

**Victims of Crime Act (VOCA)
Victim Assistance Formula Grant
Assistance Listing Number: 16.575**

2023-2024 Application Guidelines and Instructions

**Kentucky Justice & Public Safety Cabinet
Grants Management Division
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State Administering Agency

Kentucky Justice & Public Safety Cabinet
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Introduction

The primary objective of the Victims of Crime Act (VOCA) Victim Assistance Formula Grant Program is to provide direct assistance to victims of crime. That assistance is achieved through a variety of methods, including local government, private nonprofit organizations enhancing or expanding their direct services to victims of crime, encouraging states to improve assistance to crime victims and promoting the development of comprehensive services to all victims of crime.

This solicitation establishes the program and financial policy as well as providing administrative guidance to effectively manage VOCA Victim Assistance Formula Grants. There are additional instructions for the VOCA application, grant management processes and post-award requirements within the body of this document.

The Program & Financial Guidelines and Instructions are consistent with the U.S. Department of Justice (USDOJ) Office for Victims of Crime (OVC), and the Victims of Crime Act (VOCA) of 1984 ([34 U.S.C. § 20103](#)). Funds distributed by USDOJ 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 and JPSC.

Award Period

The standard award period is one year (12 months). For applications submitted in 2023, the award period will be October 1, 2023, through September 30, 2024.

Application Open Period Dates

The VOCA 2023-2024 subgrant application opportunity will open on Monday, April 3rd, 2023, and close on Friday, May 19th, 2023, at 6:00 pm ET.

Subaward Information

Period of Performance Start/End Dates	October 1, 2023–September 30, 2024
Period of Performance Duration	12 months

Federal Awards Anticipated for Use

Federal Award Number	Period of Performance Start/End Dates
15POVC-22-GG-00749-ASSI	October 1, 2021 – September 30, 2025
Kentucky VOCA Assistance FY23	October 1, 2022 – September 30, 2026

The amount of VOCA funding each state receives is controlled by deposits of non-tax revenue into the [Crime Victims Fund](#) established by the Victims of Crime Act of 1984. Deposits have been at historically low levels since 2018. Kentucky JPSC anticipates making approximately \$17 million in VOCA subawards for the 2023-24 project period. Applicants should plan their VOCA

Assistance applications accordingly, and also take into consideration the concurrent release of the ARPA application for funding to supplement VOCA victim service projects. Applicants should target their reoccurring costs for funding through the Federal VOCA award, and any one-time project costs for funding through the ARPA/VOCA supplement application, to ensure baseline items continue to be captured in ongoing Federal funding requests.

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

Electronic Grants Management System

All grant activities are managed through the Kentucky Justice & Public Safety Cabinet (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. Applicants must establish user accounts at <http://kyjusticeigx.intelligrants.com>. Please note validation of new user accounts will take 48-72 business hours.

Each *IGX* 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 individuals within your organization based 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 segregation 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 Modifications 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 confirmation e-mail 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 *IGX*, the JPSC's electronic Grants Management System. Major points must be supported by current local facts and data, with appropriate citations. **Be sure to read the instructions at the top of each page of the application before populating and saving.** The precision with which the applicant follows the instructions for each section of the application is an important factor in application review. Most *IGX* text box application pages will track character limits (number of letters utilized) and display the maximum number of characters allowed per text box. It is highly recommended that agencies use a separate document to create the application for several reasons. Word processing software 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 to prevent information being lost after a period of inactivity.

System for Award Management Unique Entity Identifier

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

Memorandums of Understanding

All submissions must include three (3) original memorandums of understanding (MOU) with other victim-related agencies within your community. MOUs 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.

