



KENTUCKY JUSTICE &  
PUBLIC SAFETY CABINET



# VAWA 2022

## APPLICATION GUIDELINES AND INSTRUCTIONS

**Violence Against Women Act  
Formula Grant Program**

Catalog of Federal Domestic Assistance  
(CFDA) Number: 16.588

## TABLE OF CONTENTS

<b>STATE ADMINISTERING AGENCY</b> .....	2
<b>INTRODUCTION</b> .....	3
<b>AWARD PERIOD</b> .....	3
<b>APPLICATION OPEN PERIOD DATES</b> .....	3
<b>SUBAWARD INFORMATION</b> .....	3
<b>FEDERAL AWARDS ANTICIPATED FOR USE</b> .....	3
<b>ELECTRONIC GRANTS MANAGEMENT SYSTEM</b> .....	4
<b>GRANT PROPOSAL</b> .....	4
<b>SYSTEM FOR AWARD MANAGEMENT UNIQUE ENTITY IDENTIFIER</b> .....	5
<b>REQUIREMENT TO DISCLOSE POTENTIAL CONFLICTS OF INTEREST</b> .....	5
<b>LOBBYING DISCLOSURE REQUIREMENT</b> .....	5
<b>LETTERS OF SUPPORT</b> .....	5
<b>ALLOCATION OF SUBAWARDS</b> .....	5
<b>ELIGIBILITY AND REQUIREMENTS</b> .....	6
Statutory Program Purpose Areas.....	6
Federal VAWA STOP Program Priorities.....	8
Kentucky VAWA STOP Program Priorities.....	9
Program Requirements.....	9
Additional Considerations.....	12
<b>ALLOWABLE COSTS</b> .....	12
Indirect Costs and De Minimis.....	13
<b>UNALLOWABLE COSTS AND ACTIVITIES</b> .....	13
<b>GENERAL FINANCIAL REQUIREMENTS AND INSTRUCTIONS</b> .....	14
Sound Financial Management.....	14
Accounting System.....	14
No Charge to Victims for VAWA-Funded Services.....	15
Proration of Costs.....	16
Cost Allocation.....	16

VAWA 2022 Application Guidelines and Instructions (Revised July 1, 2022)

Supplanting.....	16
Match Requirements .....	16
Supporting Documentation .....	17
Requirement to Follow the Most Restrictive Financial Policy .....	17
Applicant Information .....	17
Application .....	18
<b>BUDGET</b> .....	20
Personnel .....	20
Contractual Services.....	22
Travel and Training.....	23
Operating Expenses .....	24
Equipment.....	25
Budget Narrative .....	26
Budget Summary.....	26
<b>AWARD RECOMMENDATION PROCESS</b> .....	27
Award Notification and Acceptance.....	27
Award Acceptance. ....	28
Reporting Requirements.....	28
Performance Reporting.....	29
Financial Reporting.....	29
Hiring Requirements.....	29
Grant Award Modifications .....	30
Training .....	31
Budget Checklist.....	32

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## INTRODUCTION

The primary objective of the Services \* Training \* Officers \* Prosecutors (STOP) Violence Against Women Act (VAWA) Formula Grant Program is to support communities in their efforts to develop and strengthen effective responses to domestic violence, dating violence, sexual assault, and stalking including law enforcement and prosecution strategies to combat these crimes and victim services in cases involving these crimes.

This solicitation establishes program and financial policy as well as provides administrative guidance to effectively manage the STOP Violence Against Women Act Formula Grants. There are additional instructions for the VAWA application, grant management processes and procedures, and post-award requirements.

Application Guidelines and Instructions are consistent with U.S. Department of Justice (USDOJ), Office on Violence Against Women (OVW), and the Violence Against Women Act of 1994 (reauthorized in 2000, 2005, 2013, and 2019). Funds are awarded, through a competitive process, by the Justice and Public Safety Cabinet (JPSC) to state agencies, units of local government, and private nonprofit organizations. Successful applications must comply with priorities established by USDOJ, OVW, and JPSC.

The standard award period is one calendar year (12) months from January 1 through December 31. For applications in 2022, the award period will be January 1, 2023, through December 31, 2023.

## AWARD PERIOD

The standard award period is one calendar year (12) months. For 2022, the award period will be January 1, 2023, through December 31, 2023.

## APPLICATION OPEN PERIOD DATES

The VAWA 2022 subgrant application opportunity will open on Monday, August 1, 2022, and close on Thursday, September 15, 2022, at 6:00 p.m. ET.

The 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	~\$2.0 million
Amount awarded under previous solicitation	~\$2.2 million
Period of Performance Start/End Date	1/1/2023 – 12/31/2023
Period of Performance Duration	12 months

## FEDERAL AWARDS ANTICIPATED FOR USE

2020-WF-AX-0006; 15-JOVW-21-GG; 00523-STOP; 2022 (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.*

## ELECTRONIC GRANTS MANAGEMENT SYSTEM

All grant activities are managed through the Kentucky Justice and Public Safety Cabinet’s (JPSC) electronic grants management system also known as *Intelligrants 10.0 (IGX)*. Applications should be submitted via *IGX* by the submission deadline referenced in this document. New applicants must establish a user account at <http://kyjusticeigx.intelligrants.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.

Each user account will be registered as either an Authorized Official (AO) or Grant Administrator (GA). It is important to understand which user role should be assigned to members within your organization depending on the permissions, or functions, available to each user role. More than one individual in an organization may be assigned to the AO role, but applicants are encouraged not to assign all individuals as AOs. Applicants should follow the principle of least privilege when assigning user roles to maintain separation of duties to the greatest extent possible.

IGX User Role	Allowable Actions
Authorized Official (AO)	<ul style="list-style-type: none"> <li>• Initiate and populate grant application</li> <li>• Submit grant application</li> <li>• Add or remove users from your agency account</li> <li>• Sign the award binder</li> <li>• Create and submit a Grant Award Modification (GAM) request</li> <li>• Create and submit progress reports</li> <li>• Create and submit financial reports</li> </ul>
Grant Administrator (GA)	<ul style="list-style-type: none"> <li>• Initiate and populate grant application</li> <li>• <b>Note: This role cannot submit application</b></li> <li>• Create and submit a Grant Award Modification (GAM) request</li> <li>• Modify contact information, general information, and budget pages during “GAM Modification in Process” status</li> <li>• Create and submit progress reports</li> <li>• Create and submit financial reports</li> </ul>

The Authorized Official (AO), designated in *IGX* by the applicant, will receive a conformation email upon successful submission of an application. This should be retained for the applicant’s records. Applicants can view the status of their applications at any time prior to award notification using the Details section of the application landing page. 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 [JUSIGX@ky.gov](mailto:JUSIGX@ky.gov).

