



VAWA 2023

APPLICATION GUIDELINES AND INSTRUCTIONS

**Violence Against Women Act (VAWA) STOP
Formula Grant Program**

Assistance Listing Number: 16.588

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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, 2019 and 2022). 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.

AWARD PERIOD

The standard award period is one calendar year (12) months. For 2023, the award period will be January 1, 2024, through December 31, 2024.

APPLICATION OPEN PERIOD DATES

The VAWA 2023 subgrant application opportunity will open on Tuesday, August 1, 2023, and close on Friday, September 15, 2023, 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	Approx. \$2.2 million
Amount awarded under previous solicitation	Approx. \$1.95 million
Period of Performance Start/End Date	1/1/2024 – 12/31/2024
Period of Performance Duration	12 months

FEDERAL AWARDS ANTICIPATED FOR USE

15JOVW-22-GG-00425-STOP; 2023 (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 JPSC’s 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"> • Initiate and populate grant application • Submit grant application • Add or remove users from your agency account • Sign the award binder • Create and submit a Grant Award Modification (GAM) request • Create and submit progress reports • Create and submit financial reports
Grant Administrator (GA)	<ul style="list-style-type: none"> • Initiate and populate grant application • Note: This role cannot submit application • Create and submit a Grant Award Modification (GAM) request • Modify contact information, general information, and budget pages during “GAM Modification in Process” status • Create and submit progress reports • Create and submit financial reports

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.

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)*, 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 UEs 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 include a copy of their SAM Entity Information as an attachment to the application.**

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.

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 appropriate use of nonimmigrant status under subparagraphs (T) and (U) of section 101 (a)(15) of the

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- Immigration and Nationality Act (8 U.S.C. § 1101(a)(15)).
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 domestic violence, dating violence, sexual assault, 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 domestic violence, dating violence, sexual assault, and stalking, as well as the appropriate treatment of victims including implementation of the grant conditions in section 40002(b) of the Violence Against Women Act of 1994 (34 U.S.C. 12291(b));
 4. 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 and legal assistance 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 domestic violence, dating violence, sexual assault, and stalking.
 5. 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.
 6. 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.
 7. Developing, enlarging, or strengthening programs to assist law enforcement, prosecutors, courts, and others to address the needs and circumstances of individuals 50 years of age and over, individuals with disabilities, and Deaf individuals who are victims of domestic violence, dating violence, sexual assault, or stalking, including recognizing, investigating, and prosecuting instances of such violence or assault and targeting outreach and support, counseling, legal assistance and other victim services to such individuals.
 8. Providing assistance to victims of domestic violence and sexual assault in immigration matters.
 9. Maintaining core victim services and criminal justice initiatives, while supporting complementary new initiatives and emergency services for victims and their families, including rehabilitative work with offenders.
 10. 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.
 11. Developing, implementing, or enhancing Sexual Assault Response Teams, or other similar coordinated community responses to sexual assault.
 12. 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.

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13. Developing, enlarging, or strengthening programs addressing sexual assault against men, women, and youth in correctional and detention settings.
14. 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.
15. Developing, enlarging, or strengthening programs and projects to provide services and responses targeting male and female victims of domestic violence, dating violence, sexual assault, or 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 of the United States Code.
16. Developing, enhancing, or strengthening prevention and educational programming to address domestic violence, dating violence, sexual assault, stalking, or female genital mutilation, or cutting, with not more than 5 percent of the amount allocated to a state to be used for this purpose.
17. Developing, enhancing, or strengthening programs and projects to improve evidence collection methods for victims of domestic violence, dating violence, sexual assault, or stalking, including through funding for technology that better detects bruising and injuries across skin tones and related training.
18. Developing, enlarging, or strengthening culturally specific victim services programs to provide culturally specific victim services and responses to female genital mutilation or cutting.
19. Paying any fees charged by any governmental authority for furnishing a victim or the child of a victim with any of the following documents: (A) A birth certificate or passport of the individual as required by law. (B) An identification card issued to the individual by a State or Tribe, that shows that the individual is a resident of the State or a member of the Tribe.