Match Waiver

The "VOCA Fix to Sustain the Crime Victims Fund Act of 2021" requires the following: "Beginning on the date a national emergency is declared under the National Emergencies Act ([50 U.S.C. 1601](#) et seq.) with respect to a pandemic and ending on the date that is one year after the date of the end of such national emergency, each chief executive shall issue waivers for any matching requirement, in its entirety, for all eligible crime victim assistance programs contracted to provide services at that time." Therefore, the matching requirement for this grant opportunity has been waived in full for the 2023-2024 period of performance by the JPSC GMD Division Director. A Match Waiver Determination Letter from the Director documenting this waiver will be attached by GMD to each approved subaward in IGX. This match waiver shall cover the entire period of performance, regardless of when the National Pandemic State of Emergency ends.

Allocation of Subawards

A Priority Program has been defined by the Office of Victims of Crime as one whose principal mission is to offer comprehensive specialized services tailored to the special needs of one or more priority category victims. Pursuant to [28 C.F.R. § 94.104\(b\)](#), State Administering Agencies (SAAs) of federal VOCA awards must certify that priority shall be given to eligible crime victim assistance programs providing assistance to victims of sexual assault, spousal abuse, and child abuse. SAAs shall allocate a minimum of ten percent (10%) of each year's VOCA grant to each of the three priority categories, meaning at least thirty percent (30%) total will be allocated to "priority categories."

SAAAs are further required to allocate a minimum of ten percent (10%) of each year's grant to underserved victims of violent crime. The Commonwealth of Kentucky defines its previously underserved victim populations as any of the following: survivors of homicide; elderly victims of abuse; survivors of incest; victims of financial crimes including identity theft; victims of robbery and other forms of violence against persons, including victims of drug and alcohol related crime; victims of ritualistic abuse, and victims of juvenile crime. States are encouraged also to identify gaps in available services by victims' demographic characteristics, including (but not limited to) tribal, disenfranchised male victims of color, LGBTQ, victims of sexual assault on college campuses, non-English speaking residents, persons with disabilities, members of racial or ethnic minorities, or by virtue of residing in rural or remote areas or inner cities. Please note OVC has determined that victims who fall under the first three priority categories (sexual assault, spousal abuse, and child abuse) will not be eligible for consideration under the category of "previously underserved."

In determining the funding needs of programs serving priority victims, the Commonwealth considers other funding options that may be available or in place for priority program areas, as well as the needs and availability of services in the state for other categories of crime victims.

ELIGIBILITY AND REQUIREMENTS

The Victims of Crime Act (VOCA) establishes eligibility criteria that must be met by organizations requesting VOCA funds. Eligible subrecipients include victim services organizations whose sole mission is to provide services to crime victims. There are special provisions for faith-based organizations, neighborhood programs, and crime victim compensation programs as indicated in the federal Final Rule for the Victims of Crime Act Victim Assistance Program (see [28 C.F.R. § 94](#)). VOCA funds shall be available to provide direct services and supporting and administrative activities.

- Subrecipients must provide services to victims of federal crimes on the same basis as to victims of crimes under State or local law.
- Subrecipients may provide direct services regardless of a victim's participation in the criminal justice process.
- Subrecipients may not make direct services supported by this program contingent upon a victim's participation in the criminal justice process.
- Victim eligibility for direct services under this program is not dependent on the victim's immigration status.

Agencies whose mission is not focused on serving crime victims may still receive VOCA funds. However, the agency must have a record of providing direct services to crime victims and a minimum of 25% of financial support from other sources. Furthermore, the direct services program or project being proposed must have a means of identifying crime victims within the agency's service population and a plan for providing VOCA-allowable services related to their victimization.

Court Appointed Special Advocate (CASA) Programs

Court Appointed Special Advocate (CASA) programs are eligible to receive funding to support services to victims of crime. OVC views Child Physical Abuse or Neglect, Child Pornography, and Child Sexual Abuse/Assault as serious crimes that have the potential for severe harm to children. OVC's definition of Child Physical Abuse or Neglect includes (but is not limited to) the following categories of victimization: abandonment, child neglect, endangering the welfare of a child, exposure to drugs/alcohol, violent or nonviolent child abuse, and violent or nonviolent child cruelty. CASA programs may use VOCA funds to support services to child victims of any of the victimizations included in the [OVC Performance Measure Dictionary and Terminology Resource, Part IV: Victimization Experienced](#). VOCA funds may support costs including, but not limited to, the salary of a coordinator of volunteers within a CASA program whose responsibilities may include supervising and training all CASA volunteers.

