (contract) with anyone appearing on that list.

MONITORING PLAN

PERFORMANCE MANAGEMENT

All grants, whenever practicable, regardless of funding source, should include performance, measures, goals and monitoring. All performance related requirements, including reporting requirements, must be specified in the written grant agreement. If payment is linked to performance measures, this must be specified in the Payment Provisions.

Programmatic Reports and statistical data are required from all sub-grantees for all grants quarterly or biennially depending on the grant program. These will be submitted to the Grants Manager with the due dates indicated on the award documents.

RISK ASSESSMENT

A risk assessment will be completed for each sub-grantee in GEARS, by the CCVS finance/grants staff based on the total grant awards. If a sub-grantee is high-risk, and it is in the best interest to grant the award to the sub-grantee, a written justification must be included in the official grant file and must be approved by the Appointing Authority. The award must be issued on a reimbursement only basis and additional monitoring requirements may include frequent programmatic review, additional review of quarterly financial reports, site visits, etc. When a grant award includes special conditions or additional requirements, these must be clearly specified in the grant award document.

Risk Assessment considerations shall include the following:

1. Compliance with terms and conditions of prior grant awards
2. Total amount and/or complexity of the award
3. Financial stability and accounting system of the organization
4. Recent incidences of fraud, embezzlement, or mismanagement
5. The results of prior audits, including single audits, when applicable
6. Prior experience with similar awards
7. Current staffing levels, staff turnover and qualifications
8. Method of tracking hours charged to grant.

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9. Other issues that may indicate high risk of non-compliance.

It is the Center's policy that sub-grantees do not have family members of agency staff serving on the board of directors. Nor should the agency employ other family members of agency staff. Funding from the Center is contingent upon compliance with this policy.

The current CCVS risk assessment form is available in GEARS.

CIVIL RIGHTS COMPLIANCE

All CCVS grant recipients are subject to prohibitions against unlawful discrimination. Each year, CCVS grantees are required to comply with all the state and federal civil rights statutes that are Described in the CCVS Civil Rights Assurances document. The duly authorized agent of the subgrantee organization must sign this document in GEARS which indicates agreement with compliance of the statutes therein. Receipt of funding is contingent on the subgrantees compliance of this condition. Furthermore, subgrantees are required to appoint an appropriate staff person to either view all the online training videos at the Office for Civil Rights website, or to attend the annual civil rights training offered by the Vermont Center for Crime Victim Services.

EQUAL EMPLOYMENT OPPORTUNITY PLANS (EEO)

All non-profit recipients must complete a Certification Form in which they declare that they are exempt from EEO obligations. Please follow this link to begin this process:
<https://eop.ocr.ojp.gov/certsub/homepage>.

The EEO's purpose is to ensure that recipients of financial assistance from the Justice Department are providing equal employment opportunities to men and women regardless of sex, race, or national origin.

ON-SITE & ENHANCED DESK REVIEW MONITORING

Pursuant to § 94.106 Monitoring Requirements of the 7/2016 VOCA (Victims of Crime Act) Rules and Regulations CCVS shall determine the frequency of sub-grantee site visits based on sub-grantees risk assessment. Risk assessments will be conducted annually on all sub-grantees. Sub-grantees determined to be high risk will receive on-site monitoring once every two years. Sub-grantees with low or moderate risk will receive on-site monitoring at least once every four years. CCVS performs routine monitoring, to learn more about program facilities services, and financial practices and to provide technical assistance. Our goal is a monitoring process that embraces open communications, mutual respect, problem-solving and diversity to ultimately support strong effective programs, in addition to compliance with federal and state requirements.

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MONITORING PROCEDURES

- Pre-Site Visit letter will be sent to the sub-grantee to schedule a site visit, the letter will include a list of the grants to be reviewed, what the visit will include, who should be present for the site visit, etc.
- Pre-Site Visit Checklist will be sent to the sub-grantee, the checklist outlines materials and/or documents that should be submitted electronically to CCVS two weeks prior to the site visit date. The Pre-Site Visit checklist also includes documentation/materials that should be available to CCVS staff during the site visit. Sub-grantees may be required to send CCVS additional documentation for grant related expenses as part of these reviews.
- The CCVS Site Visit Checklist will be sent to the sub-grantee. The CCVS Site Visit Checklist should be completed by the Executive Director, Board Chair, and staff members as necessary to complete the checklist. Once completed the Executive Director and Board Chair are required to acknowledge and sign the checklist and return to CCVS at least two weeks prior to the site visit date by either a PDF format or by mail.
- During the site visit the CCVS staff will review the CCVS Site Visit Checklist that was completed by the sub-grantee and verify programmatic, financial and grant requirements.
- A Site-Visit/Enhanced Desk Review Final Report will be sent to the executive director and the board chair upon completion of a site visit either indicating that no issues were identified during the site visit and no further action is required by the sub-grantee or if a site visit indicates that issues were identified during the site visit the sub-grantee must respond with a plan to resolve the identified issues.
- Corrective Action Plan: Issues identified by the Grantor (CCVS) need to be resolved by the sub-grantee and require both acknowledgement and resolution action in writing by the sub-grantee.
- CCVS will keep on file the Pre-Site Visit Letter, CCVS Site Visit checklist, Final Report, Corrective Action Plan (if applicable) and all materials provided by the sub-grantee. A copy of the final report will be uploaded to the GEARS system.