Federal VAWA STOP Program Priorities

In FY 2023, The Office on Violence Against Women (OVW) is interested in supporting the following priority areas identified below. In shaping their strategies for FY 2023, 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/Documents/Old%20Site/VAWA/2023%20VAWA%20Final%20Implementation%20Plan%20approved%20with%20attachments.pdf>

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 and Organizational Capacity.** Eligible organizations must also demonstrate a record of providing effective services and organizational 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

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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>.
8. **Demographic Data.** 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.
9. **Delivery of Legal Assistance Certification Letter.** Pursuant to 34 U.S.C. § 12291(b)(12), to be eligible for an award, any recipient or subrecipient providing legal assistance with funds awarded under this program must certify in writing that:
 1. any person providing legal assistance with funds through this program – (A)
 - (i) is a licensed attorney or is working under the direct supervision of a licensed attorney;
 - (ii) in immigration proceedings, is a Board of Immigration Appeals accredited representative;
 - (iii) in Veterans’ Administration claims, is an accredited representative; or (iv) is any person who functions as an attorney or lay advocate in Tribal court; and (B)(i) has demonstrated expertise in providing legal assistance to victims of domestic violence, dating violence, sexual assault, or stalking in the targeted population; or (ii)(I) is partnered with an entity or person that has demonstrated expertise described in clause (i); and (II) has completed, or will complete, training in connection with domestic violence, dating violence, stalking, or sexual assault and related legal issues, including training on evidence-based risk factors for domestic and dating violence homicide;
 2. any training program conducted in satisfaction of the requirement of paragraph (1) has been or will be developed with input from and in collaboration with a tribal, state, territorial, local, or culturally specific domestic violence, dating violence, sexual assault or stalking victim service provider or coalition, as well as appropriate tribal, state, territorial, and local law enforcement officials;
 3. any person or organization providing legal assistance with funds through this program has informed and will continue to inform state, local, or tribal domestic violence, dating violence, or sexual assault programs and coalitions, as well as appropriate state and local law enforcement officials of their work; and
 4. the grantee’s organizational policies do not require mediation or counseling involving offenders and victims physically together, in cases where sexual assault, domestic violence, dating violence, stalking, or child sexual abuse is an issue.

10. Prosecution Certification. Beginning with the 2023 subawards, all prosecutor's offices receiving funds awarded under this program must certify in writing that they will, within three years of the date of the initial subgrant, begin to engage in planning, developing, and implementing:

- training developed by experts in the field regarding victim-centered approaches in domestic violence, sexual assault, dating violence, and stalking cases;
- policies that support a victim-centered approach, informed by such training; and
- a protocol outlining alternative practices and procedures for material witness petitions and bench warrants, consistent with best practices, that shall be exhausted before employing material witness petitions and bench warrants to obtain victim-witness testimony in the investigation, prosecution, and trial of a crime.

Prosecutor's offices must also certify that they understand that the required planning, development, and implementation must be completed by the end of a third VAWA STOP award period to be eligible to continue to receive VAWA STOP funding.

11. Determination of Suitability Required, in Advance, for Certain Individuals who may for Interact 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.

12. 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](#).

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

Special Conditions of the Application or Award.

14. **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.
15. **Confidentiality of Statistical and Research Information.** Except as otherwise provided by federal law, no recipient of monies under VAWA shall use or reveal any statistical information furnished under this program by any person and identifiable to any specific private person for any purpose other than the purpose for which such information was obtained in accordance with VAWA. Such information, and any copy of such information, shall be immune from legal process and shall not, without the consent of the person furnishing such information, be admitted as evidence, or used for any purpose in any action, suit, or other judicial, legislative, or administrative proceeding. See Section 1407(d) of VAWA codified at 42 U.S.C. 10604.