Legal Assistance Services

Victim assistance programs can allow for legal assistance services on a non-emergency and emergency basis where reasonable and where the need for such services arises as a direct result of the victimization, to include legal assistance with victim-related family law matters and other non-tort legal services in a civil context. Such non-tort, civil legal services include, but are not limited to, assistance in divorce, and child custody and support proceedings stemming from crime victimization. The VOCA Rule prohibits those costs for criminal defense and tort lawsuits. JPSC does not allow eligibility for funded services to be contingent upon income level. Therefore, any legal assistance program that screens for income level must screen for crime victimization first and divert VOCA-eligible clients to the funded program.

Substance Abuse Prevention

JPSC VOCA Victim Assistance Funds may not be used in support of Casey's Law facilitation activities. However, JPSC recognizes the significant intersection between criminal victimization and substance abuse, as well as an increasing body of evidence supporting a direct relationship between substance abuse and revictimization. In response, many law enforcement-based victim advocacy programs have begun to employ initiatives allowing individuals struggling with substance abuse to present themselves to a law enforcement officer or agency to receive assistance locating treatment, with no questions asked or charges filed regarding possession of illegal substances or related paraphernalia.

For grant purposes, GMD would only consider programs of this type carried out by law enforcement-based victim advocacy programs as prevention activities. To be eligible for reimbursement under the VOCA program, the following criteria must be met:

- Any screening for substance abuse-related issues must occur at the same time as the individual is initially screened for eligibility for other funded services.
- The victim advocate provides information about available treatment options, including referral to and assistance locating appropriate treatment services.
- Grant-funded victim service staff may not directly transport individuals to treatment.

To be eligible for VOCA funding for these activities, applicants must display sufficient policies and procedures and specialized expertise to properly administer this program. Applicants must also be able to provide documentation reflecting approval of the program by the agency's governing body. Additionally, applicants may not allocate more than 5% of any single staff member's job duties to these prevention activities, nor may applicants allocate more than 5% of grant-funded costs to these activities. The creation or duplication of program materials is allowable under the VOCA rule, but the applicant must seek specific approval from GMD prior to engaging these services. Costs to print materials focused solely on the provision of substance

abuse related programming or services should be proportionately distributed across relevant funding sources and cannot be fully supported by VOCA funds.

Program Requirements

Each subrecipient organization shall meet the program requirements established in 28 C.F.R. § 94.111 – 94.115, accessible at <https://www.ecfr.gov/current/title-28/chapter-I/part-94>:

- 1. Public or Nonprofit Organization.** To receive VOCA funds, organizations must be public or nonprofit or a combination thereof and provide direct services to crime victims. All subrecipients of VOCA Assistance funding are required to certify their nonprofit status by submitting a statement to GMD within 45 days of the award period start date of October 1. The nonprofit certification must include one of the following:
 - A copy of the recipient's IRS 501(c)(3) designation letter,
 - A letter from the recipient's state/territory taxing body or state/territory attorney general affirming that the recipient is a nonprofit organization operating within the state/territory, OR
 - A copy of the recipient's state/territory certificate of incorporation that substantiates its nonprofit status.
- 2. Record of Effective Services and Organizational Capacity.** Eligible organizations must also demonstrate a record of effective services and organizational capacity to administer the project. Applicants should show support and approval of their direct services by the community, a history of providing direct services in a cost-effective manner, and substantial financial support from sources other than the Crime Victims Fund. A program has substantial financial support from other sources when at least twenty-five percent (25%) of the program's funding in the year of, or the year preceding the award comes from sources other than the Crime Victims Fund, which may include other federal funding programs.
- 3. Volunteers, Community Efforts, and Compensation Assistance.** To be eligible for VOCA funds, programs are required to use volunteers for at least 50 hours of service to the program. *Programs for which volunteer usage presents a hardship may include a hardship waiver request as an attachment to their application.*

Promotion of community efforts to aid crime victims is encouraged through a variety of means, including public and private efforts to oversee and recommend improvements to community responses to crime victims and developing written agreements and protocols for such responses.