## 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.** Most *IGX* text-box application pages will track character limits (number of letters utilized) and

display the maximum number of characters allowed per textbox. 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.

### **SYSTEM FOR AWARD MANAGEMENT UNIQUE ENTITY IDENTIFIER**

All applicants for federal funds must include a Unique Entity Identifier (UEI) from the federal System for Award Management (SAM) in their application for a new award or a supplement to an existing award. A SAM UEI is a unique 12-character alpha-numeric value assigned to all entities (public and private companies, individuals, institutions, or organizations) who register to do business with the federal government in SAM. Vendors are required to complete a one-time process to provide basic information relevant to their organizations. The identifier is used for tracking purposes and to validate address and point of contact information for federal assistance applicants, recipients, and subrecipients. If your agency is already registered in SAM, then your agency was automatically assigned a UEI. First-time SAM registrants can request UEIs by visiting <https://sam.gov/content/duns-uei> and then clicking the green Get Started button. Have your agency’s legal business name and address ready. **All agencies must elect to be viewable in SAM Public Search to allow GMD to verify their eligibility to receive federal funds.**

### **REQUIREMENT TO DISCLOSE POTENTIAL CONFLICTS OF INTEREST**

Decisions related to the use of these funds must be free of undisclosed personal or organizational conflicts of interest. Applicants are required to disclose in writing any potential conflict of interest, either in fact or appearance, as defined by [Section 3.20 of the DOJ Grants Financial Guide](#). Potential conflicts of interest must be disclosed on agency letterhead and uploaded to the Attachments Page of this application. Disclosures of potential conflicts of interest are required for each grant period regardless of existence or prior disclosure in a previously funded grant year.

### **LOBBYING DISCLOSURE REQUIREMENT**

As a matter of federal law ([18 U.S.C. 1913](#)), federal funds may not be used by any subrecipient (“subgrantee”) at any tier, either directly or indirectly, to support or oppose the enactment, repeal, modification, or adoption of any law, regulation, or policy, at any level of government. All applicants must disclose the existence or nonexistence of lobbying activities by completing and attaching Form SF-LLL to the Attachments page. The *Disclosure of Lobbying Activities* form can be downloaded from: <https://ojp.gov/funding/Apply/Resources/Disclosure.pdf>.

### **LETTERS OF SUPPORT**

All submissions must include three (3) original letters of support from other agencies within your community that provide services to or operate on behalf of victims of crime. Letters of support should include a meaningful description of collaboration for proposed project success (i.e., what each party plans to contribute to the collaborative relationship) and must include names of agencies and signatures of authorized officials. Upload the scanned, dated, and signed letters to the “Attachments” page.

### **ALLOCATION OF SUBAWARDS**

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.

Discretionary funds, which constitute 15% of the total award, will be used for multidisciplinary projects that do not fit into another category. These funds will also be used for other categories in situations where allocated funds are not sufficient to both ensure continuity of services and to ensure an increasingly equitable distribution of funds throughout the Commonwealth.

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## **ELIGIBILITY AND REQUIREMENTS**

### **Statutory Program Purpose Areas**

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:
  13. 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;
  14. Notifying persons seeking enforcement of protection orders as to what responses will be provided by the relevant law enforcement agency;
  15. Referring persons seeking enforcement of protection orders to supplementary services (such as emergency shelter programs, hotlines, or legal assistance services); and;
  16. Taking other appropriate action to assist or secure the safety of the person seeking enforcement of a protection order.
  17. 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—
  18. 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;
  19. 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

20. The development of such protocols in collaboration with State, Tribal, Territorial and local victim services providers and domestic violence coalitions.
21. 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.
22. 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;
23. Developing, implementing, or enhancing Sexual Assault Response Teams (SARTs), or other similar coordinated community responses to sexual assault.
24. 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;
25. Developing, enlarging, or strengthening programs addressing sexual assault against men, women, and youth in correctional and detention settings;
26. 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;
27. 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
28. 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.

### **Federal VAWA STOP Program Priorities**

In FY 2022, The Office on Violence Against Women (OVW) is interested in supporting the following priority areas identified below. In shaping their strategies for FY 2022, OVW encourages states and territories to develop and support projects that:

- Advance racial equity as an essential component of ending sexual assault, domestic violence, dating violence, and stalking.
- Increase access to justice for all survivors of sexual assault, domestic violence, dating violence, and stalking, including through exploration of survivor-centered criminal justice system reform.
- Strengthen efforts to prevent and end sexual assault, including victim services and civil and criminal justice responses.
- Expand economic justice and financial advocacy for survivors of sexual assault, domestic violence, dating violence, and stalking, including as a tool for violence prevention.
- Improve outreach, services, civil and criminal justice responses, prevention, and support for survivors of sexual assault, domestic violence, dating violence, and stalking from underserved communities, particularly LGBTQ and immigrant communities.

### Kentucky VAWA STOP Program Priorities

For Federal Fiscal Year (FFY) 2022 through FFY 2026 Kentucky has adopted the following goals and program priorities:

- Provide non-discriminatory, accessible, culturally appropriate services through meaningful access to all victims of sexual assault, dating/domestic violence and stalking including those from historically marginalized, unserved, and underserved, and inadequately served populations and culturally specific communities.
- Increase access to quality, affordable, and culturally competent, legal services for victims of sexual assault, dating/domestic violence, and stalking who cannot afford to access these services through private counsel.
- Increase the use of community coordinated, multidisciplinary responses to dating/domestic violence, sexual assault and stalking which focus on including and improving the medical component of the response.
- Improve and expand stalking specific services and resources.
- Reduce the number of domestic violence-related homicides in Kentucky.

To view the current Kentucky STOP Implementation Plan, please select this link <https://justice.ky.gov/Departments-Agencies/GMD/Pages/vawa.aspx>.

