



**KENTUCKY JUSTICE &
PUBLIC SAFETY CABINET**

**VIOLENCE AGAINST WOMEN ACT (VAWA)
STOP FORMULA GRANT**

Catalog of Federal Domestic Assistance Number: 16.588

**PROGRAM & FINANCIAL
GUIDELINES AND INSTRUCTIONS**

(REVISED 5/2021)

**Kentucky Justice & Public Safety Cabinet
Grants Management Division**

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**KENTUCKY JUSTICE & PUBLIC SAFETY CABINET
GRANTS MANAGEMENT DIVISION
VIOLENCE AGAINST WOMEN ACT (VAWA)
STOP FORMULA GRANT**

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GRANTS MANAGEMENT DIVISION
STOP FORMULA GRANT

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INTRODUCTION

This document is prepared by the Kentucky Justice & Public Safety Cabinet, Grants Management Division, and is consistent with guidance developed by the USDOJ, Office on Violence Against Women. The document's purpose is to establish program and financial policy and administrative guidance for the management of the Violence Against Women Act STOP Grant authorized by the Violence Against Women Act (VAWA) of 1994 (reauthorized in 2000, 2005, 2013 and 2019). This document also describes VAWA application and grant management procedures, requirements and instructions.

OPEN AND AWARD PERIOD DATES

Award Period

The standard award period is one calendar year (12 months) from January 1 through December 31. For applications in 2021, the award period will be January 1, 2022 through December 31, 2022.

Application Open Period Dates

The VAWA grant application will be available in *Intelligrants (IGX)* beginning August 2, 2021, and will remain open until September 15, 2021 at 6 p.m. ET.

Grants Management Division will **not grant extensions** of the application due date.

Subaward Information

Minimum number of subawards GMD expects to make:	No established minimum.
Total amount <i>anticipated</i> to be awarded under solicitation:	~\$2.2mil
Amount awarded under previous solicitation:	~\$2.2mil
Period of Performance Start/End Date:	1/1/2022 – 12/31/2022
Period of Performance Duration:	12 months
Federal Awards Anticipated for Usage:	2019-WF-AX-0033; 2020-WF-AX-0006; 2021 (Award Number TBD)

All awards are subject to the availability of funds and to any modifications or additional requirements that may be imposed by USDOJ or JPSC.

Distribution of Funds

Funds granted to the Commonwealth of Kentucky by USDOJ are further subawarded by the Justice and Public Safety Cabinet to state agencies, units of local government, and not-for-profit agencies to carry out programs and projects contained in an approved application that complies with the priorities established by the USDOJ and the Commonwealth.

The Office on Violence Against Women (OVW) requires states to allocate funds based on the following guidelines:

- at least 5 percent will be allocated to state and local courts including juvenile courts;
- at least 25 percent will be allocated for law enforcement;
- at least 25 percent will be allocated for prosecutors; and,
- at least 30 percent will be allocated for nonprofit, non-governmental victim services, of which at least 10 percent is to be distributed to culturally specific community-based organizations; and
- 20 percent of the entire grant award must go to sexual assault services across at least two of the foregoing allocations.

ELECTRONIC GRANTS MANAGEMENT SYSTEM (IGX)

All grant activities are managed through the Kentucky Justice and Public Safety Cabinet’s Electronic Grants Management System, also known as *Intelligrants 10.0 (IGX)*.

Applications should be submitted via *IGX* during the period referenced in this document.

New applicants must establish a user account at www.kyjusticegms.com. Please note validation of new user accounts will take 48-72 business hours. It is not necessary to establish an additional account for returning applicants.

The Authorized Official (AO), designated in *IGX* by the applicant, will receive a confirmation e-mail upon successful submission of an application. This should be retained for the applicant’s records. Applicants have the ability to access the system to confirm the status in the “Information” section on the screen header. Please contact Grants Management Division (GMD) staff prior to the submission deadline if a confirmation has not been received. Questions may be directed to the staff identified on the Contacts page, or by e-mail at JUSGMB@ky.gov.

Requests for reconsideration of submission compliance will only be granted to users providing sufficient documentation of a) timely contact with Grants Management Division staff and b) identification of specific, verifiable system errors. User error will not be considered sufficient justification for submission deadline reconsideration.

Please refer to *IGX* SYSTEM INFORMATION for further instructions and information.

Grant Proposal

All proposals should be concise, clearly written and should fully convey the project for which funds are being requested. Applications are submitted through *Intelligrants (IGX)*, the JPSC’s electronic Grants Management System. Major points must be supported by current local facts and data, with appropriate citations. **Be sure to read the instructions at the top of each page before populating and saving.** *The precision with which the applicant follows the instructions for each section of the application is an important factor in application review.* Most *IGX* text-box application pages will track character limits (number of letters utilized) and display the maximum number of characters allowed per text-box. It is highly recommended agencies use a Word document to create the application for several reasons. Word will track the number of characters and allows for spelling

and grammar corrections, formatting, and other changes. Also, *IGX* activity “times out” and returns to the login screen after 20 minutes. It may be easier to cut/copy and paste from a Word document so information is not lost after a period of inactivity.

Data Universal Numbering System (DUNS) number

The Office of Management and Budget requires that all applicants (other than individuals) for federal funds include a DUNS number in their application for a new award or a supplement to an existing award. A DUNS number is a unique nine-digit sequence recognized as the universal standard for identifying and differentiating entities receiving federal funds. The identifier is used for tracking purposes and to validate address and point of contact information for federal assistance applicants, recipients, and subrecipients. The DUNS number will be used throughout the grant life cycle. Obtaining a DUNS number is a free, one-time activity. Call Dun and Bradstreet at 866–705–5711 to obtain a DUNS number or apply online at www.dnb.com. A DUNS number is usually received within 1–2 business days.

System for Award Management (SAM) Registration

Registering with the System for Award Management (SAM) is a required step in order for your organization to be able to apply for federal grants. SAM is a web-based, government-wide application that collects, validates, stores, and disseminates business information about the federal government's trading partners in support of the contract awards, grants, and electronic payment processes. SAM Registration is free – to register, go to the [SAM website](#) with the following information: Your agency's DUNS number and your Taxpayer Identification Number (TIN) or Employment Identification Number (EIN). **When you register a new entity in SAM to do business with the U.S. government**, SAM requires a notarized letter stating you are the authorized entity administrator before SAM will activate your entity registration in SAM.gov. Generally, after completing the online registration and sending your notarized letter confirming the entity administrator, it takes up to two weeks to register with SAM. However, your organization must first have an EIN. If your organization does not have an EIN, you should allow an additional 5 weeks to request and obtain an EIN from the IRS.

OVERVIEW OF VAWA STOP FORMULA GRANT PROGRAM

Mission: Violence Against Women Act Stop Formula Grant

The Violence Against Women Act (VAWA) *Services, Training, Officers, Prosecution* (STOP) Formula Grant Program supports communities in their efforts to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women and to develop and strengthen victim services in cases involving sexual assault, domestic violence, dating violence, & stalking.

Program Scope

The scope of the STOP Program is defined by the statutory purpose areas and the identified program activities.