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

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

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

17. **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.
18. **Faith-based Organization Personnel Practices.** Faith-based organizations asserting hiring practices on the basis of religion must download, complete, and sign the USDOJ OJP *Certification Regarding Hiring Practices on the Basis of Religion* form and upload it to the application. The form can be accessed at the following link: <https://www.ojp.gov/sites/g/files/xyckuh241/files/media/document/certificationregardinghirin g.pdf>.
19. **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

- This grant opportunity is named for the Violence Against Women Act STOP Formula Grant Program, the federal program administered by OVW through which subaward funds advertised in this opportunity are made available. Nothing in the Violence Against Women Act shall be construed to prohibit all victims of domestic violence, dating violence, sexual assault and stalking from receiving STOP Program funded services, without regard to sex or gender identity.
- 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 staking, 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 a 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. 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. The 10% rate is also known as a “de minimis” indirect cost rate. See 2 C.F.R. §200.1 more information on MTDC. [eCFR :: 2 CFR 200.1 -- Definitions.](https://www.ecfr.gov/current/title-2/chapter-200/subchapter-1/part-200.1)

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 <https://www.govregs.com/regulations/2/200.403>.

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;
- Civil legal representation in a lawsuit based on a tort claim;
- 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
<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+%2011-43-00%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 for the 2023 Project Period, and once specified, this interval shall remain consistent over the project's period of performance. Beginning with the 2024 Project Period, requests for reimbursement shall only be made on a quarterly basis, so please **begin preparing now for that change in JPSC policy**. 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. The financial records must account for all charges paid for with federal funding and demonstrate how the charges support the objectives of the awards. 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, including justification for sole source contracts
- Expenditures

The accounting system shall 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. [2 CFR § 200.303 Internal controls - Code of Federal Regulations \(ecfr.io\)](#).

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 shall 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 VAWA funds and match (both cash and in-kind) are used only for allowable services. 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. [eCFR :: 2 CFR 200.405 -- Allocable costs](#).

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 has the 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 VAWA 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 INSTRUCTIONS

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

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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.

Prosecutor Certification. All prosecutor's offices receiving funds awarded under this program must certify in writing that they will within begin to engage in planning, developing, and implementing the training, protocol and policies required by the federal award condition and that they understand these must be completed within three years in order to remain eligible to receive VAWA STOP funding. A sample certification letter is available on the application page for download.

Legal Assistance Certification Letter. Any subrecipient providing legal services with funds awarded under this program must upload a certification letter to the application to demonstrate compliance with this federal award condition. A sample certification letter is available on the application page for download.

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.

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.

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

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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.

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/Documents/Old%20Site/VAWA/2023%20VAWA%20Final%20Implementation%20Plan%20approved%20with%20attachments.pdf>

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.

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- 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.
- For further assistance with developing a proposal, please see [Grhttps://www.ojp.gov/funding/grants101/write-proposal-overview](https://www.ojp.gov/funding/grants101/write-proposal-overview) 101 | [Write the Proposal \(Overview\) | Office of Justice Programs \(ojp.gov\)](#).

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.

- Non-victim service provider agencies must describe how the agency consulted with victim services during the course of developing the grant application to ensure that the proposed activities promote safety, confidentiality and economic independence of victims. *This information is **mandatory** for non-victim service provider applicants.*
- 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.

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 2022 | III. Postaward Requirements | Office of Justice Programs \(ojp.gov\)](#). 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.

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 position, percentage of the employee's time devoted to project activities, and total budgeted cost for the position. 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). If awarded, a Staff Tracking form page will be added to your application during the budget modification please to capture specific information about grant-funded individuals.

- 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 time and activity reports. These reports shall be accurate and clearly demonstrate how time was cost allocated.
- 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.
- A job description must be submitted for each requested position.

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- Job descriptions for 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 and support the total time being recorded for the employee, both VAWA funded and non-VAWA funded.
- 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.

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.

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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 personnel costs are supported by multiple funding sources, personnel must keep timesheets that demonstrate the appropriate allocation of cost across funding sources.
- 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.
- 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.
- **Volunteer 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 VAWA-allowable activities are being applied as match.

- **Paystubs, invoices and proof of payment** for fringe benefits reflecting the actual costs paid by the employer.