Crime Victims Compensation Application Assistance Requirement. Programs supported by VOCA Assistance funds are required by federal law to provide assistance to victims in applying for crime victim compensation benefits (including potential recipients who are

victims of federal crime). Such assistance may include identifying and notifying crime victims of the availability of compensation; assisting victims with application forms and procedures; obtaining necessary documentation, and/or checking on claim status. Such assistance services shall be reported in the OVC Performance Measurement Tool. To be counted as reportable services, the program must provide substantive assistance to the client in applying for Compensation. Such assistance may be reported regardless of whether the client submits their completed application. For additional guidance surrounding crime victims compensation, or to obtain contact information for the Crime Victims Compensation Board (CVCB), visit https://kycc.ky.gov/newstatic_info.aspx?static_id=158&menuid=20.

4. **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 Department of Justice funds such as Victim of Crime Act (VOCA) 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.
5. **Non-disclosure of confidential or private information.** SAAs and subrecipients of VOCA 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 VOCA 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.

Additional requirements are outlined below:

Federal Civil Rights Training. Subrecipients must view the OJP Civil Rights Non-Discrimination Training, accessible online at <https://www.ojp.gov/program/civil-rights/online-training>. Subrecipients acknowledge viewing the OJP Civil Rights Non-Discrimination training with submission of signed VOCA Award Documents. OJP Civil Rights Non-Discrimination Training (six training videos) can be viewed on the OJP website at <https://www.ojp.gov/program/civil-rights/online-training>. Subrecipients must maintain statutorily required demographic data on victims served – by race, national origin, sex, 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. This requirement is waived when providing a service, such as telephone counseling, where soliciting the information may be inappropriate or offensive to the crime victim. Demographic data is required quarterly reporting in the OVC PMT (Performance Measurement Tool) system.

Determination of Suitability Required, in Advance, for Certain Individuals who may 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) during the course of activities under the award 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://justice.ky.gov/Departments-Agencies/GMD/Pages/suitability.aspx> for details of this requirement.

Ineligible Subrecipients. Federal agencies including U. S. Attorney's and FBI Field Offices are not eligible to apply for funding under this program. In-patient facilities such as those designed to provide treatment to individuals with drug, alcohol and/or mental health-related conditions are also not eligible to apply for funding under this program.

ALLOWABLE COSTS

Direct Services

Direct services for which VOCA funds may be used include, but are not limited to, the following categories. See [28 C.F.R. § 94.119](#) for specific information about each service category.

- Immediate emotional, psychological, and physical health and safety
- Personal advocacy and emotional support
- Mental health counseling and care
- Peer support
- Facilitation of participation in criminal justice and other public proceedings arising from the crime
- Legal assistance
- Forensic medical evidence collection examinations
- Forensic interviews
- Transportation
- Public awareness
- Transitional housing
- Relocation

Activities Supporting Direct Services

Supporting activities for which VOCA funds may be used include, but are not limited to, the following. See [28 C.F.R. § 94.120 – Allowable costs for activities supporting direct services](#) for specific information about each activity.

- Coordination of activities
- Supervision of direct service providers
- Multi-system, interagency, multi-disciplinary response to crime victim needs
- Contracts for professional services
- Automated systems and technology
- Volunteer trainings
- Restorative justice

Administrative Costs

Administrative costs for which VOCA funds may be used by subrecipients include, but are not limited to, the following. See [28 C.F.R. § 94.121 – Allowable sub-recipient administrative costs](#) for specific information about each cost.