A site visit may also be scheduled with any sub-grantee for any of the following reasons:

- Significant staff turnover.
- If CCVS receives complaints about a program and/or staff.
- Reports are inadequate or consistently late.
- Relevant Audit Findings or non-compliance with audit policy.

The purpose of all site visits and enhanced desk reviews are as follows:

- Meet with Director, Board Chair, Board Members, and program staff to talk about the program's services.
- Meet with Board Chair and Board Members about their role and the role of the board with the program.
- Gather information about services, needs, challenges, and best practices in the field.

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- Review budget and accounting procedures, including match requirements and staff time sheets when applicable.
- Review Programmatic policies and procedures.
- Answer any questions about the CCVS and the grant programs etc.
- Provide technical assistance as needed.

DESK REVIEW

Sub-grantees may be required to send CCVS back up documentation for grant related expenses as part of periodic desk reviews. CCVS requires all sub-grantees to complete a quarterly financial report for each grant award. The financial report includes the actual amount of grant funds received and grant funds expended during that quarter and Year to Date (YTD) information. CCVS financial and/or grant staff reviews the expenditures reported to the actual approved budget for each category per grant. CCVS may at any time request from the sub-grantee back up documentation to verify expenditures reported during any quarter or YTD.

SANCTIONS/TERMINATION OF GRANT AWARDS

When CCVS determines that a sub-grantee is out of compliance with State or Federal law, rule, or regulation; is out of compliance with the terms and conditions of the grant agreement, performance requirements or auditing requirements; is suspected of fraud or misuse of funds; or fails to take corrective actions on audit findings, etc. The following sanctions may be implemented:

- Delaying payments or issuing partial payments
- Making payments on a reimbursement basis only
- Placing additional reporting requirements on the award
- Disallowing costs and/or offsetting or requesting repayment if funds have been advanced.
- Conducting or arranging for an independent audit and/or site visit
- Classifying the sub-grantee as “high-risk” and withholding future funds

Termination of Grant Agreements

Per Attachment C, Standard State Provisions, for Contracts and Grants “Either party may terminate this Agreement if a party materially breaches its obligations under this Agreement, and such breach is not cured within thirty (30) days after delivery of the non-breaching party’s notice or such longer time as the non-breaching party may specify in the notice.”

CCVS may consult with the Commissioner of Finance and Management and/or the Office of the Vermont Attorney General before imposing more severe sanctions and must consult with the commissioner before imposing sanctions for awards that are identified in statute or otherwise directed by the General Assembly or pass-through entitlement grants.

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AUDIT POLICY

CCVS will verify that every sub recipient with Federal award expenditures meet the single audit thresholds of OMB Circular A-133 (for fiscal years beginning before December 26, 2014, or Uniform Guidance Subpart F (for fiscal years beginning on December 26, 2014 or after is audited accordingly).

Prior to September 30, 2024, non-Federal entities that expend \$750,000 or more in Federal awards must have a single or program-specific audit conducted in accordance with Uniform Guidance, Subpart F (200.501 CFR Chapter II, Subpart F); after October 1, 2024 this will be raised to \$1,000,000. A non-Federal entity may elect to have a program-specific audit if they expend Federal awards under only one Federal program (excluding R&D) and the Federal program's statutes, regulations, or the terms and conditions of the Federal award do not require a financial statement audit. It is the responsibility of pass-through entities to verify that their subrecipients who meet these thresholds have an audit conducted in accordance with the appropriate Federal regulations.

Even when an audit might not be required for your program/s, CCVS still encourages subgrantees to consider the potential benefits of conducting one. Ultimately, audits help build financial transparency, and are a way to build an organization's reputation for integrity which may assist fundraising efforts. If an organization's board governance, or policies and procedures require an independent audit when CCVS policy does not, the requirement to do an audit per the organization's rules prevails.

The CCVS financial/grants staff will review the audit, if accepted the information about the single audit will be entered into the Grants Tracking module in VISION.