### Program Requirements

Federal Guidelines and the Kentucky Justice and Public Safety Cabinet, Grants Management Division, establish eligibility criteria that must be met by all organizations that receive VAWA funds. 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 the criminal justice response to these crimes. Proof of non-profit or public organization status of applicant organizations must be attached to the application where designated.
2. **Record of Effective Services.** Eligible organizations must also demonstrate a record of providing effective services and organization capacity to administer the project. Applicants should show support and approval of their services by the community, a history of providing services in a cost-effective manner, and financial support from other sources.
3. **Promote Community Efforts to Aid Victims of Violence Against Women.** Subrecipients will commit to promotion of coordinated public and private efforts to aid victims within the communities served. 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).
4. **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.

5. **Non-Discrimination.** Entities receiving financial assistance from the federal government must comply with the federal statutes and regulations that prohibit discrimination in federally assisted programs or activities. Subrecipients receiving DOJ funds, are required to obtain Federal Civil Rights Non-Discrimination training. The Office for Civil Rights (OCR) ensures that recipients of financial assistance from Office of Justice Programs (OJP) and its components are not engaged in prohibited discrimination.
6. **Non-disclosure of confidential or private information.** SAAs and subrecipients of VAWA funds shall, to the extent permitted by law, reasonably protect the confidentiality and privacy of persons receiving services under this program and shall not disclose, reveal or release any personally identifying information or individual information collected in connection with funded services requested, utilized, or denied, and any individual client information without the informed, written, reasonably time-limited consent of the person about whom information is sought, except that consent for release may not be given by the abuser of a minor, incapacitated person, or abuser of the other parent of the minor. If release of information is compelled by statutory or court mandate, SAAs or subrecipients of VAWA funds shall make reasonable attempts to provide notice to victims affected by the disclosure of the information and take reasonable steps necessary to protect the privacy and safety of the persons affected by the release of the information.

SAAs and subrecipients may share: non-personally identifying data in the aggregate regarding services to their clients and non-personally identifying demographic information in order to comply with reporting, evaluation, or data collection requirements; court-generated information and law enforcement-generated information contained in secure governmental registries for protection order enforcement purposes; and law enforcement and prosecution-generated information necessary for law enforcement and prosecution purposes.

In no circumstances may a crime victim be required to provide a consent to release personally identifying information as a condition of eligibility for funded services nor any personally identifying information be shared to comply with reporting, evaluation, or data-collection requirements of any program. Nothing in this section prohibits compliance with legally mandated reporting of abuse or neglect.

7. **Federal Civil Rights Training.** Subrecipients must view the OJP Civil Rights Non-Discrimination Training, accessible online at <https://www.ojp.gov/program/civil-rights/online-training>. Subrecipients acknowledge viewing the OJP Civil Rights Non-Discrimination training with submission of signed VOCA Award Documents. OJP Civil Rights Non-Discrimination Training (six training videos) can be viewed on the OJP website at <https://www.ojp.gov/program/civil-rights/online-training>. Subrecipients must also maintain statutorily required demographic data on victims served, including – by race/ethnicity, gender, age, and disability by project period – and permit reasonable access to its books, documents, papers, and records to determine whether the subrecipient is complying with applicable civil rights laws. Demographic data is reported annually through the U.S. Department of Justice, Office on Violence Against Women Annual Progress Report, also known as the “Muskie” report.

8. **Determination of Suitability for Interacting with Participating Minors.** 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. Documentation of such written determinations shall be maintained at the program site and shall be reviewed by GMD or their authorized representative as part of compliance monitoring. See <https://www.ojp.gov/funding/explore/interact-minors> for details of this requirement.
9. **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](#).
10. **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 maybe outlined in Grants Management Division Policies and Procedures, Grant Guidelines, and Special Conditions of the Application or Award.
11. **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.
12. **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.

13. **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.

14. **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.

15. **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 and upload it to the application. The form can be accessed at the following link: <https://justice.ky.gov/Departments-Agencies/GMD/Documents/Old%20Site/FBO%20Hiring%20Exemption%20Certificate.pdf>.

16. **Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence.** Applicants applying for continuation funding must upload a policy at the specified location in the application. Any new recipient, and any new 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.

#### **ALLOWABLE COSTS**

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.

### **Indirect Costs and De Minimis**

Agencies may charge an approved Federally negotiated indirect cost rate or the de minimis rate to VAWA subawards.

**Indirect Costs.** Indirect costs are those costs incurred by the subrecipient in support of general business operations, but which are not attributable to a specific funded project. Typical 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.

Organizations that currently have a current negotiated rate with a federal agency may request its use. A copy of the approved negotiated rate letter must be uploaded with the application.

**De Minimis.** Subrecipients are permitted to charge 10% of the rate of the organizations 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, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs. See 2 C.F.R. 200.1. The 10% rate is also known as a “de minimis” indirect cost rate. See 2 C.F.R. § 200.414 more information on Indirect Costs.

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.

Note: Subrecipients are not permitted to claim indirect costs for expenses that are also being apportioned as direct costs to the subaward. See 2 C.F.R. Section 200.403(d).

### **UNALLOWABLE COSTS AND 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.

## **GENERAL FINANCIAL REQUIREMENTS AND INSTRUCTIONS**

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

- 2 C.F.R. § 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards  
<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>
- *DOJ Grants Financial Guide* (Updated March 2022)  
<https://www.ojp.gov/doj-financial-guide-2022>
- Kentucky Justice & Public Safety Cabinet – Grants Management Division: Management Policies and Procedures (Updated April 2021)  
<https://justice.ky.gov/departments-agencies/gmd/pages/default.aspx>
- Kentucky Finance and Administration Cabinet, Manual of Policies and Procedures  
<https://finance.ky.gov/office-of-the-secretary/office-of-policy-and-audit/Documents/FINAL%202015%20FAP%20Manual%20corrections%20%28Pg%2080%20revision%20+%20111-43-00%29%20071516.pdf>

All VAWA STOP awards funded through the Grants Management Division will be made on a reimbursable basis. Requests for reimbursement may be submitted monthly or quarterly, and once specified, this interval shall remain consistent over the project's period of performance. 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. New applicants must upload a Financial Capability Form to the Attachments page of their applications. This form can be downloaded at the following link:

<https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/FinancialCapability.pdf>.

### **Accounting System**

Subrecipients must maintain an adequate accounting system as defined in the *DOJ Grants Financial Guide*, II. Preaward requirements, 2.3 Standards for Financial Management Systems, Accounting System. This section is accessible online at <https://www.ojp.gov/funding/financialguidedoj/ii-preaward-requirements#6d1xls>.