- Personnel costs
- Skills training for new staff

- Training-related travel
- Organizational expenses
- Equipment and furniture
- Operating costs
- VOCA administrative time
- Maintenance, repair, or replacement of essential items
- Project evaluation

Indirect Costs and De Minimis

Agencies may charge a Federally negotiated indirect cost rate or the de minimis rate to VOCA 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 organization's Modified Total Direct Costs (MTDC). MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, and travel. MTDC excludes equipment, capital expenditures, charges for patient care, tuition remission, scholarships and fellowships, 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. Please see [2 C.F.R. § 200.1](#) for more information on MTDC.

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

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

Certified Facility Dogs

A facility dog is a professionally trained assistance dog, suitable for providing quiet companionship to vulnerable individuals in legal settings without causing any disruption of the proceedings. Facility dogs are working dogs that are specially chosen because of their calm demeanor and ability to work in a high-stress environment thereby decreasing the risk of creating legal issues. A facility dog is handled by a professional who has been individually trained by an

accredited assistance dog organization. The primary handler receives intensive training on how to handle the dog in public and care for the dog for its lifetime at work and home. Handlers include victim advocates, forensic interviewers, detectives, prosecuting attorneys, Guardians Ad Litem, therapists, and other professionals. Subrecipients may propose up to \$2,000 in Operating Expenses. Additionally, subrecipients can propose Travel/Training Expenses for travel to the International Courthouse Dogs Conference for a handler and the associated Certified Facility Dog, provided the dog graduated from an accredited assistance dog organization affiliated with Assistance Dogs International and was placed with the agency prior to the beginning of the grant period. *Note: A “Facility Dog” is not a Therapy Dog or Service Dog. As case law develops and statutes are enacted regarding the use of dogs assisting vulnerable people involved in the legal system, the terms for these dogs have been used interchangeably even though the dogs have different levels of training, work requirements, or are defined specifically in federal legislation. The labels for these dogs need to be used correctly to ensure that the precedents being established are meaningful throughout the United States.*

UNALLOWABLE COSTS AND ACTIVITIES

Notwithstanding any other provision of the guidelines and regulations, VOCA funds may not be used to fund or support (nor can expenditures supporting these activities be applied as match) the following, as prohibited by 28 C.F.R. § 94 and available at:

<https://www.federalregister.gov/documents/2016/07/08/2016-16085/victims-of-crime-act-victim-assistance-program>:

- **Lobbying.** Lobbying or advocacy activities with respect to legislation or to administrative changes to regulations or administrative policy (c.f. 18 U.S.C. 1913), whether conducted directly or indirectly.
- **Research and studies.** Research and studies, except for project evaluation under [28 C.F.R. § 94.121\(j\)](#).
- **Active investigation and prosecution of criminal activities.** The active investigation and prosecution of criminal activity, except for the provision of victim assistance services (e.g., emotional support, advocacy, and legal services) to crime victims, under [28 C.F.R. § 94.119](#), during such investigation and prosecution.
- **Fundraising.** Any activities related to fundraising. The subrecipient may engage in fundraising, as long as such activities are not financed by federal grant funds.
- **Capital expenses.** Capital improvements; property losses and expenses; real estate purchases; mortgage payments; and construction (except as specifically allowed elsewhere in the regulations and guidelines).
- **Compensation for victims of crime.** Reimbursement of crime victims for expenses incurred as a result of a crime, except as otherwise allowed by other provisions in the regulations and guidelines.
- **Medical care.** Medical care, except as otherwise allowed by other provisions in the regulations and guidelines.
- **Salaries and expenses of management.** Salaries, benefits, fees, furniture, equipment, and other expenses of executive directors, board members, and other administrators (except as specifically allowed elsewhere in the guidelines and regulations).