Statutory Program Purposes

By statute, STOP Program grants are intended for use by states and territories; state, local, and tribal courts (including juvenile courts); Indian tribal governments; units of local government; and nonprofit, non-governmental victim services programs, including those of faith-based and community organizations. Grants and subgrants supported through this program **must** meet one or more of the following statutory purpose areas:

1. Training law enforcement officers, judges, other court personnel, and prosecutors to more effectively identify and respond to violent crimes against women, including the crimes of domestic violence, dating violence, sexual assault, and stalking including the use of nonimmigrant status under subparagraphs (T) and (U) of section 101(a)(15) of the Immigration and Nationality Act (8 U.S.C. 1101(a));
2. Developing, training, or expanding units of law enforcement officers, judges, other court personnel, and prosecutors specifically targeting violent crimes against women, including the crimes of sexual assault, dating violence, domestic violence, and stalking;
3. Developing and implementing more effective police, court, and prosecution policies, protocols, orders, and services specifically devoted to preventing, identifying, and responding to violent crimes against women, including the crimes of sexual assault, domestic violence, dating violence and stalking as well as the appropriate treatment of victims;
4. Developing, installing, or expanding data collection and communication systems, including computerized systems, linking police, prosecutors, and courts or for the purpose of identifying, classifying, and tracking arrests, protection orders, violations of protection orders, prosecutions, and convictions for violent crimes against women, including the crimes of domestic violence, dating violence, sexual assault, and stalking;
5. Developing, enlarging, or strengthening victim services and legal assistance programs, including domestic violence, dating violence, sexual assault, and stalking programs, developing or improving delivery of victim services to underserved populations, providing specialized domestic violence court advocates in courts where a significant number of protection orders are granted, and increasing reporting and reducing attrition rates for cases involving violent crimes against women, including crimes of sexual assault, domestic violence, dating violence and stalking;
6. Developing, enlarging, or strengthening programs addressing the needs and circumstances of Indian tribes in dealing with violent crimes against women, including the crimes of domestic violence, dating violence, sexual assault, and stalking;
7. Supporting formal and informal statewide, multidisciplinary efforts, to the extent not supported by state funds, to coordinate the response of state law enforcement agencies, prosecutors, courts, victim services agencies, and other state agencies and departments, to violent crimes against women, including the crimes of domestic violence, dating violence, sexual assault, and stalking;
8. Training of sexual assault forensic medical personnel examiners in the collection and preservation of evidence, analysis, prevention, and providing expert testimony and treatment of trauma related to sexual assault;
9. Developing, enlarging, or strengthening programs to assist law enforcement, prosecutors,

courts, and others to address the needs and circumstances of older and disabled women who are victims of domestic violence, dating violence, sexual assault, and stalking, including recognizing, investigating, and prosecuting instances of such violence or assault and targeting outreach and support, counseling, and other victim services to such older and disabled individuals;

10. Providing assistance to victims of domestic violence and sexual assault in immigration matters;
11. Maintaining core victim services and criminal justice initiatives, while supporting complementary new initiatives and emergency services for victims and their families;
12. Supporting the placement of special victim assistants (to be known as "Jessica Gonzales Victim Assistants") in local law enforcement agencies to serve as liaisons between victims of domestic violence, dating violence, sexual assault, and stalking and personnel in local law enforcement agencies in order to improve the enforcement of protection orders. Jessica Gonzales Victim Assistants shall have expertise in domestic violence, dating violence, sexual assault, and stalking and may undertake the following activities:
 - Developing, in collaboration with prosecutors, courts, and victim service providers, standardized response policies for local law enforcement agencies, including the use of evidence-based indicators to assess the risk of domestic and dating violence homicide and prioritize dangerous or potentially lethal cases;
 - Notifying persons seeking enforcement of protection orders as to what responses will be provided by the relevant law enforcement agency;
 - Referring persons seeking enforcement of protection orders to supplementary services (such as emergency shelter programs, hotlines, or legal assistance services); and;
 - Taking other appropriate action to assist or secure the safety of the person seeking enforcement of a protection order.
13. Providing funding to law enforcement agencies, nonprofit non-governmental victim services providers, and State, Tribal, Territorial, and local governments (which funding stream shall be known as the Crystal Judson Domestic Violence Protocol Program) to promote—
 - The development and implementation of training for local victim domestic violence service providers, and to fund victim services personnel, to be known as "Crystal Judson Victim Advocates," to provide supportive services and advocacy for victims of domestic violence committed by law enforcement personnel;
 - The implementation of protocols within law enforcement agencies to ensure consistent and effective responses to the commission of domestic violence by personnel within such agencies such as the model policy promulgated by the International Association of Chiefs of Police ("Domestic Violence by Police Officers: A Policy of the IACP, Police Response to Violence Against Women Project" July 2003); and
 - The development of such protocols in collaboration with State, Tribal, Territorial and local victim services providers and domestic violence coalitions.
 - Note: Any law enforcement, State, Tribal, Territorial, or local government agency receiving funding under the Crystal Judson Domestic Violence Protocol Program shall,

on an annual basis, receive additional training on the topic of incidents of domestic violence committed by law enforcement personnel from domestic violence and sexual assault nonprofit organizations and, after a period of two years, provide a report of the adopted protocol to the Department, including a summary of progress in implementing such protocol. As such, States and Territories are responsible for ensuring that each subrecipient receiving funds under this purpose area will receive the required annual training. States are also responsible for ensuring that subrecipients submit their two-year report to the Department. States and Territories must notify and provide OVW with a list of subrecipient awarded STOP funds under the Crystal Judson Domestic Violence Protocol Program.

14. Developing and promoting State, local, or tribal legislation and policies that enhance best practices for responding to domestic violence, dating violence, sexual assault, and stalking;
15. Developing, implementing, or enhancing Sexual Assault Response Teams (SARTs), or other similar coordinated community responses to sexual assault.
16. Developing and strengthening policies, protocols, best practices, and training for law enforcement agencies and prosecutors relating to the investigation and prosecution of sexual assault cases and the appropriate treatment of victims;
17. Developing, enlarging, or strengthening programs addressing sexual assault against men, women, and youth in correctional and detention settings;
18. Identifying and conducting inventories of backlogs of sexual assault evidence collection kits and developing protocols and policies for responding to and addressing such backlogs, including protocols and policies for notifying and involving victims;
19. Developing, enlarging, or strengthening programs and projects to provide services and responses targeting male and female victims of domestic violence, dating violence, sexual assault, and stalking, whose ability to access traditional services and responses is affected by their sexual orientation or gender identity, as defined in section 249(c) of title 18, United States Code; and
20. Developing, enhancing, or strengthening prevention and educational programming to address domestic violence, dating violence, sexual assault, and stalking, with not more than five (5) percent of the amount allocated to a State to use for this purpose.

VAWA STOP PROGRAM PRIORITIES

Federal VAWA STOP Program Priorities

In FY 2021, The Office on Violence Against Women (OVW) is interested in supporting the following priority areas identified below. In shaping their strategies for FY 2021, OVW encourages states and territories to develop and support projects that:

1. Reduce violent crime against women and promote victim safety through investing in law enforcement, increasing prosecution, and promoting effective prevention.
2. Empower victims to become survivors by growing them past their vulnerabilities to a place of self-sufficiency.
3. Increase efforts to combat stalking.

4. Address the specific challenges that rural communities face in responding to domestic violence, dating violence, sexual assault, and stalking.

Kentucky VAWA STOP Program Priorities

To view the current Kentucky STOP Implementation Plan, please select the link below:

[Kentucky 2017 to 2020 VAWA STOP Implementation Plan](#)

ELIGIBILITY AND REQUIREMENTS

APPLICANT ELIGIBILITY

Federal Guidelines and Kentucky Justice and Public Safety Cabinet, Grants Management Division, establish eligibility criteria that must be met by all organizations that receive VAWA funds. These funds are to be awarded to subrecipients only for providing services to victims of crime, or related technical and/or educational assistance in regards to violent crimes against women, through their staff. Each subrecipient organization shall meet the following requirements:

1. **Public or Nonprofit Organization.** To be eligible to receive VAWA funds, programs must be public or nonprofit organizations, or a combination of such organizations, and participate in activities that either assist victims of domestic violence, sexual assault, stalking or dating violence, or seek to enhance criminal justice response to these crimes.
2. **Record of Effective Services.** Applicants should demonstrate a record of providing effective services. This includes having the support and approval of its services by the community, a history of providing services in a cost-effective manner, and financial support from other sources.
3. **New Programs.** Those programs that have not yet demonstrated a record of providing services may be eligible to receive VAWA funding, if they can demonstrate that 50 percent of their financial support comes from non-federal sources.
4. **Program Match Requirements.** Program Match is required for this grant opportunity (see [General Financial Requirements and Instructions](#)).
5. **Volunteers.** In order to be eligible for VAWA funds, programs are required to utilize volunteers and accumulate at least 50 volunteer hours throughout a grant year. This requirement may be waived by Grants Management Division staff, if the program submits a volunteer waiver request form indicating its efforts to recruit and maintain volunteers, or otherwise demonstrates why circumstances prohibit the use of volunteers. Volunteer time used for this grant program will be documented according to the [General Financial Requirements and Instructions](#) in this document. Volunteers used on the project must be at least 18 years of age. Completion of background checks on potential volunteers is strongly encouraged.
6. **VAWA-funded Staff Training Requirement.** Project staff funded **in whole or part** by the VAWA STOP Grant must complete 12 hours of related training during the grant award period. Completed training will be documented on quarterly Progress Reports and supporting documentation held in subrecipient grant files.
7. **Promote Community Efforts to Aid Victims of Violence Against Women.** Subrecipients will commit to promotion, within the community, coordinated public and private efforts to aid 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 multi-disciplinary teams. Coordination efforts also include developing written agreements that contribute to better and more comprehensive services to victims, such as development of MOU's (Memorandum of Understanding). Coordination efforts qualify an organization to receive VAWA STOP funds, but are not activities that can be supported with VAWA funds.