Information includes, but is not limited to:

1. When the audit was received by the primary pass-through entity
2. When the audit was reviewed by the primary pass-through entity
3. Whether or not there were any findings
4. Whether or not a Corrective Action Plan was requested and received
5. When the audit was accepted (finalized) by the primary pass-through entity
6. If/when a management decision letter was sent
7. Adding comments pertaining to the audit review

STATE AND/OR FEDERAL REPORTING

FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA)

The Center for Crime Victim Services, as a prime grant recipient is subject to the FFATA sub-award reporting requirements as outlined in the Office of Management and Budgets guidance

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issued 4/5/2023 and Finance and Management Policy No. 8. Thus, CCVS is required to file a FFATA sub-award report by the end of the month following the month in which the CCVS awards any sub-grant greater than or equal to \$30,000. This information will be reported on the GSA's eSRS/FSRS website.

To meet this requirement, in a timely manner, the Center for Crime Victim Services has integrated a FFATA report into its newly developed Grants Management System. This report will create a spreadsheet with the required FFATA fields, including subrecipients valid UEI (UNIQUE ENTITY IDENTIFIER) numbers. This report will appear on the Grants and Finance personnel's task list in the Grants Management System at least two weeks in advance of the FFATA due date.

VICTIMS OF CRIME ACT SUBGRANTEE AWARD REPORT

The Subgrant Award Report (SAR) is a requirement for state agency recipients (e.g. grantees) that receive Victims of Crime Act (VOCA) funding from the office for Victims of Crime (OVC) to deliver victim assistance services. Grantees use the SAR to collect basic information on subgrantee recipients and the program activities that will be implemented with VOCA plus patch funds. This data will be submitted by the CCVS Grants Manager with the following parameters:

1. The CCVS Grant Management System is configured to require that subgrantees attach a VOCA SAR report upon application. Subgrantees will receive an error message requiring the SAR form to be uploaded. The application will not be approved unless this document is submitted.
2. CCVS will then complete a SAR for each subgrant award of VOCA funding in the Office for Victims of Crime Performance Measurement Tool (PMT) platform within 90 days of the subaward start date. **The Grant Managers review all subaward start dates and verify that the SAR has been submitted within 90 days.**
3. To ensure that subrecipients SAR forms are entered into the DOJ's PMT the CCVS grants manager shall run a report that specifies the SAR forms that need to be entered.
4. The report requires two levels of data:
 - a. Profile of the subgrantee recipient receiving VOCA funds.
 - b. Information on the activities that the VOCA-funded subgrantee program will implement.
5. Changes or revisions to the award that occur before the end of the project period will be made in the SAR within 30 days of the change taking effect.
6. A SAR created with dates that fall within the annual reporting period (federal fiscal year) will be associated with Performance data submitted for that federal fiscal year.

VISION GRANT TRACKING MODULE

After a grant agreement has been fully executed by both CCVS and the subgrantee, a copy of the entire agreement will be available in GEARS. All grants must be entered in the VISION Grant Tracking module within 10 business days after grant execution. Entry in VISION should be in accordance with procedures and requirements as set forth by F&M.

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GRANT CLOSE OUT PROCESS

The final financial status report for SFY quarter ending June 30th is due by July 15th.

State Funds not spent by June 30th revert to CCVS. The CCVS financial/grants staff will review and check expenditures against the approved budget.

Federal Grant closeout procedures via GMS closeout section with 5 closeout components that need to be completed as follows:

1. Final progress report
2. Final Federal Financial Report (FFR)
3. Special Conditions
4. Financial Reconciliation
5. Programmatic Requirements Certifications

JustGrants will automatically generate administrative closeout and any remaining funds will be frozen. Closeout is due 90 days from the grant award end date.

OFFICIAL GRANT FILE

CCVS will maintain an up-to-date grant file with award-related documents on file as public record in accordance with the records retention policy established by the Vermont State Archives and Records Administration, GRS-1633.1110: Grants Management Records. If the records pertain to a federal sub award, and Federal regulations require a longer retention period, the Federal regulations will supersede GRS-1633.1110. Grant files may be kept electronically within the GEARS system.

All grant records are in the Grants Electronic Application and Reporting System (GEARS). In addition, audits and site visit supporting documentation will be saved in the administrative drive under grants/audits and/or site visits.

NAMING CONVENTIONS in GEARS

CCVS Business Unit Number (02160) ID-GRANT NAME-YEAR OF FEDERAL OR STATE AWARD-SUBGRANTEE SUPPLIER ID-1

For example, 02160-VOCA20-2571-1 tells us that the grant is from CCVS, that the funding source is the FFY VOCA 20 grant, the 2571 is the subgrantee's supplier ID, and the one indicates it is the first time that this subgrantee received funding from that particular VOCA award.

