



Department of Finance and Administration
Office of Intergovernmental Services
Victim Justice and Assistance Program

MANAGING YOUR FEDERAL SUBGRANT

STEPS TO ENSURE COMPLIANCE

Presented by: Sandra L. Cook, MPA

CONGRATULATIONS!
YOU GOT THE SUBGRANT.

**SUBGRANT
REPORTING**

**ORGANIZING FOR
OPTIMAL SUCCESS**

**SUBGRANT
REQUIREMENTS**



ORGANIZING FOR OPTIMAL SUCCESS

- ❖ Upon notification of an award, it is imperative that you read and understand the **Terms and Conditions** of the award.
- ❖ Develop a management task plan.

ORGANIZING FOR OPTIMAL SUCCESS

- ❖ Familiarize yourself with the grant program under which you are funded (FVPSA, VOCA, STOP, SASP).
- ❖ Be sure that you can comply with the financial requirements.
- ❖ Meet with all staff involved to ensure their understanding of the goals and objectives and their individual responsibilities.



SUBGRANT REQUIREMENTS

All DFA/IGS subgrant entities must have a DUNS number. www.dnb.com/us/

All subgrantees are required to maintain a current registration in the Central Contractor Registration (CCR) database. www.ccr.gov

SUBGRANT REQUIREMENTS

❖ Meaningful Access to Victims With Limited English Proficiency (LEP) must be provided

www.lep.gov

- *Number/proportion of LEP persons eligible/likely to be served by the program;*
- *Frequency with which LEP individuals come in contact with the program;*
- *Nature/importance of the program to people's lives;*
- *Resources available and costs.*

SUBGRANT REQUIREMENTS

- ❖ Civil Rights Compliance – includes written policy, as well as employee and victim notification.

www.ojp.usdoj.gov/ocr/



CIVIL RIGHTS COMPLIANCE EXAMPLE

❖ A shelter has a policy that residents cannot take any prescribed psychotropic medication while staying at the shelter.

❖ IS THIS AN ACCEPTABLE POLICY?

CIVIL RIGHTS COMPLIANCE EXAMPLE

- **ANSWER: NO!** This is a blanket exclusionary policy, the shelter has discriminated against persons who may have a mental disability but that may be controlled by medication.
- An individualized assessment must be done of the resident.

SUBGRANT REQUIREMENTS

- ❖ **Conflict of Interest** - maintain either written standards or a written code of standards of conduct governing the performance of employees engaged in the subgrant.
- ❖ A conflict may arise when an immediate family member is hired or has a financial or other interest in the agency. The standards must provide for disciplinary actions to be applied for violations.
- ❖ DFA/IGS must be notified in writing of any staff change in a grant-funded position.

SUBGRANT REQUIREMENTS

- ❖ **The Code of Federal Regulations (CFR)** - codified rules and regulations governing most departments and agencies of the Federal Government. www.ecfr.gpo.gov
- ❖ **Award Special Conditions** (*Assurance /Certifications*)
Record retention and access; Program and financial reporting requirements; Pro Children Act of 1994; Whistler Blower's Act, Anti-Lobbying, etc.

SUBGRANT REQUIREMENTS

- ❖ Services provided free of charge.
- ❖ Services must be voluntary.
(No condition may be applied for the receipt of emergency shelter)
- ❖ Address and location of shelter must be kept confidential.
- ❖ No direct payment of funds to victims.
- ❖ Non-disclosure of victim confidential information.

SUBGRANT REQUIREMENTS

- ❖ Reimbursement requests submitted monthly.
- ❖ Quarterly performance reports.
- ❖ Use of DFA/IGS employee timesheet.
(regardless of % of time on grant. ALL time worked (not just VOCA/FVPSA/SASP/STOP time).
- ❖ Victim Compensation Assistance.

SUBGRANT REQUIREMENTS

❖ **Match Requirement** - *restricted to the same uses as the federal funds. If you cannot receive federal funds for an item or service, you cannot use it as match.*

❖ **Use of volunteers**

On-duty - A volunteer who comes to an agency location to answer hotline calls and is present from 8:00am to 12:00pm may be counted as 4 hours or \$40.00 no matter how many or how few phone calls are actually received.

On-Call - A volunteer who is “available” to assist with the hotline from 8:00am to 12:00pm, but remains at home and is not called upon to respond to any calls may not be counted at all.

SUBGRANT REQUIREMENTS

- ❖ All shelter programs funded by DFA/IGS are required to track program outcomes which indicate that as a result of contact with the domestic violence program:
 - ❖ Program participants have more strategies for enhancing their safety; and
 - ❖ Program participants have more knowledge of available community resources.

NEW DFA REQUIREMENT

The Arkansas Financial Transparency Act

The Department of Finance and Administration (DFA) is required to publish a database of State Government Expenditures – including subgrantee reimbursements.

SUBGRANT REPORTING

DFA/IGS requires Reimbursement Requests be submitted monthly, no later than the 15th of each month.

Requests must be submitted on the form supplied by DFA/IGS.

Forms are individualized and based on the approved budget.

Only approved line items are included.



SUBGRANT REPORTING

If I have no expenses to report for the month, do I still have to submit something?



YES, you are required to submit the report monthly. If you have no expenses, submit the request along with an explanation of why there were no expenditures.

SUBGRANT REPORTING

Reimbursement requests - Include all supporting Documentation.



Be as detailed as possible – If we can't figure it out, we won't pay it.

The more detailed and accurate your request, the better the chances that your request will not be adjusted.

For more detailed information, refer to the “*Reimbursement Request Processing Presentation*”

SUBGRANT REPORTING

QUARTERLY PROGRAM REPORTS

- ❖ Goals and Objectives
- ❖ Statistical Summary
- ❖ Performance Report
 - Be sure to answer all questions asked.
 - Review to ensure consistency.
 - Include an explanation of “other” categories.
 - Report “unduplicated” victims served.

SUBGRANT REPORTING

In addition to the monthly reimbursement requests and quarterly program reports, DFA/IGS requires the following annual reports:

- Performance Report
- Inventory report
- Audit or Financial Statement Review
- Year End Expenditure Report



DFA/IGS forms can be found on its website.

SUBGRANT REPORTING

DFA/IGS subgrant entities are required to request or report **ALL** program changes.



Subgrant adjustment requests must include the reason(s) and basis for the proposed change, as well as the impact on the agency's ability to accomplish the approved subgrant goals and objectives.

SUBGRANT REPORTING

WHAT IF REPORTS ARE LATE?

- Notification via e-mail.
- Suspension of reimbursements.
- May impact future funding.
- May result in suspension of subgrant.

QUESTIONS





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DFA/IGS CONTACT INFORMATION

Sandra L. Cook, Program Manager @ 501-682-5149

FVPSA - Benita Bosier-Ingram @ 501-683-1238

VOCA - Kenya Buffington @ 501-682-5150
- Thomas Herndon @ 501-683-2539

STOP/SASP - Debbie Bousquet @ 501-682-5266