Subrecipients must have a financial management system in place to accurately record and report on the receipt, obligation, and expenditure of grant funds. The accounting system should be detailed enough to track the following information:



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

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

- Financial reporting that is accurate, current, complete, and compliant with all financial reporting requirements of an award.
- Accounting systems must be able to account for award funds separately. Commingling of funds is prohibited.
- Maintenance of documentation to support all receipts and expenditures and obligations of Federal funds.
- Collection and reporting of financial data for planning, controlling, measuring, and evaluating direct and indirect costs.

Subrecipient accounting systems should have the following capabilities:

**Internal control.** The system should allow for effective control and accountability for all grant and subgrant cash, real and personal property, and other assets. Subrecipients must adequately safeguard all such property and assure that it is used solely for authorized purposes. Adequate internal control also includes segregation of duties, or a control that prevents the same person from executing the multiple steps in a business transaction. For example, the person signing staff timesheets should not be the same person who submits the financial report requesting reimbursement of that personnel expense. Segregation of duties allows for a system of checks and balances that prevents an individual from having sole oversight of the expenditures and revenues of an entity. Please consult 2 C.F.R. § 200.303 for additional information.

**Budget control.** The system should compare actual expenditures or outlays with budgeted amounts for each subaward. 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 or subaward agreement.

**Allowable cost.** The system should support making sure that Federal cost principles, agency program regulations, and the terms of subgrant agreements are followed in determining the reasonableness, allowability, and allocability of costs.

**Source documentation.** The system should require support for accounting records with source documentation (e.g., cancelled checks, paid bills, payrolls, time and attendance records, and contract and award documents).

### **No Charge to Victims for VAWA-Funded Services**

Funded direct services must be provided at no charge, unless the Justice and Public Safety Cabinet grants a waiver allowing the subrecipient to generate program income by charging for services. Program

income, where allowed, shall be subject to federal grant rules and the requirements of the *DOJ Grants Financial Guide*, which, as of March 2022, require in most cases that any program income be restricted to the same uses as the subaward funds and expended during the period of performance in which it is generated. Additional information about program income requirements is accessible online at:

<https://www.ojp.gov/funding/financialguidedoj/iii-postaward-requirements#2kqnom>.

### **Proration of Costs**

Applicants that conduct both allowable and unallowable activities must reasonably prorate their costs to ensure that VOCA funds and match (both cash and in-kind) are used only for allowable direct services to victims. The proration method and rationale must be explained within the budget narrative.

### **Cost Allocation**

If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis, with certain exceptions. See 2 C.F.R. § 200.405 for additional information.

### **Supplanting**

The USDOJ defines supplanting as the reduction of funds from non-federal sources because of the receipt or expected receipt of federal funds budgeted for the same purpose.

Federal funds must be used to supplement existing State and local funds for program activities and must not replace those funds that have been appropriated or allocated for the same purpose. Additionally, Federal funding may not replace state or local funding that is required by law.

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.

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. Additional guidance for subrecipients on the maintenance of documentation to sufficiently demonstrate non-supplanting is explained in Section 2.3 of the *DOJ Grants Financial Guide*, available at <https://www.ojp.gov/funding/financialguidedoj/ii-preaward-requirements#z0opk7>.

### **Match Requirements**

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.

**Exceptions to the 25% Match.** Consistent with OVW guidelines and requirements, matching funds may be waived for certain programs which provide direct victim services regardless of the funding category assigned. Grants Management Division 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.

### **Supporting Documentation**

Subrecipients must maintain appropriate financial records that fully disclose and document the amount and disposition of grant funds received. Specific examples of supporting documentation to substantiate grant disbursements and subrecipient compliance with the laws, regulations, conditions, and policies governing VOCA awards are identified for each budget category in the Budget section of this document.

### **Requirement to Follow the Most Restrictive Financial Policy**

When there is a lack of congruity between an applicant or subrecipient financial policy and those of the Commonwealth, the MOST RESTRICTIVE policy must be followed.

### **Applicant Information**

**Contact Information.** The following persons 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 for the applicant organization (e.g., state agency head, county judge executive, city mayor, county attorney, executive director, etc.). This person may designate another agency official with authority to sign award documents and other grant documentation on their behalf, by submitting a signed letter on agency letterhead documenting such designation.
- **Project Director/Agency Administrator.** The employee of the applicant organization who will be responsible for the operation of the project and for submitting program reports.
- **Financial Officer.** The chief financial officer of the applicant organization (e.g., county auditor, city treasurer, comptroller, etc.) who will be responsible for all financial aspects of the grant's management, including submitting financial reports. Please note the Financial Officer assigned to the award should not be assigned multiple roles. This ensures segregation of duties. The Financial Officer assigned to the grant award, or a designee not assigned in any other capacity on the award, shall be the only person to submit financial reports.

**General Information.** Includes Project Title, Past Funding, Employer Identification Number (EIN), SAM Unique Entity Identifier (UEI), Grant Period, Agency Type and Description, and Agency Introduction. For assistance obtaining a UEI, please visit <https://sam.gov/content/duns-uei>.

**Area Served.** Indicate Area Development District(s), County(ies), and Congressional Districts served by applicant organization.

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

**Determination of Suitability to Interact with Participating Minors.** Determination of suitability is

required, in advance, for certain individuals who may interact with participation minors. Upload completed Determination of Suitability for Interaction with Minors Form, available for download on the application page, to demonstrate compliance with this federal award condition. (See page 10 at No. 8 for more information).

**Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence.** Upload the policy on the application page, to demonstrate compliance with this federal condition. New applicants who receive funding but who do not currently have a qualifying policy must issue a policy within 270 days of the award date. (See page 12 at No. 16 for additional information).

**Equal Employment Opportunity.** Applicants are advised 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 subawards) 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 a 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, JPSC GMD 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.

**Limited English Proficiency.** *Title VI of the Civil Rights Act of 1964* requires that the federal government and those receiving assistance from the federal government must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to the programs, services, and information those entities provide. Agencies must establish and implement policies and procedures for language assistance services that provide LEP persons with meaningful access, without additional charge.

## Application

**Terms & Conditions.** Applicants are advised to read application Terms and Conditions carefully every year before certifying, as terms and conditions are subject to change annually.

**Guidelines & Instructions.** Applicants are advised to read and understand the application Guidelines and Instructions prior to preparing an application. Applicants may contact GMD staff with questions or if clarification is needed.

**STOP Purpose Areas.** VAWA funds may only be used to support proposed projects that support one or more of the listed STOP purpose areas. For more information see page 6 above.