DOCUMENTATION in GEARS

1. The signed original grant agreement, all amendments to the original agreement, and copies of all written correspondence pertaining to the award, written correspondence

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includes electronic communication such as e-mail. Grant application, including staff analysis of application when award is competitive in nature.

2. Pre-Award Risk Assessment form by Fiscal Year.
3. Suspension and Debarment certification/documentation if it is separate from the grant agreement per sub-grantee.
4. Civil Rights Assurances signed by the sub-grantee per each sub grant.
5. Insurance certificates and/or approved Request to Modify Insurance Requirements form. Subgrantees will also provide Insurance Binders with expiration dates into GEARS.
6. Programmatic Grant modification forms will be completed in GEARS.
7. All financial reports will be completed in GEARS and will include the VISION voucher #, approved budget and if applicable any grant modification form(s).
8. Final site visit & enhanced desk review reports will be kept in GEARS.

GRANT FILES KEPT IN OTHER LOCATIONS

Programmatic and performance reports required to be filed by the subgrantee will be kept in the PMT system.

Site Visits documentation will be kept in an electronic Site Visit file by fiscal year as well as there may be some paper files that include documentation that was received during the site visit. The site visit folder will include the initial letter to the sub-grantee, the documents that CCVS received from the sub-grantee, the checklist completed and signed by the sub-grantee and the post site visit letter from CCVS to the sub-grantee, along with any correspondence in response to the final letter.

Documentation of monitoring activities performed by the granting agency, including audit reports and documentation of single audit review, when applicable will be uploaded in GEARS per sub-grantee. Single audit reviews will also be entered in VISION.

**Note: If the granting agency executes multiple grant agreements with the same grantee, documentation of monitoring activities may be filed in a comprehensive vendor file rather than in each individual grant file, but reference to the vendor file must be included in each grant file. Invoices and payment documentation must be filed in accordance with VISION Procedure No. 2- VISION Records Retention Procedure and is not required to be included in the Grant File.*

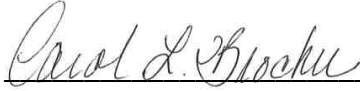
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SIGNATURE OF PLAN



Jennifer Hurlbut Poehlmann, JD
Executive Director

5.29.2024
Date



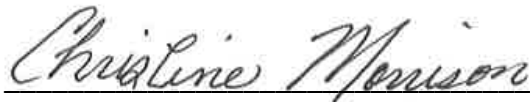
Carol L. Brochu
Financial Director & Grant Plan Contact

5.29.2024
Date



Gene Nelson
Grants Manager

5.29.2024
Date



Christine Morrison
Grants Management Specialist

5.29.2024
Date

DocuSigned by:



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Adam Greshin
Commissioner
VT Department of Finance & Management

6/26/2024 | 4:10:59 EDT

Date

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APPENDIX

APPENDIX I SUBRECIPIENT vs. CONTRACTOR FORM

State of Vermont

Subrecipient vs. Contractor Form



FEDERAL SUBRECIPIENT OR CONTRACTOR (VENDOR) DETERMINATION CHECKLIST
Per OMB Uniform Administrative Requirement [2 CFR §200.331 Subrecipient and contractor determinations](#), CCVS must determine whether a SUBRECIPIENT or CONTRACTOR (vendor) relationship exists with an entity identified for an executed agreement. This is mandatory for all federally funded contracts and subawards under the [Agency of Administration Bulletin 5, Policy for Grant Issuance and Monitoring](#). When determining whether an entity is a subrecipient or a contractor it is critical to use your judgment in evaluating the substance of the relationship between CCVS and the entity.

Please complete this worksheet and attach to the contract or subrecipient agreement.

Name of Entity (Payee): _____ Date: _____

Based on the descriptions below, please choose the **ONE** that most closely characterizes your activity:
For additional description see Bulletin 5.

SUBRECIPIENT – The entity:

- Determines who is eligible to receive federal assistance.
- Has its performance measured in relation to whether objectives of the federal program were met.
- Has responsibility for programmatic decision making.
- Is responsible for adhering to applicable federal program requirements specified in the award.
- Uses the federal funds to carry out the specified program, as opposed to providing goods or services for the benefit of the pass-through entity.

OR

CONTRACTOR – The entity:

- Provides goods and services within normal business operations.
- Provides similar goods or services to many different purchasers.
- Normally operates in a competitive environment.
- Provides goods or services that are ancillary to the operations of the Federal program.
- Is not subject to Federal program compliance requirements as a result of the agreement, though similar requirements may apply for other reasons.

Additional explanation for determination (if needed):

Contract No. _____ Subaward No.: _____

Prepared by: _____ Date: _____