Contractual Services

Compensation for individual consultant rates may not 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. Travel and subsistence costs may also be paid. Issuance of an award or approval of the award budget alone does not convey approval of a compensation rate that exceeds the established maximum. If the compensation rate for an individual consultant is not within the maximum compensation rate, none of the costs associated with the contractual expense are allowable costs to an award.

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 VAWA program for work performed during a single period of time even though the services performed benefit both).
- The contractual agreement is written, formally executed and otherwise consistent with the applicant's usual practices.
- If noncompetitive or “sole source” procurement is used, the applicant’s written procurement policy must be followed, including documentation of justification and approval which must be retained for compliance monitoring. See [2 CFR 200.320.](#), the DOC Grants Financial Guide Section 3.8 [DOJ Grants Financial Guide \(ojp.gov\)](#), and conditions of award for additional requirements around noncompetitive procurement. **If the applicant elects not to establish a procurement policy of their own, they must adopt the Kentucky Model Procurement Code found in KRS 45A.** If there is a conflict among policies, the most restrictive policy shall be followed.
- 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 as an attachment to the next financial report after execution of the contract. Documentation demonstrating how the contract was procured shall be maintained by the subrecipient and available for review during monitoring or upon request. 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.

Any conferences held by subrecipient and paid for with grant funds shall be outlined in detail in the budget submission and submitted on the next financial report after execution of the conference.

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

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- 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 required statement of acknowledgement contained in contract terms and conditions.
- 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. *As a best practice, applicants are encouraged to put “small and attractive” items costing more than \$250 onto inventory logs to avoid pilfering.*

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. The language provided shall be sufficient to justify the cost and clearly explain the necessity to further the objectives of the award.

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

- Direct costs if any other costs incurred for the same purposes in like circumstances have been allocated as indirect costs. See [2 CFR 200.403](#)
- Technology costs that comprise an Information technology system (as defined in [2 CFR 200.1 -- Definitions.](#)) with a total cost greater than \$5,000 (must be classified as Equipment).
- 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.

- Technology costs that comprise an Information technology system (as defined in [2 CFR 200.1 -- Definitions.](#)) with a total cost greater than \$5,000 (must be classified as Equipment).

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.
- Items of equipment may include information technology systems as defined by 2 CFR 200.1.
- 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.

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The subrecipient is required to track all equipment purchases and to be able to produce an inventory list upon request by GMD. The subrecipient must follow 2 C.F.R. § 200.313 and 2 C.F.R. § 200.439.

For additional guidance around procurement, see Guide to Procurements Under DOJ Grants and Cooperative Agreements (revised November 2020) at <https://www.ojp.gov/doj-guide-to-procurement-procedures>.

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.

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.

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 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. Budget modifications must be completed in a timely fashion to ensure award acceptance before the beginning of the project period.

Conditions of Award. Once budget modifications have been completed and the subaward assigned to a federal award, award documents will be generated that include terms and conditions of the contract. If the subaward is accepted, the subrecipient must agree to all terms and conditions. Subrecipients are encouraged to carefully read and understand the conditions as presented in the contract prior to accepting the award. Questions may be directed to GMD staff.

Fraud, Waste or Abuse. If awarded VAWA STOP funds, the subrecipient agrees to refer promptly to JPSC and to the US 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 the contract, submitted a false claim under the False Claims Act, or committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct.

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Potential fraud, waste, abuse, or misconduct involving or relating to funds under the contract should be reported to GMD through the Justice Listens contact page accessible at <https://justice.ky.gov/About/justicelistens/Pages/contactjl.aspx>, and to OIG by--(1) online submission accessible via the OIG webpage at <https://oig.justice.gov/hotline/contact-grants.htm> (select "Submit Report Online"); (2) mail directed to: U.S. Department of Justice, Office of the Inspector General, Investigations Division, ATTN: Grantee Reporting, 950 Pennsylvania Ave., NW, Washington, DC 20530; and/or (3) by facsimile directed to the DOJ OIG Investigations Division (Attn: Grantee Reporting) at (202) 616-9881 (fax). Additional information is available from the DOJ/OIG website at <https://oig.justice.gov/hotline>.