**Kentucky Program Priority Areas.** Kentucky has identified five (5) goals or priority areas for use of its

VAWA funds. Kentucky’s 2022 – 2026 Implementation Plan, including funding priorities and goals is available at <https://justice.ky.gov/Departments-Agencies/GMD/Pages/vawa.aspx>. For more information see page 8 above.

**Project Proposal.** The description of the project the applicant proposes to fund with a VAWA award should include the following:

- An introduction to the project.
- Essential components of project implementation.
- An explanation of the need for each component of the proposed project, including how currently available services are inadequate to meet the needs of victims, supported by local, regional, or state data and evidence-based research including expert views and trends.
- Citations should be specific, relevant to Kentucky, and current. Applicants are required to upload a citation list to the Project Proposal page of the application.

**Goals and Objectives.** Briefly state one of the long-term effects the project should achieve and at least one objective for each goal that will identify measurable results that the proposed project will attempt to achieve

**Project Details.** This section should clarify information regarding the proposed VAWA-funded activity including how the proposed project complements the mission of the applicant agency and supports one or more Kentucky priority purpose areas.

**Project Coordination Narrative.** Describe how working with community partners will enhance the success of the project.

**Agency Performance.** Applicants proposing continuation funding will provide a description of funded services provided in the last year. Description must include number of clients served, services provided, and counties served. New applicants must provide an overview of services provided in the last year. Additionally, all applicants will describe agency outreach and services to unserved and/or underserved populations in the past year and are encouraged to explain how the proposed project will enhance agency performance.

**Attachments.** The following upload fields are available on the Attachments page. For more information on the specific attachments see pages 5 and 15 above.

Three (3) Letters of Support	Required
KCADV/KASAP Certification	If Applicable
Board Member Representation	If Applicable
Financial Capability Statement	New Applicants
Conflict of Interest Disclosure	If Applicable
Lobbying Disclosure Form SF-LLL	Required

Subrecipients must disclose any personal or organizational conflicts of interest, in fact or appearance, as defined within the *DOJ Grants Financial Guide*, III. Postaward Requirements, 3.20 Grant Fraud, Waste, and Abuse, Conflicts of Interest. Disclosures should be prepared on letterhead, addressed to GMD, and uploaded in the designated upload field on the Attachments page. Subrecipients are required to disclose conflicts of interest for each grant period regardless of existence or prior disclosure in a previously funded

grant year. For more information see page 5 above.

## BUDGET

There are five (5) budget categories: Personnel, Contractual Services, Travel/Training, Operating Expenses, and Equipment.

- Budget forms must be completed in detail, with amounts rounded to the nearest whole dollar.
- Program goals and objectives should be considered when generating the budget so that budget requests promote the overall effectiveness of the project.
- When preparing your budget, please consider the following questions for each requested expenditure: Is it **allowable**? Is it **reasonable**? Is it **necessary**? Is the cost **properly allocated**?
- 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.
- A budget checklist is provided at the end of this section to assist in completing the VAWA application.

An overview is provided of each budget category. Allowable costs, compliance considerations, and supporting documentation requirements are included.

## Personnel

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

Each position must be listed by title (and either the name of the employee or reflected as "to be hired" or "TBH"), total gross salary rate for the employee, percentage of the employee's time devoted to project activities, and total employee cost for the project. Please include the abbreviation to denote full-time (FT) or part-time (PT) status in the position title. Example Position Title: FT Victim Advocate (TBH).

- Where salaries apply to both project and non-project activity or apply to two or more separate projects or funding sources, proration of costs to each activity must be made based on actual time and activity on the project.
- 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 activity records.
- 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.
- Dual compensation is not allowed.
- Positions supported by multiple funding sources (allocated at less than 100% to the VAWA project) must include a breakdown of job duties that clearly describes funded duties and non-VAWA duties. The employee's timesheets shall indicate such separation of time worked.
- Payments for fringe benefits are allowable personnel costs but cannot exceed the amount paid by the employer. 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 (up to the cost of a single plan)
  - b. FICA

- c. Retirement
- d. Worker's Compensation
- e. Unemployment Insurance

**Overtime.** Overtime pay can be included for personnel funded by the grant on a full-time basis whose duties are consistent with the funded project. Overtime pay must be approved through the original grant application or through a subsequent Grant Award Modification (GAM). For additional information, visit the U.S. Department of Labor Wage and Hour Division website: <https://www.dol.gov/agencies/whd>.

**Prosecutor Based Advocates.** Pursuant to [KRS 15.760](#) and [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).

**Volunteers.** OVW does not require volunteer usage as a prerequisite for the receipt of VAWA funding. Volunteers may, however, work on the project, if appropriate.

Volunteer hours used for **in-kind match**, must be providing VAWA-allowable services and related to the VAWA project for which the grant was awarded. Volunteers must be at least 18 years of age and perform professional duties related to the grant project. Completion of background checks on potential volunteers is strongly encouraged and required before volunteers interact with participating in project activities. See *Determination of Suitability to Interact with Participating Minors*.

An hourly rate for volunteer activities is determined by the salary plus any applicable fringe benefits that an agency would assign to a paid staff position performing the same duties. Applicants may consider the value of volunteer time for Kentucky (NOT the national average), which is accessible at <https://independentsector.org/value-of-volunteer-time-2021/> but this website should not be the sole or primary basis of such valuation.

**Exclusions – Personnel.** The following **cannot** be supported with VAWA funds 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 and activity logs.
- Time spent operating crisis line that is not supported by a time log that includes 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
- 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 are allowable.

**Supporting Documentation – Personnel Costs.** Subrecipients are required to maintain supporting documentation for all Personnel Expenses. Requirements include, but are not limited to:

- **Time and Activity Reports.** Timesheets for grant-funded staff, included those used as match, must:
  - Reflect an after-the-fact accounting of the total activities 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.
  - Be prepared at least monthly and coincide with one or more pay periods.
  - Include original signatures of the employee and approving supervisory official having firsthand knowledge of the work performed.
- **Volunteers Timesheets.** Volunteer timesheets are required to provide information to document the number of hours and activities performed, and must have the same signature requirements as timesheets for funded personnel. Additionally, volunteer timesheets must demonstrate that only hours spent performing VOCA-allowable activities are being applied as match.
- **GMD Hiring Request Form.** GMD Hiring Request Form with GMD signature conveying approval of the use of grant funds for all grant-funded staff hired during the project period. This form should be uploaded to IGX.
- **Invoices and proof of payment** for fringe benefits reflecting the actual costs paid by the employer.