8. **Help Victims Apply for Compensation Benefits.** Subrecipients providing direct services to victims are encouraged, but not required, to assist victims in applying for compensation benefits. Such assistance may include identifying and notifying victims of the availability of compensation, assisting them with application forms and procedures, obtaining necessary documentation, and/or checking on claim status.
9. **Comply with Federal Rules Regulating Grants.** Subrecipients must comply with the applicable provisions of VAWA, and the requirements of the [USDOJ OVW Grants Financial Management Guide](#) (effective edition), which includes maintaining appropriate programmatic and financial records that fully disclose the amount and disposition of VAWA funds received.

This includes: financial documentation for disbursements; expense invoices; daily time and attendance records specifying time devoted to allowable VAWA victim services or other activities; client files; the portion of the project supplied by other sources of revenue; job descriptions; contracts for services; and other records which facilitate an effective audit.

10. Maintain Civil Rights Compliance.

- a. **Maintain Required Demographic Information:** Subrecipients providing direct services to victims must maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age, and disability, within the timetable established by the Kentucky Justice and Public Safety Cabinet, Grants Management Division; and permit reasonable access to its books, documents, papers, and records to determine whether the subrecipient is complying with applicable civil rights laws. This requirement is waived when providing a service, such as telephone counseling, where soliciting the information may be inappropriate or offensive to the crime victim.
- b. **Maintain Compliance with Equal Employment Opportunity Act Requirements:** Applicants and subrecipients must understand and maintain compliance with requirements to submit an Equal Employment Opportunity Plan or documentation of exemption
 - i. Applicants and subrecipients should maintain and submit an Equal Employment Opportunity Policy with all applications for funding as a condition of award from the Kentucky Justice and Public Safety Cabinet, Grants Management Division.
 - ii. Applicants and subrecipients are also required to evaluate and fulfill all federal Equal Employment Opportunity requirements by completing and fulfilling the [Office of Justice Program's Instructions on Complying with the EEOP Requirement](#).
- c. **Provide Meaningful Access to Limited English Proficient Individuals:** Those receiving assistance from the federal government must take reasonable steps to ensure that Limited English Proficient (LEP), and also deaf or hard of hearing persons, have meaningful access to the programs, services, and information those entities provide. This will require agencies to develop creative solutions to address the needs of this

population of individuals whose primary language is not English, and provide a copy of their agency Policies and Procedures to ensure meaningful access to language assistance with their application. The Justice and Public Safety Cabinet strongly recommends a funded Agency's LEP Policy conforms to the [Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs](#).

11. Comply with State Criteria. Subrecipients must abide by any additional eligibility or service criteria as established by the Kentucky Justice and Public Safety Cabinet, Grants Management Division including submitting statistical and programmatic information on the use and impact of VAWA funds, as requested by the grantee. These additional criteria may be outlined in Grants Management Division Policies and Procedures, Grant Guidelines, and Special Conditions of the Application or Award.

12. Services to Victims of Federal Crimes. Subrecipients providing direct services to victims must provide services to victims of federal crimes on the same basis as victims of state/local crimes.

13. No Charge to Victims for VAWA-Funded Services. Subrecipients providing direct services to victims must provide services at no charge, through the VAWA-funded project. Any deviation from this provision requires prior approval by the Kentucky Justice and Public Safety Cabinet, Grants Management Division. Prior to authorizing subrecipients to generate income, Kentucky Justice and Public Safety Cabinet will carefully weigh the following considerations regarding federal funds generating income for subrecipient organizations:

- a. The purpose of the VAWA STOP grant program is to provide services to all victims regardless of their ability to pay for services rendered or availability of insurance or other third-party payment resources. Victims suffer tremendous emotional, physical, and financial losses. It was never the intent of VAWA to exacerbate the impact of the crime by asking the victim to pay for services.
- b. Program income can be problematic because of the required tracking systems needed to monitor VAWA-funded income and ensure that it is used only to make additional services available to crime victims. For example: VAWA often funds only a portion of a counselor's time. Accounting for VAWA program income generated by this counselor is complicated, involving careful record keeping by the counselor, the subrecipient program, and the state.

Any income generated as a direct result of program related activities constitutes program income. All income generated by the program must be spent for service related expenses and reported on the appropriate financial report. Monthly/quarterly federal funds requests will be reduced dollar for dollar by any unexpended program income for that period.

14. Client-Counselor Confidentiality. Subrecipients providing direct services to victims must maintain confidentiality of client-counselor information, as required by state and federal law.

15. Confidentiality of Statistical and Research Information. Except as otherwise provided by federal law, no recipient of monies under VAWA shall use or reveal any statistical information furnished under this program by any person and identifiable to any specific private person for any purpose other than the purpose for which such information was obtained in accordance with VAWA. Such information, and any copy of such information,

shall be immune from legal process and shall not, without the consent of the person furnishing such information, be admitted as evidence or used for any purpose in any action, suit, or other judicial, legislative, or administrative proceeding. See Section 1407(d) of VAWA codified at 42 U.S.C. 10604.

These provisions are intended, among other things, to ensure the confidentiality of information provided by victims to counselors working for victim services programs receiving VAWA funds. Whatever the scope of application given this provision, it is clear that there is nothing in VAWA or its legislative history to indicate that Congress intended to override or repeal, in effect, a state's existing law governing the disclosure of information which is supportive of VAWA's fundamental goal of helping crime victims. For example, this provision would not act to override or repeal, in effect, a state's existing law pertaining to the mandatory reporting of suspected child abuse.

16. Victim Safety. Ensuring victim safety is a guiding principle underlying this Program. Experience has shown that certain practices may compromise victim safety rather than enhance it. Certain responses by the authorities may have the effect of minimizing or trivializing the offender's criminal behavior. Accordingly, consistent with the goals of ensuring victim safety while holding perpetrators accountable for their criminal conduct, applicants are strongly discouraged from proposing projects that include any activities that may compromise victim safety, such as the following:

- offering perpetrators, the option of entering pre-trial diversion programs;
- requiring mediation or counseling for couples as a systemic response to domestic violence or sexual assault;
- requiring victims to report sexual assault, stalking, or domestic violence crimes to law enforcement or forcing victims to participate in criminal proceedings;
- court mandated batterer intervention programs that do not use the coercive power of the criminal justice system to hold batterers accountable for their behavior;
- placing of batterers in anger management programs; or,
- procedures that would penalize victims of domestic violence for failure to testify against their abusers or impose other sanctions on them.

17. Unallowable Activities. Grant funds under the STOP Program may not be used for any unauthorized purposes, including but not limited to the following activities:

- Lobbying; (except with explicit statutory authorization)
- Fundraising;
- Purchase of real property;
- Physical modifications to buildings, including minor renovations (such as painting and carpet)
- Construction;
- Research projects;
- Automobiles;
- Immigration fees;

- Unallowable budget items are further detailed in the General Financial Requirements and Instructions.

18. Consultation with Victim Services. Prosecution, law enforcement, and court programs must consult with victim services during the course of developing their grant applications to ensure that the proposed activities promote safety, confidentiality and economic independence of victims. Verification of consultation must be referenced in your required letter(s) of support.

19. Faith-based Organization Personnel Practices. Faith-based organizations asserting hiring practices on the basis of religion must download, complete, and sign a Certification of Exemption form located on the Kentucky Justice and Public Safety Cabinet website, https://justice.ky.gov/Documents/Medical%20Examiners/fbo_sample.pdf and upload it to the application.