GENERAL FINANCIAL REQUIREMENTS AND INSTRUCTIONS

Grants funded under the VOCA Victims Assistance 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>
- **28 C.F.R. § 94 – VOCA Victim Assistance Program**
<https://www.ecfr.gov/current/title-28/chapter-I/part-94>
- **DOJ Grants Financial Guide (Updated March 2022)**
<https://www.ojp.gov/doj-financial-guide-2022>
- **Kentucky Justice and 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+%20111-43-00%29%20071516.pdf>

Requests for reimbursement shall be submitted on a monthly or quarterly basis for the 2023-24 project period. Beginning with the 2024-25 project period, requests for reimbursements 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 award. 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 Attachment page of their applications. The form can be downloaded at:

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

Subrecipient accounting systems should have the following capabilities:

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

Budget control. The system should compare actual expenditures or outlays with budgeted amounts for each subaward. It also must relate financial information to performance or productivity data, including the development of unit cost information whenever appropriate or specifically required in the award or subaward agreement.

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

Source documentation. The system 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 Funded Services

Funded direct services must be provided at no charge, unless the SAA grants a waiver allowing the subrecipient to generate program income by charging for services. Program income, where allowed, shall be reported and is 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/financialguidedojo/iii-postaward-requirements#2kqnom>.

Proration of Costs

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

Cost Allocation

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

Supplanting

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

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

Funds specifically budgeted and/or received for one project may not be used to support another. Where a subrecipient's accounting system cannot comply with this requirement, the subrecipient

shall establish a system to provide adequate fund accountability for each project it has been awarded.

Potential supplanting will be the subject of the application review, pre-award review, post-award monitoring, and possible audit. If there is potential supplanting, the applicant/subrecipient will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds. Additional guidance for subrecipients on the maintenance of documentation to sufficiently demonstrate non-supplanting can be accessed at See Section 2.3 of the *DOJ Grants Financial Guide*, available at <https://www.ojp.gov/funding/financialguidedoj/ii-preaward-requirements#z0opk7> additional information about supplanting, including guidance on maintaining documentation to sufficiently demonstrate non-supplanting.

Supporting Documentation

Subrecipients shall maintain appropriate financial records that fully disclose and document the amount and disposition of grant funds received. Supporting documentation shall fully support each expenditure incurred by the subrecipient and shall tie directly back to the purposes of the award. Specific examples of supporting documentation to substantiate grant disbursements and subrecipient compliance with the laws, regulations, conditions, and policies governing VOCA awards are identified for each budget category in the Budget section of this document.

APPLICATION INSTRUCTIONS

Applicant Information

Contact Information. The following persons are eligible to serve as designated grant officials:

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

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

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

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

Determination of Suitability to Interact with Participating Minors. Determination of suitability is required, in advance, for certain individuals who may interact with participating minors. Upload completed Determination of Suitability Certification Form, available for download on the application page, to demonstrate compliance with this federal award condition.

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

Audit Requirements. Non-federal entities that expend \$750,000 or more in federal funds (from all sources including pass-through subawards) in the organization fiscal year (12-month reporting period) shall have a single organization audit conducted in accordance with the

provisions of the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

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

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

Application

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

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

Subgrant Information. The information provided by the applicant will be conveyed to OVC in the event the applicant organization receives an award. If awarded, subrecipients will receive follow up request from GMD for additional information needed to complete a Subgrant Award Report (SAR) for OVC. Please ensure that percentages represent the results of analysis of victimization types addressed by the project.

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

- An introduction to the project.
- Essential components of project implementation.
- Support the need for each component of your proposed project with current and appropriate facts, research, and statistical evidence.
- 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

<https://www.ojp.gov/funding/grants101/write-proposal-overview>

Goals and Objectives. Briefly state 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. Goals and Objectives should be SMART – Specific, Measurable, Achievable, Relevant, and Time-bound. Attach to the Goals and Objectives page a Project Timeline, Time/Task Plan, Logic Model, or comparable resource showing how the project will be executed over the period of performance and how the entity plans to capture, measure, and report those results.