### **Contractual Services**

Compensation for individual consultant services shall be reasonable and consistent with that paid for similar services in the marketplace. 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:

- 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).
- The contractual agreement is written, formal, proper, and otherwise consistent with the applicant's usual practices.
- Time and/or services for which payment will be made and rates of compensation must be supported by adequate documentation.



- Travel and subsistence costs are incurred at a rate consistent with the most restrictive applicable financial policy.
- Subrecipient must screen all contractors and vendors for suspension or debarment from receiving federal funds. No grant funds may be paid to vendors or contractors who are ineligible to receive them due to suspension or debarment. The screening process should be well documented.

#### Contractual Agreements Required Documentation

- Contracts must be submitted to GMD within 10 days of execution. If a subrecipient has paid a contractor with grant funds without a contract in place, the subrecipient may not be paid or may be required to repay all related contractual expenses for failure to properly support the use of award funds.
- For each contractual line item requested, applicants should upload the following documents as a single PDF packet using the upload boxes available on the Contractual Services budget page.
  - A copy of the proposed contractual agreement, if available. Dates should be specific to the project period. Compensation rate must be specified.
  - Job description for any contractors who regularly function as agency staff members.
  - Resume for any contractors who regularly function as agency staff members.

#### Supporting Documentation – Contractual Services.

Expenses charges to the Contractual Services budget category shall be supported by the following:

- A copy of the fully executed contractual agreement
- Invoices, if applicable
- Receipts for travel and subsistence costs, if applicable
- Procurement audit trail or approved sole source justification request, if applicable
- Documentation demonstrating subrecipient screened for contractor/vendor suspension or debarment prior to remitting grant funds

For information on contract assistance, including contract types and verbiage, see *Guide to Procurement Under DOJ Grants and Cooperative Agreements* at <https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/GuideToProcurementProcedures.pdf>.

#### Travel and Training

Training costs for paid and volunteer staff who are identified as part of the VAWA project are allowable costs. Use of VAWA funds for training is limited to staff development of service providers in individual projects to enhance skills directly related to stated project goals and activities.

**If the travel and reimbursement policies of the applicant or subrecipient are more restrictive than those of the Commonwealth, the MORE RESTRICTIVE rate must be followed.**

**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, or match, must complete 12 hours of related training during the award period.

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

- Training to enhance administrative or management skills
- Training for board members
- Additional expense for first class travel

- Telephone, tips, and laundry charges incurred at a lodging establishment
- “Gas cards” or comparable cards whose usage or expenditures cannot be tracked

**Supporting Documentation – Travel and Training.** Subrecipients are required to maintain supporting documentation for all Travel and Training expenses. Requirements include, but are not limited to:

- Lodging receipts
- Travel log linking reimbursed costs with funded project activities
- Documentation of travel distance (e.g., Kentucky Official Highway Map, MapQuest, Google Maps, or similar mapping service) to support mileage reimbursement requests
- Conference registration receipts, if applicable
- Proof of payment

For additional guidance on travel expense reimbursement, see 200 KAR 2:006 and <https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/GuideToProcurementProcedures.pdf>.

### **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
- Books, training manuals and videos for direct service providers
- Rental of office space or project performance site
- 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.”
- Equipment usage fees supported by usage logs
- Office furniture (example – desk, chair, file cabinet)
- Office supply line items can include consumable items, e.g., postage, paper, pens, notepads, staples, etc.
- Computers, tablets, printers, and other similar units with a unit price of less than \$5,000, regardless of useful life
- Indirect costs using Federally negotiated indirect cost rate OR de minimis rate

### **Line Items**

Line items for operating expenses must be listed by category, e.g., office supplies, training materials, telephone, etc., and included in the original grant application or approved through the Grant Award Modification (GAM) process prior to obligation of grant funds. Items that are individually represented on inventory logs, items assigned to specific individuals, and non-consumable items, e.g., computers, tablets, printers, etc., must be presented as discrete line items within the VAWA budget to be eligible for reimbursement.

### **Narrative Justification**

The narrative justification field should supplement the information already available on the budget detail pages. At minimum, the narrative justification must indicate the basis for computation for each request as well as a brief discussion of the budget item(s) requested and how the budget costs elements are necessary to implement project activities and accomplish project objectives. The method for pro-rated or allocated costs must be fully described. For example, rental costs could be supported by a computation that considers the total square feet, total agency costs, proportion of funded staff within agency, and allocation percentage. Broader line-item categories should be itemized within the narrative justification field, and it should be clear if the costs will be used as match or funded by the grant.

**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.** Subrecipients are required to maintain supporting documentation for all Operating Expenses. Requirements include, but are not limited to:

- Rental agreements
- Utility bills
- Invoices
- Proof of payment
- Documentation of federally negotiated indirect cost rate, if applicable

### **Equipment**

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., unless the applicant’s policies establish a more restrictive threshold. 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 GAMs prior to purchase.
- 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.
- Applicant has demonstrated the requested equipment is necessary to the successful operation of the

grant project.

- Applicant must submit Equipment Purchase Authorization Form to GMD and receive specific written approval from GMD prior to purchasing equipment.
- Equipment purchases funded with this award must be completed within the first four (4) months of the project unless specific written approval is given by GMD.

**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.

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

- Equipment or capital expenditures not determined by OVW or GMD to be necessary and essential to the delivery of direct service.
- Reimbursement for equipment already owned by the applicant or purchased through another funding source.
- Any costs related to leasing or purchasing of vehicles

**Supporting Documentation – Equipment.** Equipment purchases shall be supported by invoices, photos of equipment, equipment inventory log, procurement audit trail or sole source justification requests, proof of payment to the vendor/supplier, and Equipment Purchase Authorization Form signed by GMD conveying specific written approval to purchase equipment.

### **Procurement Procedures**

Applicants shall use the procurement procedures and regulations as set forth by the Commonwealth of Kentucky, Finance and Administration Cabinet. Additional information can be accessed in KRS Chapter 45A or at <http://finance.ky.gov/services/eprocurement/Pages/default.aspx>.

### **Budget Narrative**

Applicants must submit a detailed 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. Each budget category page also has its own budget narrative field, that must be populated with budget narrative information for the expenses reflected on that page. The budget narrative should provide specific and detailed information to help application reviewers fully understand the budgetary needs of the applicant and is an opportunity to provide additional descriptive information, the rationale for how these elements were identified and how costs are allocated, as well as the ways in which the cost elements support the project’s identified goals. Together, the budget narrative and the budget detail pages should provide a complete financial and qualitative description that supports the proposed project plan.