20. Determination of Suitability for Interacting with Participating Minors: If a purpose of some or all of the activities to be carried out by the grant project is to benefit a set of individuals under 18 years of age, the subrecipient may not permit any individual (other than a client, another participating minor, or another individual reasonably likely to only have brief and unintentional or personally-accompanied contact) to interact with any participating minor (individual under 18 years of age receiving services as part of this project) without first making a written determination of the suitability of that individual to interact with participating minors, based on current and appropriate information. See <https://www.ojp.gov/funding/explore/interact-minors> for details of this federal requirement.

21. Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence. A recipient, and any subrecipient at any tier, must have a policy, or issue a policy within 270 days of the award date, to address workplace-related incidents of sexual misconduct, domestic violence, and dating violence involving an employee, volunteer, consultant, or contractor. The details of this requirement are posted on the OVW web site at <https://www.justice.gov/ovw/award-conditions>.

ADDITIONAL CONSIDERATIONS

- Recognizing that a majority of victims of sexual assault, domestic violence, dating violence, and stalking are women, this grant opportunity is named the Violence Against Women Act STOP Formula Grant. However, services can also be provided to male-identified and non-binary individual victims of these crimes.
- Children’s services supported with the funds must be the direct result of providing services to an adult primary victim. VAWA grant funds may not be used to support services that focus exclusively on youth, or to develop sexual assault or domestic violence prevention curricula for schools.
- Applicants are required to exhibit collaborative efforts of victim services among those agencies benefiting from the funding.

GENERAL FINANCIAL REQUIREMENTS AND INSTRUCTIONS

Grants funded under the VAWA STOP Formula Grant Program are governed by the financial requirements of the following:

- Uniform Guidance: 2 CFR Part 200
<https://www.govinfo.gov/app/details/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200>
- U.S. Department of Justice, 2017 Grants Financial Guide
<https://www.justice.gov/ovw/file/1030311/download>
- Grants Management Branch Policy and Procedures Manual
<https://justice.ky.gov/Documents/Grants%20Management/GMD%20Manual%204-20-20.pdf>
- Finance and Administration Cabinet, Finance Policies
<http://finance.ky.gov/services/policies/Pages/default.aspx>

All VAWA STOP awards funded through the Grants Management Division will be made on a reimbursable basis. Requests for reimbursement may be submitted on a quarterly or monthly basis. Reimbursement payments may be delayed if subrecipients do not adhere to program and financial reporting requirements.

Sound Financial Management

All subrecipients are required to establish and maintain accounting systems and financial records to accurately account for awarded funds. These records shall include federal funds and all matching funds of state, local, and private organizations, when applicable. Subrecipients shall expend and account for grant funds in accordance with federal and state laws, and procedures for expending and accounting for their own funds. A financial capability questionnaire must be completed and submitted by all new applicants:

<http://ojp.gov/funding/Apply/Resources/FinancialCapability.pdf>. This form may be uploaded into IGX in the attachments section.

Accounting System

As a subrecipient, you must have a financial management system in place able to record and report on the receipt, obligation, and expenditure of grant funds. You should keep detailed accounting records and documentation to track all of the following information:

- Federal funds awarded
- Matching funds of state, local, and private organizations, when applicable
- Program income
- Contracts expensed against the award
- Expenditures

What Is an Adequate Accounting System?

An adequate accounting system can be used to generate reports required by award and Federal regulations. Your system must support all of the following:

- Financial reporting that is accurate, current, complete, and compliant with all financial reporting requirements of your award. Accounting systems should be able to account for award funds separately (no commingling of funds).
- An adequate accounting system allows you to maintain documentation to support all receipts and expenditures and obligations of Federal funds.
- An adequate accounting system collects and reports financial data for planning, controlling, measuring, and evaluating direct and indirect costs.

Your system should have all of the following capabilities:

- **Internal control.** Your system should allow you to exercise effective control and accountability for all cash, real and personal property, and other assets. As a sub-recipient, you must adequately safeguard all such property and assure that it is used solely for authorized purposes. Please consult 2 C.F.R. § 200.303 for additional information.
- **Budget control.** Your system should let you compare actual expenditures or outlays with budgeted amounts for each award. It also must relate financial information to performance or productivity data, including the development of unit cost information whenever appropriate or specifically required in the award agreement.
- **Allowable cost.** Your system should support you in making sure that you follow Federal cost principles, agency program regulations, and the terms of grant agreements in determining the reasonableness, allowability, and allocability of costs.

Source documentation. Your system should require you to support accounting records with source documentation (e.g., canceled checks, paid bills, payrolls, time and attendance records, and contract and subgrant award documents).

An adequate accounting system for a recipient must be able to accommodate a fund and account structure to separately track receipts, expenditures, assets, and liabilities for awards and programs.

Supplanting

Supplanting is defined as deliberately reducing state or local funds because of the existence of Federal funds.

Federal funds must be used to supplement existing state and local funds for program activities and must not supplant those funds that have been appropriated for the same purpose. Federal law prohibits recipients of federal funds from replacing state, local, or agency funds with federal funds. Existing funds for a project and its activities *may not* be displaced by federal funds and reallocated for other organizational expenses.

Potential supplanting will be the subject of the application review, pre-award review, post-award monitoring, and possible audit. If there is potential supplanting, the applicant/subrecipient will be

required to supply documentation demonstrating that the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

Funds specifically budgeted and/or received for one project may not be used to support another. Where a subrecipient's accounting system cannot comply with this requirement, the subrecipient shall establish a system to provide adequate fund accountability for each project it has been awarded.

Proration of Costs. Applicants that conduct both allowable and unallowable activities must reasonably prorate their costs to ensure that VAWA STOP funds and match (both cash and in-kind) are used only for direct services to victims. This proration must be explained within the budget narrative.

Use Of Funds Within Intended Purpose Areas

Funds subawarded to an eligible program must be spent to provide services to victims of sexual assault, domestic and dating violence, and stalking, or to improve criminal justice response to these crimes as described above in "Program Purpose Areas."

Please Note: **Forensic medical exams** for sexual assault victims must be free of charge for those victims. Victims can be asked to submit the exam charge to their health insurance; however, they are not to be charged any copayments and/or deductible costs, and may not be billed for any related costs.

Administrative/Indirect Costs

Applicants may request indirect costs under this funding opportunity. Indirect Costs are those costs incurred by the subrecipient in support of general business operations but which are not attributable to a specific federally funded project. Typically examples of indirect costs for most organizations will include the costs of operating and maintaining facilities and general administration such as salaries and expenses of executive officers, human resources administration, and accounting personnel.

Non-federal organizations that currently have a negotiated indirect cost rate agreement with a federal agency may request indirect costs; however, the organization must use the current negotiated rate. A copy of the approved negotiated indirect cost rate agreement letter from the cognizant federal agency must be uploaded with the application.

Non-federal organizations that have never had a negotiated indirect cost rate agreement may use the ten (10%) rate of the organization's Modified Total Direct Costs (MTDC), also known as the *de minimis* indirect cost rate. MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services and travel. MTDC excludes equipment, capital expenditures, charges for patient care, tuition remission, scholarships and fellowships, and participant support costs.. Calculate 10% of the costs included under the allowed budget costs. This is your *de minimis* rate of 10% Modified Total Direct Costs. Please see 2 CFR 200.68 for more information on MTDC.

Applicants should consult with their CPA or other financial professional to determine the amount of MTDC if the agency chooses to apply the *de minimis* rate.

Fundraising:

Costs of organized fund raising, including financial campaigns, solicitation of gifts and similar expenses solely to raise capital or obtain contributions, may not be charged as costs against the grant. Neither the salary of persons engaged in such activities nor indirect costs associated with those salaries may be charged to the grant. Nothing in this section should be read to prohibit a subrecipient from engaging in fund raising activities, as long as such activities are not financed by federal or match grant funds.

Liability Insurance

Agency liability insurance is considered to be an incidental expense, and may not be charged to the VAWA grant. Professional liability insurance, such as for a nurse or therapist, is an allowable expense.

IGX SYSTEM INFORMATION FOR VAWA APPLICATION

Guidelines and Instructions: Applicants are encouraged to read and understand the guidelines and instructions prior to preparing the application to become familiar with the requirements and restrictions regarding the use of funds. Use this information in the development of your project proposal. Please contact GMD staff if further clarification or assistance is required. *Guidelines and/or Instructions may vary from year to year, and applicants need to review these prior to beginning the application.*

Agency Overview: Provide a description of the agency implementing the project. Include the mission statement and a list of grant funded project staff.