Award Acceptance. If selected to receive an award, the applicant must complete budget modifications by the deadline specified by the Cabinet at the time of award notification. The applicant must accept the award by signing the offered contract **NO LATER THAN NINE (9) CALENDAR DAYS PRIOR TO THE BEGINNING OF THE PROJECT PERIOD.**

If the acceptance process is not completed within the allotted time, **THE APPLICANT WILL BE INELIGIBLE TO BILL TO THE GRANT ANY EXPENSE INCURRED BEFORE THE DATE OF ACCEPTANCE.**

The applicant agrees to commence project activities within sixty days of the approved project start date. Non-commencement of project activities may lead to cancellation of the grant award. Evidence of project commencement shall be included in the first quarter Progress Report.

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, JPSC 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 15th of the following month. Reports must be submitted in IGX in the order in which they are due.

USDOJ, OVW 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. **Beginning with the 2024 project period, requests for reimbursements shall only be made on a quarterly basis, so please begin preparing now for that change in JPSC policy.**

Supporting Documentation. Subrecipients shall submit GMD financial reports and a Financial Report Detail Form which include itemized expenses expenditures for the reporting period and will provide a more detailed breakdown of all expenditures by budget item line (instead of simply providing an aggregate for each budget category). Itemized expenses included on the form should correspond to the line items in the approved subaward budget (and also easily tie back to the grant ledger). The submitted form should also reflect the cash and in-kind match being reported, if applicable, and the federal share reimbursement request included for that particular reporting period. Supporting documentation may be requested at any time by GMD, and unless instructed otherwise, subrecipients shall submit supporting documentation with every financial report.

Hiring Requirements and Staff Reporting

Applicants must screen for employment eligibility in the United States, as well as adhere to the applicant's own written hiring policies and procedures, and any statutory or regulatory requirements, when hiring for grant-funded positions.

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 2022 | III. Postaward Requirements | Office of Justice Programs \(ojp.gov\)](#). Failure to do so may result in withholding of reimbursement, termination of the award, or other

appropriate action.

GMD shall be notified in writing of all employee resignations or terminations within 30 days of occurrence, via revision of the Staff Tracking Form in IGX. This editable form will be available throughout the life of the award and allow the subrecipient to maintain an active roster of project staff.

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. **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.
3. **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 close of business October 31st of the grant year unless otherwise approved by GMD. Possible 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 2022 | III. Postaward Requirements | Office of Justice Programs \(ojp.gov\)](#) 3.20 Grant Fraud, Waste, 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.

Risk Assessment and Monitoring

2 CFR 200.332(b) states that “all pass-through entities must ... evaluate each subrecipient’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for the purposes of determining the appropriate subrecipient monitoring.”

The *Subrecipient Financial and Risk Assessment Questionnaire* is a tool completed annually by prospective and current subrecipients in *Intelligents 10.0* (IGX), JPSC GMD’s electronic grants management system. The questionnaire assesses applicant eligibility to receive federal funds and guides JPSC GMD staff in determining the risk level designation for each organization based on general, programmatic, and financial risk factors.

A total risk score will be calculated by the IGX system based on subrecipient responses and the corresponding risk level will be assigned. The risk level resulting from an agency’s most recent risk assessment score determines the frequency at which the organization is required to submit financial supporting documentation for desk review with Financial Reports, GMD’s on-site compliance monitoring schedule, and participation requirements for additional training or technical assistance provided by GMD.

Organizational responses are valid for one year following certification and apply to ALL subawards received by the organization during the year. It is not necessary for an organization to resubmit questionnaire responses during an active award period or upon receipt of a new subaward issued by JPSC GMD.

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 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? Does the sole source request follow the applicant's written noncompetitive procurement policies and procedures?
- 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.)?

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- Are unit costs or monthly estimates provided?
- Will appropriate procurement procedures be followed?
- Have the computations used to arrive at requested amounts been included in the narrative?

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 \$5000 or the procurement threshold 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? Does the sole source request follow the applicant's written noncompetitive procurement policies and procedures?

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.