### **Budget Summary**

The budget summary page is auto-populated with data from the other application pages, and is not able to be altered by the applicant. If errors appear on this section, it often suggests there is a need to review and correct information that is presented on the budget detail pages. If these errors persist or no data appears in this section, it is necessary to contact the IGX helpdesk via [JUSIGX@ky.gov](mailto:JUSIGX@ky.gov).

**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.

### **AWARD RECOMMENDATION PROCESS**

Each application will be reviewed by at least three (3) Subject Matter Experts (SMEs). SMEs will generate reviewer comments for each application, which will be made available to applicants upon request following award notification.

Risk assessments will be completed jointly in IGX by VAWA Program and Financial Administrators. Funding will be prioritized for costs that support the provision of direct services. Targeted percentage reductions may be applied to reach the limit of available funds approved to be awarded under this solicitation.

The Commonwealth will fulfill the allocation requirements as previously detailed in the **Allocation of Subawards** section of this document. Funding decisions will also be guided by Kentucky's goals and priorities as set out in the 2022 – 2026 VAWA Implementation Plan.

### **Award Notification and Acceptance**

**Notification.** Finalization of the grant recommendations must occur with both the JPSC and Office of the Governor prior to the announcement of award decisions. Recipients of awards will be notified by e-mail and will receive further instructions on award acceptance from GMD staff via e-mail, telephone, or other means. Approved applicants may need to make modifications to the original submitted budget, based upon the amount of the actual award. Should this be necessary, additional instructions will be provided by GMD via electronic communication/e-mail. GMD makes every attempt to provide notification in advance of the start of the VAWA award period.

**Budget Modifications.** GMD recognizes that agencies are the experts on the needs of their respective programming. GMD will not be proscriptive with how subrecipients rearrange their application budgets within the award amount during the budget modification phase. With the exception of denying unallowable costs, GMD will encourage subrecipients to reorganize their budgets to best meet the approved project scope and their agency's identified needs.

**Conditions of Award.** 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.** The subrecipient at any tier must promptly refer to GMD, and the Department of Justice (DOJ), Office of the Inspector General (OIG), any credible evidence that a principal, employee, agent, contractor, subcontractor, or other person has, in connection with funds under this subaward - 1) submitted a claim that violates the False Claims Act; or 2) committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

### **Potential fraud, waste, abuse, or misconduct involving or relating to funds under this subaward**

should be reported 1) by mail to:

**Special Investigations  
Internal Investigations Branch  
Kentucky Justice & Public Safety Cabinet  
125 Holmes St  
Frankfort KY 40601**

If awarded VAWA STOP funds, the subrecipient agrees to refer promptly to GMD and to the Department of Justice (DOJ), Office of the Inspector General (OIG) any credible evidence that a principal, employee, agent, contractor, subcontractor, or other person has submitted 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 should be submitted to

Kentucky Justice and Public Safety Cabinet, Grants Management Division  
125 Holmes Street  
Frankfort, KY 40601

**and**

Office of the Inspector General  
US 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 Administrator via e-mail.

If the acceptance process is not completed within the allotted time, GMD reserves the right to withdraw the award. The award document must be signed by the Authorized Official (AO) listed on the contact page.

The applicant agrees to commence project activities within sixty (60) 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. If a project is not operational within 60 days of the approved project start date, the recipient/subrecipient must report by letter to GMD the steps taken to initiate the project, the reasons for the delay, and the expected starting date.

If a project is not operational within 90 days of the approved project start date, the recipient/subrecipient must submit a second statement to GMD explaining the implementation delay. Upon receipt of the 90-day letter, the KJPSC may cancel the project and redistribute the funds to other projects. GMD may also, where extenuating circumstances warrant, extend the implementation date of the project past the 90-day period. When this occurs, the appropriate files and records must so note the extension.

### **Reporting Requirements**

The subrecipient agrees to submit financial and program reports according to the specified deadlines. The

subrecipient must collect and maintain data that measures the performance and effectiveness of work under this award. 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), the GPRA Modernization Act of 2010, and other applicable laws. The schedule for filing reports is as follows:

Reporting Schedule	Performance Period	Reporting Due
Quarter 1	January 1 – March 31	April 15
Quarter 2	April 1 – June 30	July 15
Quarter 3	July 1 – September 30	October 15
Quarter 4	October 1 – December 31	January 15

### Performance Reporting GMD Progress Report

Subrecipients answer narrative questions related to the project activities and progress and also report training received on the quarterly Progress Report submitted in IGX. The Progress Report is due 15 days after the close of each quarter and remains open through the 15<sup>th</sup> of the following month. Reports must be submitted in IGX in the order in which they are due.

### USDOJ, OVA Annual Progress Report (Muskie Report)

Subrecipients are also required to complete and submit an annual progress report after the conclusion of the grant period. The VAWA Program Administrator will provide subrecipients with the form to be completed and notify subrecipients, by email, of the date on which the form must be completed and submitted.

### Financial Reporting

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.

**Supporting Documentation.** Subrecipients shall submit GMD financial reports which include itemized expenses requested for reimbursement. With each Financial Report, the subrecipient is required to attach an explanation of line-item expenses included for reimbursement in the report, using a template provided by GMD. Supporting documentation may be requested at any time by GMD, and unless instructed otherwise, subrecipients shall submit supporting documentation with every financial report. At a minimum, GMD will review at least 2 months of financial supporting documentation for monthly filers and one quarter for quarterly filers.

### Hiring Requirements

To be eligible for reimbursement, the hiring of grant-funded positions, including contract staff who regularly function as agency staff, must fulfill the requirements set forth in the Conditions of the Award to ensure competitiveness and avoid conflicts of interest, including:

- Publicly advertised job posting, ideally in an online posting that is separate from or in addition to subrecipient’s organization website or social media accounts. If subrecipient chooses to advertise in a newspaper, it must be a major publication.

- Job description and requirements must be clearly conveyed in the posting. Where applicable, requirements must follow those outlined in the Kentucky Revised Statutes.
- Competitive interviews must be conducted with at least three candidates interviewed (two of which are external candidates).
- The intended hire's resume should indicate that they meet the minimum requirements of the position.
- Conflict of Interest Disclosure Form or other such comparable documentation addressing potential or actual conflicts of interest, if applicable.
- Verification of active licensure for positions requiring professional licensure
- Adherence to subrecipient's written hiring policies.