Contact Information: This page should describe those individuals that are eligible to serve as designated grant officials.

- **Authorized Official/Agency Representative/CEO:** The person authorized to apply for, accept, decline, or cancel the grant on behalf of the applicant's organization (e.g. state agency head, county judge executive, executive director, etc.).
- **Project Director/Agency Administrator:** The individual who will be responsible for the day-to-day operation of the project.
- **Financial Officer:** Chief financial officer of the applicant's organization. This individual will be responsible for all the financial aspects of the grant's management and should not be assigned multiple roles on the project to ensure segregation of duties.

General Information: Includes the following:

- Project Title
- Number of years the agency has previously received VAWA funding
- Employer identification number (EIN),
- DUNS number
- Grant period

- Agency type
- Brief abstract of the proposed project

Certifications: Certifications regarding lobbying, debarment, suspension, and other responsibility matters as well as drug-free workplace requirements.

Equal Employment: Applicants are asked to view the PowerPoint presentation from the Office of Civil Rights, U.S. Department of Justice before checking the applicable boxes at the bottom of the page and uploading the required documents.

Audit Requirements: Non-federal entities that expend \$750,000 or more in federal funds (from all sources including pass-through sub-awards) in the organization fiscal year (12 month reporting period) shall have a single organization audit conducted in accordance with the provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Non-federal entities that expend less than \$750,000 per year in federal awards are exempt from federal audit requirements for that year. A financial audit may be required for any project expending more than \$100,000. Records must be available for review by appropriate officials including the federal agency, Justice and Public Safety Cabinet, Grants Management Branch, and the General Accounting Office (GAO). A copy of the most current audit report and any management letter(s) are required with the submission of the grant application. Future audits are due no later than nine (9) months after the close of each fiscal year during the term of the award.

Determination of Suitability for Interacting with Participating Minors: An Applicant must provide the information requested on this page if a purpose of some or all of the activities to be carried out by the grant project is to benefit a set of individuals under 18 years of age, the subrecipient may not permit any individual (other than a client, another participating minor, or another individual reasonably likely to only have brief and unintentional or personally-accompanied contact) to interact with any participating minor (individual under 18 years of age receiving services as part of this project) without first making a written determination of the suitability of that individual to interact with participating minors, based on current and appropriate information. See <https://www.ojp.gov/funding/explore/interact-minors> for details of this federal requirement.

Statutory Requirement to Comply with the Confidentiality and Privacy Provisions of the Violence Against Women Act, as Amended: On this page, the Applicant must acknowledge it is familiar with and will comply with the confidentiality and privacy provisions of the Violence Against Women Act.

Area Served: Indicate Area Development District(s) and county(ies) served by applicant organization.

Limited English Proficiency: The federal government and those receiving assistance from the federal

government must take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have access to the programs, services, and information that those entities provide. Agencies must establish and implement policies and procedures for language assistance services that provide LEP persons with meaningful access at no additional charge.

BUDGET PREPARATION

General Instructions

- Budget forms must be completed in detail, with amounts rounded to the nearest whole dollar.
- When preparing a proposed budget, please keep in mind all five budget categories: *Personnel, Contractual Services, Travel/Training, Operating Expenses, and Equipment.*
- Consider program goals and objectives and design the budget so that it best suits the overall effectiveness of the program.
- When preparing your budget, please consider the following questions for each requested expenditure – Is it **allowable**? Is it **reasonable**? Is it **necessary**?
- Budget revisions may be required later based on availability of funds or expenses not allowable under VAWA.
- You must provide information concerning the source of your agency's matching contributions. It is important for Grants Management Division to know the actual funding sources that are being identified with the VAWA funded project.
- At the end of the budget section, applicants for grants must submit a budget narrative. The budget narrative should detail by budget category, federal share and non-federal cash and in-kind match items. The purpose of the budget narrative is to relate items budgeted to project activities and to provide justification and explanation for budget items, including criteria and data used to arrive at the estimates for each budget category. **DO NOT SIMPLY RESTATE THE BUDGET.**
- Travel/Training and Operating Expenses require a method of computation for each request (e.g., travel—purpose, destination, lodging, mileage rates and per diem rates; operating expenses--rent, total square feet, space requirements per VAWA staff person, total agency costs, allocation percentage).
- A budget checklist is provided at the end of this section to assist in completing the VAWA application.

Budget Categories. The following is an overview of the allowable categories associated with VAWA STOP Formula Grant Program funds.

PERSONNEL

Salary and Fringe Benefits. Staff salaries and fringe benefits are allowable when specifically related to providing direct services to victims. VAWA funds may be used to support administrative time to complete VAWA required time and attendance sheets, programmatic documentation, reports and statistics; and to maintain crime victims' records.

- Each position must be listed by job title and name of employee [or to be determined (TBD) or vacant], total monthly gross salary rate for the employee, the percentage of the employee's time devoted to the project and total employee cost for the project.
 - a. Where salaries apply to both project and non-project activity or apply to two or more separate projects or funding sources, pro-ration of costs to each activity must be made based on time and attendance reports.
 - b. Salaries for federally funded and match positions shall comply with state, city, county, or other relevant classification systems and shall be documented by appropriate time and attendance records.
 - c. Charges of the employees' time assigned to grant projects may be reimbursed or recognized only to the extent they are directly and exclusively related to grant purposes.
 - d. Dual compensation is not allowed.
- Funded part-time positions (positions devoting less than 100% of a standard work shift to the grant project) should be supported by a brief explanation of the employee's duties outside the grant project or by a statement that the employee is not employed elsewhere by the grantee. The employee's timesheets shall indicate such separation of time worked.
- Attach job description and resume of VAWA Project Staff (or a placeholder document for unfilled or proposed new Staff positions).
- Payments for fringe benefits are allowable personnel costs but cannot exceed the amount paid by the employer. The fringe benefits must be reasonable and in line with state, city or county rates. Each type of employee benefit should be listed along with the total cost allowable to employees assigned to the project. Documentation of fringe benefits must be submitted with the budget to reflect the actual rates being paid by the employer. The following are considered allowable benefits:
 - a. Health, Dental and Life Insurance, (Single Plan only)
 - b. FICA
 - c. Retirement
 - d. Worker's Compensation
 - e. Unemployment Insurance

Exclusions – Personnel. The following **cannot** be funded or used as match:

- Clerical volunteer hours, except for activities that fall under a statutory Purpose Area and are approved in the original application as essential to the project.
- Salary and/or benefits that are greater than documented percentage of time spent on VAWA allowable activities. If employee works on multiple projects, they must keep allocated timesheets.
- Crisis line time if not supported by a time log, including the initials of the individual who took the call OR agency policies that require a crisis line staff/volunteer to be immediately available to accept calls at a designated number for a designated period of time.
- Any activities that have a primarily recreational purpose.

- General informational presentations to the public with a primary purpose of prevention. Informational presentations must be primarily geared toward professionals, or to conducting outreach with target populations to notify them of services available through the grant project.
- Fundraising activities.
- Criminal record background checks.
- Lobbying activities.
- Bonuses.
- Job placement services. Case management and crisis counseling which discusses employment issues or makes referrals to job placement/counseling services is allowable.
- For additional information, visit the U.S. Department of Labor Wage and Hour Division Website: www.wagehour.dol.gov

Supporting Documentation Required – Personnel. Timesheets must be maintained and submitted for all grant funded personnel. These timesheets must:

- a. Reflect an after-the-fact accounting of the total activity and hours worked for which the employee is compensated and indicate the specific time worked on the VAWA-funded project. For example, a full-time employee working 40 hours per week reports 15 hours on the VAWA-funded project and 25 hours worked on other activities. 37.5% of the employee’s salary for the week may be paid with VAWA funds.
- b. Be prepared at least monthly and coincide with one or more pay periods.
- c. Include original signatures of the employee and approving supervisory official having firsthand knowledge of the work performed.
 - Documentation must reflect the actual rates being paid by the employer.
 - Documentation of fringe benefits reflecting the actual costs paid by the employer.

Volunteers. Subrecipients are required to contribute 50 volunteer hours regardless whether or not the hours are used as In-Kind match. In extenuating circumstances, a waiver of this requirement may be granted at Grants Management Division discretion.

- Volunteer hours must be supported by timesheets indicating activity and hours worked, with original signatures of both the volunteer and one agency staff member.
- All volunteer time utilized as In-Kind Match on the grant must be related to VAWA-allowable activities described in the grant.
- Volunteers must be at least 18 years of age and be performing professional duties related to the grant project. Completion of background checks on potential volunteers is strongly encouraged.
- Please do not use the volunteer rate from an internet site or one rate for all types of volunteer activities. The assigned rate should be based on what the agency would pay were the individual employed full time. An hourly rate is determined by the salary plus any applicable fringe benefits.

Overtime

Overtime pay can be funded for personnel funded by the grant on a full-time basis, whose duties are consistent with the VAWA-funded project. **Overtime pay must be approved through the original grant application. Grants Management Division approval must be obtained before overtime pay can be reimbursed.**

Rule for legal assistance: For 2014 funds and later, VAWA funds can be used to pay for divorce, visitation, support, including temporary housing, etc. that require legal assistance.

Required qualifications for prosecutor-based advocates: By statute KRS 69.350, an individual employed as a victim advocate shall be a person who, by a combination of education, professional qualification, training and experience, is qualified to perform the duties of this position. The victim advocate shall be an individual at least eighteen (18) years of age, of good moral character, with at least two (2) years of experience working in the human services field or court system in a position requiring professional contact with adults, who has:

- Received a baccalaureate degree in social work, sociology, psychology, guidance and counseling, education, religion, criminal justice or other human service field; or
- Received a high school diploma or equivalency certificate, and, in addition to the experience required in this subsection, has at least four (4) years experience working in the human services field (H.B. 315, for prosecutor based advocates only).

CONTRACTUAL SERVICES

Compensation for individual consultant services shall be reasonable and consistent with that paid for similar services in the market place. Individual consultant rates cannot exceed \$650 per day (or \$81.25 per hour). An 8-hour day may include preparation, evaluation and travel time in addition to the time required for the actual performance. Additionally, travel and subsistence costs may be paid. Any request for compensation for over \$650 per day requires prior approval and additional justification

Contractual Arrangements with individuals must ensure that:

- A. Dual compensation is not involved (i.e., the individual may not receive compensation from his regular employer and the applicant for work performed during a single period of time even though the services performed benefit both).
- B. The contractual agreement is written, formal, proper and otherwise consistent with the applicant's usual practices.
- C. Time and/or services for which payment will be made and rates of compensation must be supported by adequate documentation.

- D. Travel and subsistence costs are at an identified rate consistent with the cost allowed in Section III, Travel.

Supporting Documentation Required – Contractual Services. Time and/or services for which payment will be made and rates of compensation must be supported by adequate documentation.

- A copy of the fully executed contractual agreement.
- Invoices for payment, if applicable.
- Receipts for travel and subsistence costs, if applicable.

TRAVEL/TRAINING

Training costs for persons (salaried or volunteer staff) who are identified as part of the VAWA project staff is allowable. Allowable use of VAWA funds is limited to staff development of direct service providers in individual projects to enhance their skills directly related to the program purpose area. Management training is not eligible.

NOTE: Whether or not training costs are included in the budget under the grant application, all project staff funded by VAWA, whether full time or part time, must complete 12 hours of related training during the award period.

- VAWA funds may be used for transportation, subsistence, and registration fees for applicants to attend conferences and training seminars.
- Each training request must include specific details, essentially the five Ws – **Who** is attending? **What** kind of training? **When** and **where** is it? And **why** is it necessary? (Please include the purpose, destination, lodging, mileage rates, and per diem.)
- Travel must be approved through the original grant application or through a subsequent Grant Adjustment Notice (GAN).
- Registration fees required for admittance to official travel meetings are reimbursable. If the fee entitles registrants to meals, claims for subsistence must be reduced accordingly.
- Requested travel expenses shall not exceed the established mileage and subsistence policy as set forth by the Commonwealth of Kentucky, Finance and Administration Cabinet. Please see <https://finance.ky.gov/services/statewideacct/Pages/travel.aspx> and also 200 KAR 2:006 for current rates and regulations.
- Transportation must be the most economical.
 - a. Bus, subway and taxi fares (and also Lyft/Uber) are allowed for city travel.
 - b. Commercial airline travel shall be coach/tourist class.
 - c. The cost of rental cars in lieu of ordinary transportation will be allowed only with acceptable justification.
 - d. Actual parking, bridge, and toll charges are reimbursable.
 - e. Reasonable expenses for baggage handling, for delivery to or from a common carrier, or lodging and for storage are reimbursable.

Exclusions – Travel and Training. The following **cannot** be funded or used as match:

- Management training.
- Telephone, tips, and laundry charges.
- Additional expense for first class travel.

Supporting Documentation – Travel and Training. All expenses shall be supported by itemized receipts and/or detailed travel logs.

NOTE: If the travel and reimbursement requirements of the applicant agency are more restrictive than that of the Commonwealth, the more restrictive of the two must be followed.

OPERATING EXPENSES

Operating expenses include items necessary and essential for the ongoing operation of the project. Items must be individually listed in the budget and approved through the original grant application or in subsequent grant adjustment notices prior to the actual expense. Allowable operating costs include, but are not limited to:

- Advertising to recruit VAWA-funded personnel
- Program Supplies
- Books, training manuals and videos for direct service providers
- Rent for the space used by the program
- Utilities, Telephone and Security for the space used by the program whether owned, rented, or donated
- Printing and distribution of brochures, pamphlets and similar announcements describing the direct services available and how they may be obtained
- Brochures, pamphlets, and other printed materials shall include an acknowledgement of agency assistance and/or support printed conspicuously in the publication. Such statements may be made through use of the following footnote: "This project was supported by Grant No. (*insert correct grant number*) awarded through the Kentucky Justice and Public Safety Cabinet by the U. S. Department of Justice, Office of Justice Programs."
- Office Supplies
- Postage
- Equipment usage fees supported by usage logs
- Supplies, defined as items with a unit price of less than \$5,000, including computing devices regardless of useful life.

Additional instructions:

- Operating Expenses require a method of computation for each request, e.g., rent, total square feet, space requirements per **VAWA** staff person, total agency costs, allocation percentage, etc.
- Items must be listed individually and submitted through the original grant application or the Grant Adjustment Notice (GAN) prior to the actual expense.

- Items should be listed by category, e.g., office supplies, training materials, telephone, postage, etc.
- Large items should be listed separately and identified, e.g., unusual supply items, special printing or mailings required for project, etc.
- Miscellaneous items should be itemized.
- Indicate how funds are to be allocated if used as match or partially funded by the grant.
- The budget narrative should be used to indicate the basis for computation (i.e.: “x” dollars per month for office supplies, “y” dollars per person for training materials, “z” dollars per month for telephone-long distance telephone service, etc.)

Exclusions – Operating Expenses. The following **cannot** be funded or used as match:

- If the applicant agency or a related party owns the space used by the program, the fair market rental value of the space cannot be used as match or reimbursed under the federal share.
- In-kind rent when not supported by a recent, written fair market rental value estimate from a real estate professional or landlord.
- Other costs such as liability insurance on buildings, capital improvements, property losses and expenses, mortgage payments, real estate purchases, construction.
- Janitorial, cleaning, and/or lawn care supplies.
- “Gas cards” or comparable gift cards whose usage / expenditures cannot be tracked
- Some law enforcement equipment, such as uniforms, safety vests, shields, weapons, bullets, and armory.
- Household items not specifically identifiable to the immediate crisis period.
- Equipment repair and maintenance for any item not purchased with VAWA funds, excluding allocated copy contracts that include toner, supplies, etc.
- Audit costs, even if required under federal guidelines.
- Accounting services.
- Tax preparation fees.

Supporting Documentation – Operating Expenses. Operating expenses shall be supported by invoices and proof of payment to the vendor/supplier.

EQUIPMENT

Unless the applicant’s own policies regarding capitalization are more restrictive, this category includes items with a unit price of \$5,000 or more and a useful life greater than one year, e.g. furniture, fixtures, office machines, etc.

NOTE: Items with a unit price less than \$5,000 and less than one-year useful life should be placed in the “Operating Expenses” category.