A completed GMD Hiring Request Form and required attachments must be submitted to GMD staff, who will review for compliance, prior to a grant-funded position being filled. Documentation supporting all above listed requirements shall be included with the submission of the GMD Hiring Request Form. The final, approved hiring request form, containing appropriate GMD staff signatures, should be uploaded to IGX. Failure to obtain prior approval for the use of grant funds to support a grant-funded position may result in all costs associated with the position being disallowed. Subrecipients may request in writing from GMD a hardship waiver of any of the above Hiring Requirements.

The hiring of grant-funded personnel must be free of undisclosed personal and organizational conflicts of interest, both in fact and appearance. The subrecipient at any tier must immediately disclose to GMD, in writing, any potential conflict of interest as defined in the *DOJ Grants Financial Guide*. Failure to do so may result in withholding of reimbursement, termination of the award, or other appropriate action.

Note: All changes to funded staff must be updated in IGX throughout the award period as they occur.

### Grant Award Modifications

Changes in the overall scope of the project and material changes to the project and budget are unallowable without prior written approval from GMD. The purpose of a Grant Award Modification (GAM) is to update award details, modifying key facts or details about the award. The following changes require a GAM:

1. **Change in Agency Representative/CEO, Project Director/Contact, or Financial Officer.** Updates to any key project contact listed on the Contact Information page in IGX are reflected through the GAM process.
2. **Update award to reflect grant-funded staff resignations, terminations, and new hires.** GMD shall be notified in writing of all employee resignations or terminations within 30 days of occurrence. Subrecipients are required to follow the hiring requirements specified in award conditions for grant-funded personnel and contractual staff.
3. **Budget revision.** Approval of a GAM request must be obtained prior to any obligation of grant funds not already approved in the most current version of the award documents. Revisions will not be retroactive.
4. **Project period extension.** GMD will notify subrecipients if a no-cost extension has been granted by the Federal funder and convey related GAM process if available.

GAM requests for VAWA award must be submitted by October 30th of the grant year unless otherwise approved by GMD. Exceptions to the October 31st deadline for GAM request submissions are those to update an award's Contact Information page or to reflect funded staff resignations, terminations, or hires



conducted in accordance with the hiring requirements established in the award conditions.

A Federal award agreement creates a legal and binding obligation for direct recipients and subrecipients to use the award as outlined in the agreement. The USDOJ considers the deliberate redirection of the use of funds in a manner different from the purpose outlined in the award agreement a failure to properly support the use of award funds, which constitutes misuse of award funds. More information is contained in the *DOJ Grants Financial Guide*, Section III. Post-Award Requirements, 3.20 Grant Fraud, Waste, and Abuse, Common Grant Fraud Schemes.

### **GAM Process**

The GAM process employed by GMD begins through written correspondence between the subrecipient and assigned grant administrators. The subrecipient must submit a detailed budget spreadsheet and narrative of the proposed changes. After GMD has provided preliminary approval, the subrecipient may initiate the Grant Award Modification Request in IGX. GMD staff will then open the award documents for editing to allow the subrecipient to make the changes as approved in preliminary discussions with the assigned Program and Financial Administrators. GMD staff will perform a final review and will approve, deny, or request corrections to the GAM request. The award will be returned to Award Approved status upon final approval of the GAM changes.

Subrecipients and GMD staff are expected to process GAMs prior to the filing of the next financial report in which any tentatively approved GAM changes are reflected as expenditures. Please note that any IGX award status involving a GAM prohibits subrecipients from filing a financial report. If the initiation of a GAM would prevent a subrecipient to file a financial report by the specified deadline, subrecipients must communicate with assigned VAWA Financial Administrator to determine the appropriate sequence of actions. GMD may advise the subrecipient to file the GAM request immediately after the financial report is submitted.

### **Training**

All VAWA funded staff, including those applied as match, are required to 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. If a new staff member is added to the project late in the award period, subrecipients may contact GMD to discuss the possible proration of the training requirement.

## 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.

### PERSONNEL

#### *Salaries*

- Is each position identified by title? *Example:* FT Victim Advocate (TBH)
- Are time commitments stated?
- Is the amount of each employee's annual compensation stated?
- Are there any dual personnel compensation costs?
- Has a job description and resume been attached to each personnel page?
- Are salary increases anticipated during the grant period? If so, are the increases justified in the narrative?

#### *Benefits*

- Is each benefit type indicated separately?
- Have the requests been cost allocated, when appropriate?
- Are the listed benefits available to all employees of the agency?
- Are fringe benefit increases anticipated during the grant period? If so, are the increases justified in the narrative?
- Have the computations used to arrive at requested amounts been included in the narrative?

### CONTRACTUAL SERVICES

- Is each service described?
- For individual consultants, has an hourly or daily rate been conveyed in the narrative?
- Is the compensation rate for individual consultants within the maximum allowable compensation rate?
- Are base rates justified and reasonable?
- Does the total value of any contractual service exceed the procurement threshold of the Commonwealth or that of the applicant agency? If so, has the applicant indicated that services have been or will be obtained by acceptable procurement procedures?
- If the applicant plans to submit a sole source justification request to GMD, has this been indicated in the narrative?
- Have the computations used to arrive at requested amounts been included in the narrative?

### TRAVEL/TRAINING

- 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 methods been selected?
- Have the appropriate project personnel been identified for the travel?
- Have the computations used to arrive at requested amount been included in the narrative?

### OPERATING EXPENSES

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

**EQUIPMENT**

- 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 allocated across funding sources and calculations provided?
- Does the agency already own any equipment suitable for the project?
- Does the total value of any equipment exceed the procurement threshold of the Commonwealth or that of the applicant agency? If so, has the applicant indicated that services have been or will be obtained by acceptable procurement procedures?
- If the applicant plans to submit a sole source justification request to GMD, has this been indicated in the narrative?

**SOURCE OF MATCH**

- Is the source of match identified?
- Is the minimum (25%) cash or in-kind match requirement met for currently funded projects, if required?

**BUDGET SUMMARY**

- Are all requested costs justified, reasonable and allowable?
- Are requested costs properly categorized?
- Are all line-item calculations correct and equal the category totals?
- Have the appropriate costs/percentages been identified as federal and match?
- Have the computations used to arrive at requested amount been included in the narrative.