The applicant must adhere to the following principles:

- Items of equipment must be individually listed and approved through the original grant

- application or in subsequent GANs prior to purchasing the equipment.
- No other equipment owned by the applicant is suitable for the effort.
 - Equipment purchased and used commonly for two or more programs has been appropriately prorated to each activity.
 - Authorization for equipment will be based on the applicant's demonstration that the requested equipment is necessary to the successful operation of the project.

Exclusions – Equipment. The following **cannot** be funded or used as match:

- Equipment or capital expenditures not determined to be necessary and essential to the delivery of direct service by OVW or Grants Management Division.
- Reimbursement for equipment already owned by the applicant or purchased through another funding source.

Supporting Documentation – Equipment. Equipment purchases shall be supported by invoices and proof of payment to the vendor/supplier.

Procurement Procedures

Applicants shall use the procurement procedures and regulations as set forth by the Commonwealth of Kentucky, Finance and Administration Cabinet. Please see <http://finance.ky.gov/services/eprocurement/Pages/default.aspx> or KRS Chapter 45A for more information.

NOTE: If the procurement policy of an agency is more restrictive than the Commonwealth's, the more restrictive of the two must be followed.

BUDGET NARRATIVE AND SUMMARY

Budget Narrative. Applicants must submit a budget narrative. The narrative should detail by category the federal and non-federal (cash and in-kind) shares. The purpose of the budget narrative is to relate items budgeted to project activities and to provide justification, explanation, and calculations for budget items, including criteria and data used to arrive at the estimates for each budget category.

Budget Summary. The budget summary is automatically populated using the aggregate costs identified in each of the budget categories. An error message will be shown if the match percentage is insufficient.

MATCHING REQUIREMENT

The purpose of matching contributions is to increase the amount of resources available to the projects supported by grant funds. Matching contributions of 25% (cash or in-kind) of the total cost of each VAWA project (VAWA grant plus match) are required for VAWA-funded projects and must be derived from nonfederal sources, except as provided in the [U.S. Department of Justice, Grants Financial](#)

[Management Guide](#). All funds designated as match are restricted to the same uses as the VAWA STOP funds and must be expended within the grant period. Match must be provided on a project-by-project basis.

Cash Contributions represent an applicant's cash outlay, including non-federal money contributed by public agencies and institutions, and private organizations and individuals. These items must be encumbered within the grant period.

In-Kind Contributions represent the value of non-cash contributions provided by the applicant. In-kind contributions may be in the form of charges for real property and nonexpendable personal property and the value of goods and services specifically identifiable to the project.

- a. In-kind match may include donations of expendable equipment, office supplies, project supplies, workshop or classroom materials, work space, or the monetary value of time contributed by professionals and technical personnel and other skilled and unskilled labor, if the services they provide are an integral and necessary part of a funded project.
- b. The value placed on donated services must be consistent with the rate of compensation paid for similar work in the subrecipient's organization. If the required skills are not found in the subrecipient's organization, the rate of compensation must be consistent with the labor market. In either case, fringe benefits may be included in the valuation.
- c. The value placed on loaned or donated equipment may not exceed its fair market value.
- d. The value of donated space may not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in privately-owned buildings in the same locality.
- e. Donated project supplies can include clothing and other goods for emergency service provision, in accordance with the following stipulations
 - Donated goods must be valued officially, using a source like the Salvation Army Donation Value Guide
 - Only \$1000 per year of donated goods can be applied as in-kind match
 - Donated goods applied as in-kind match must support VAWA-allowable service provision
 - Donated goods applied as in-kind match cannot later be sold for fundraising purposes.

In grants awarded in previous years, it has been noted that some subrecipients have designated a substantial portion of their project budget as match. Applicants should be mindful that any funds designated as matching funds for VAWA dollars are restricted to the uses outlined in the application.

Any additional match included will become a required element of the project and may affect the award if it is not met. Subrecipients must maintain records which clearly show the source, the amount, and timing of all matching contributions.

Record Keeping. VAWA recipients and their subrecipients must maintain records that clearly show the source, the amount, and the period during which the match was allocated. The basis for determining

the value of personal services, materials, equipment, and space must be documented. Volunteer services must be documented, and to the extent feasible, supported by the same methods used by the subrecipient for its own paid employees.

Exceptions to the 25% Match. Consistent with OVW guidelines and requirements, matching funds may be waived for certain programs which provide direct victim services, if funded under the Victim Services category. Grants Management Division maintains discretion to award projects by funded categories, consistent with federal VAWA guidelines. Eligible programs will be advised by Grants Management Division upon award if their match requirement is waived. Grants Management Division may request additional waivers of the match requirement from the Office on Violence Against Women if extraordinary circumstances are documented.

Match Calculation. Please use the following to determine your match requirement:

- 25% of Total Project Cost (regardless of the number of years having received VAWA funds).
- Match formula:
 - Federal Share Requested/(1-% Match Requirement) = Total Project Cost
 - Total Project Cost – Federal Share = Match Requirement OR
 - Total Project Cost * Match % = Match Requirement Example:
- \$30,000 federal share
 - $\$30,000 / (1 - .25)$ or $.75 = \$40,000$ total project cost
 - $\$40,000 - \$30,000 = \$10,000$ match OR
 - $\$40,000 * .25 = \$10,000$ matching contributions can be either cash, in-kind, or both.

APPLICATION CRITERIA AND REVIEW PROCESS

When a completed application has been submitted, it shall be subject to programmatic and financial review. This includes an overall evaluation of the project as it is presented in the required application elements as well as an assessment of the applicant's ability to successfully administer the programmatic and financial aspects of the project. Applications are reviewed by appropriate GMD staff and may also be assessed by an independent review from subject matter experts. All reviews are conducted using set review criteria, which are specific to the program (see table below).

Following the initial review of the application, GMD may request additional information or explanation from the applicant in order to complete the review of the application. Previously unfunded applicants may be asked to supply additional supporting documentation such as, evidence of not-for-profit status, 990 form, etc. Notification may be in the form of a system-generated message, written letter, email, or telephone call. Failure to respond during the specified time frame may result in the application not being further considered for funding during that application period. Responses to requests for additional follow-up will be considered during the funding decision and assignment process.

Award recommendations are made by GMD to the Secretary of the Kentucky Justice and Public Safety Cabinet. Final approval of all grant applications rests with the Secretary and/or the Governor of the Commonwealth. Award notifications will be made upon completion of that process.

REQUIRED APPLICATION ELEMENTS

As reviewers take into consideration the basic objectives of the VAWA STOP Formula Grant Program, they apply the following criteria:

- **VAWA-Funded Project Proposal**

Provides a detailed description of the problem to be addressed by the grant-funded project, including supporting local and state data that describes the problem.

- **Goals, Objectives and Performance Measures Goals**

Discusses the significance of the project and describes how it assists victims of crime. Clearly provides description of long-term effect(s) the proposed project should achieve. Where applicable, describes how project design employs evidence based practices or is based upon research knowledge and/or data.

- **Objectives**

- Describe project objectives, which is a measurable step you take to achieve a strategy. It should be 'SMART' – specific, measurable, accurate, realistic, and time-bound.

- **Performance Measures**

- Explain how the program's effectiveness will be demonstrated and discuss the significance of the program's impact in assisting victims of crime. For each performance measure selected, describe: 1) what data will be collected; 2) how it will be collected; 3) how it will be assessed/analyzed; and 4) the process for reporting the findings and outcomes which will measure the impact of the proposed efforts. Includes innovative approaches which will be used to maximize the programs' impact and cost-effectiveness and how this will help sustain the program when grant funding ends.

- **Project and Agency Details**

Project activities contain a concise summary of the proposed project, including a description of major tasks necessary to fully implement. Provides the who, what, where, when and how of the proposed project. Includes a data collection procedures, continuing or new activities, responsibilities of grant staff personnel; a comprehensive performance timetable identifying milestones to be achieved in this project. Ties activities to goals, objectives, and the performance measures applicable to the proposed project.

- **Coordination Narrative**

Provides a description of how working with community or agency partners will enhance project success. How does this agency's coordination efforts make a substantial impact within communities, sectors, or organizations to support victim service delivery?

- **Budget Narrative and Budget**

Provides a comprehensive budget and budget narrative that are complete, allowable, justified, and clearly related to project goals, objectives and operations. Applicants are strongly encouraged to avoid unsubstantiated equipment purchases.

REVIEW CRITERIA

- 1) Are the expenses as presented reasonable, allowable, and necessary? If appropriate, have they been allocated across applicant funding sources?
- 2) How will the funding enhance the ability of the applicant to respond to the Federal and State VAWA STOP Program Priorities?
- 3) Has the applicant adequately justified the need for the funding? Please also consider:
 - a. Are there any other sources of funds that could be a better fit for this project?
 - b. Has the applicant certified and adequately ensured that these funds will not supplant available local or state dollars?
 - c. Does the project, as presented in the application, reflect an effective use of resources?
- 4) Has the applicant adequately displayed their capacity/competency to manage and execute the project?

AWARD NOTIFICATION AND ACCEPTANCE

Notification: Award announcements cannot be made without approval from the Justice and Public Safety Cabinet Secretary and the Office of the Governor. Recipients of awards will be notified by e-mail and will receive further instructions on award acceptance from Grants Management Division staff via e-mail, telephone, or other means. Those instructions may include the need to make modifications to the original submitted budget, based upon the amount of the actual award.

Conditions of Awards: Once budget modifications have been completed and the subaward assigned to a federal award, an Award Binder will be generated in *IGX*. All subgrant awards include general and special conditions the subrecipient must meet if the subgrant award is accepted. Subrecipients are encouraged to carefully read and understand the conditions as presented in the Award Binder prior to accepting the award. Questions may be directed to GMD staff.

Waste, Fraud or Abuse: If awarded VAWA funds, the subrecipient agrees to refer promptly to an appropriate inspector general any credible evidence that a principal, employee, agent, contractor, subcontractor, or other person has permitted a false claim under the False Claims Act or has committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving grant funds. Such reports may be forwarded to:

Office of the Inspector General
U.S. Department of Justice
Investigations Division
950 Pennsylvania Avenue, NW
Room 4706
Washington, DC 25030

Award Acceptance: When the subrecipient is notified the Award Binder is available in *IGX*, the subrecipient has 15 business days to accept the award by either electronically signing the Award Binder page in *IGX*, or obtaining the appropriate signature on a printed version of same and submitting the entire award document to their VAWA Program Manager via email.

If the acceptance process is not completed within the allotted time period, GMD reserves the right to withdraw the award. The award document must be signed by the Agency Authorized Official (AO). The applicant agrees to commence project activities within sixty days of the approved project start date. Non-commencement of project activities may lead to cancellation of the grant award. Evidence of project commencement shall be included in the first quarter Progress Report.

Reporting Requirements:

The subrecipient agrees to submit financial and program reports at least quarterly, as required. The subrecipient must collect and maintain data that measures the performance and effectiveness of work under this award. The data must be provided to GMD in the manner (including timeframes) specified IN the program solicitation or other applicable written guidance. Data collection supports compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act of 2010, and other applicable laws. The schedule for filing reports is as follows:

- Quarter 1 runs from January 1st – March 31st with reporting due April 15th;
- Quarter 2 runs from April 1st – June 30th with reporting due July 15th;
- Quarter 3 runs from July 1st – September 30th with reporting due October 15th;
- Quarter 4 runs from October 1st – December 31st with reporting due January 15th.

The Financial Officer assigned to the grant award, or a designee *not assigned in another capacity* on the award, should be the only person to submit financial reports. Failure to submit financial reports according to the time set forth may result in delays or withholding of funds. Financial reports can be submitted on a monthly or quarterly basis as determined by the subrecipient with approval by GMD; however, once a method is selected, it cannot be changed during the grant period.

Subrecipients shall submit GMD financial reports which include itemized expenses requested for reimbursement. Invoices and other documentation of award and any required match expenditures shall be submitted with each quarterly or monthly financial report, as required, and documentation, such as time and attendance records, should be submitted within ten days of execution. For information on contract assistance, including type of contract needed and verbiage may be found at http://www.ojp.gov/funding/pdfs/procurement_procedures.pdf.

Subrecipients are required to submit performance reports to GMD, through the *IGX* system, within the identified timeframe above.

Evaluation and Monitoring

Each program funded by the Justice & Public Safety Cabinet under the VAWA STOP Program shall contain an evaluation component. Project Reports will be analyzed for evaluation purposes. However, some projects may receive intensive evaluations.

Grants Management Division monitoring includes desk audits, a review of financial and program reports submitted by the subrecipient on a quarterly basis and periodic on-site monitoring to review grant compliance, assess management controls, evaluate the applicable activities and provide technical

assistance. In addition, the subrecipient agrees to maintain and provide any data or information requested for the purposes of monitoring and program evaluation. For additional information, see GMD Management Policies and Procedures Manual, <https://justice.ky.gov/Departments-Agencies/GMD/Documents/GMD%20POLICY%20and%20PROCEDURE%20MANUAL%204-21-21.pdf> .

Grant Adjustments

Changes in the overall scope of the project are unallowable without express written prior approval from GMD. However, minor changes to the project and budget adjustments may be requested using the GAN process. Approval of a GAN must be obtained prior to any obligation of grant funds not approved in the most current version of the application. GANs for VAWA awards must be submitted by October 30th of the grant year unless otherwise discussed with GMD staff, and revisions will not be retroactive.

GMD will be notified in writing of all employee changes pertaining to this grant within thirty (30) days of occurrence or prior. A GAN is required for changes in the Agency Executive Director, Financial Officer, or Project Director. Subrecipients should note that an agency's Financial Officer cannot be the same person that functions as the Agency Executive Director or Project Director.

The GAN process goes as follows:

- GMD program staff are notified in writing of any staff changes or changes to the budget and/or project of the award
- Once program staff have notified subrecipient that the request has been reviewed, subrecipient will submit to GMD financial staff a detailed spreadsheet of all changes that are requested in the GAN
- Once financial staff have notified subrecipient that requested changes are tentatively approved, subrecipient will submit a GAN request in *IGX*.
- GMD staff will approve or deny the submitted GAN Request, allowing subrecipient to submit necessary changes as discussed with financial staff prior
- GMD financial staff will approve or deny GAN once the final review has been conducted.

BUDGET CHECKLIST

This checklist is for your convenience in preparing your application budget, along with a budget narrative, as part of the VAWA grant application. It is for your use only and should not be submitted with the application.

SECTION I. PERSONNEL

Salaries

- Is the basis for determining each employee's compensation described?
- Is each position identified by title?
- Will vacant positions be filled by new hires or transfers from within? If transfers, will replacements be hired?
- Are time commitments stated?
- Is the amount of each employee's annual compensation stated?
- Are salary increases anticipated during the grant period? If so, are the increases justified in the narrative?
- Are any personnel costs dual compensation?

Fringe Benefits

- Is each type of benefit indicated separately?
- Has the appropriate percentage and calculation been provided?
- Is the authority for the percentage provided?
- Are the listed benefits provided for all employees of the agency?
- Are fringe benefit increases anticipated during the grant period? If so, are the increases justified in the narrative?

SECTION II. CONTRACTUAL SERVICES

- Is the type of each service to be rendered described?

For individuals:

- Is an hourly or daily rate given? Are base rates justified and reasonable?

- Is the total amount for any contract in excess of \$10,000? If so, has the applicant indicated that services have been or will be obtained by acceptable procurement procedures?
- Is "sole source" an issue? If so, is justification included?

SECTION III. TRAVEL

- Is a basis for computation provided?
- Is the purpose of requested travel directly related to the proposed project?
- Are per diem, lodging and transportation costs listed separately?
- Have the most economical costs been provided?
- Have the appropriate project personnel been identified for the travel?

SECTION IV. OPERATING EXPENSES

- Are operating expenses listed by major types (e.g., Supplies, Rent, Postage, etc.)?
- Are unit costs or monthly estimates provided?
- Will appropriate procurement procedures be followed?

SECTION V. EQUIPMENT (cost greater than \$5,000)

- Are equipment items specified by units and cost?
- Is the requested equipment project-related?
- Will the purchased equipment be used 100% in the project? If not, has the cost been prorated and computation provided?
- Is no other equipment owned by the agency suitable for the project?
- Will appropriate procurement procedures be followed? Is "sole source" an issue? If so, is justification included?

SECTION VI. SOURCE OF MATCH

- Is the source of match identified?
- Is the minimum cash or in-kind match requirement met?