Project Details. This section provides an opportunity for applicants to give thoughtful insights into the proposed project activities. Content in this section should clarify how the proposed VOCA funded project complements the applicant agency’s mission. Applicants shall provide substantive responses to each question with specificity regarding the nature of the proposed project and with defined outcomes in mind.

Project Coordination Narrative. Providing assistance to victims of crime effectively requires coordination and cooperation at all levels. The development of the Commonwealth's strategy for assisting victims of crime includes the participation of federal, state, and local criminal justice, prosecutorial, and victim service agencies. The JPSC is charged with increasing coordination among these entities to achieve a comprehensive and effective approach to funding victim assistance programs with VOCA awards. Multi-jurisdictional programs, interagency projects, and collaborative efforts that result in increased coordination and cooperation among criminal justice agencies, prosecutor-based programs, and victim service agencies are a priority of this program. In this section, applicants will describe collaborative efforts to provide victim services with other agencies and individuals within the community. These descriptions should provide concrete examples of how working with community partners will enhance project success, describe in detail how the submitted MOUs will contribute substantively to victim services and how the agencies coordination efforts make a substantial impact within communities, sectors, or organizations to support victim service delivery.

Agency Performance. Applicants will provide a description of funded services provided in the last year, if applicable. Description must include number of clients served, services provided, counties served, and the positive outcome which were achieved through those services. New applicants must provide an overview of victim services provided in the last year. Additionally, applicants will describe agency outreach and services to unserved/underserved populations in the past year, including (but not limited to) outreach to victims, employee and volunteer recruitment, and community awareness activities. Applicants shall explain how the proposed project will enhance agency performance.

Attachments. The following upload fields are available on the Attachments page:

Three (3) Memorandums of Understanding	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
Project Timeline or Time/Task Plan	Required

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

An additional attachment field is available for agencies requesting Operating Expenses and/or Travel/Training funds related to Facility Dog certification. If relevant, applicant shall upload the following items as ONE attachment:

- Contract with the accredited assistance dog organization
- Handler’s Resume (information must match information in the contract)
- Facility Dog Job Description including dog’s prioritization of duties to ensure animal safety and wellbeing
- MOU with veterinarian to provide the necessary annual care

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.
- Budget revisions may be required later based on availability of funds or to remove expenses not allowable under VOCA.
- A budget checklist is provided at the end of this section to assist in completing the VOCA 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 direct services to victims. VOCA funds may be used to support administrative time to complete VOCA required time and attendance sheets, programmatic documentation, reports and statistics; and to maintain crime victims' records.

Each position must be listed by title, total gross salary rate for the position, percentage of the position'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). **TIP: If requesting multiple positions with the same Position Title, please differentiate between them in a consistent way (ie, Victim Advocate 1, Victim Advocate 2, etc).** If awarded, a Staff Tracking Form page will be added to your application during the budget modification phase 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. Those 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 classification systems and shall be documented by appropriate time and activity records.
- A job description must be submitted for each requested position.
- Job descriptions for positions supported by multiple funding sources (allocated at less than 100% to the VOCA project) must include a breakdown of job duties that clearly describes funded duties and non-VOCA duties. The employee's timesheets shall indicate such separation of time worked and support the total time being recorded for the employee, both VOCA funded and non-VOCA funded.
- 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.
- Payments for fringe benefits are allowable personnel costs but cannot exceed the amount paid by the employer. Documentation of fringe benefits must be submitted with the budget to reflect the actual rates being paid by the employer.
- Fringe benefits must be available to all agency staff and include, but are not limited to:
 - a. Health, Dental and Life Insurance (up to the cost of a single plan)
 - b. FICA
 - c. Retirement
 - d. Worker's Compensation
 - e. Unemployment Insurance

Overtime

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

Prosecutor Based Advocates. Pursuant to [KRS 15.760](#) and [KRS 69.350](#), an individual employed as a victim advocate shall be a person who, by a combination of education, professional qualification, training and experience, is qualified to perform the duties of this position. The victim advocate shall be an individual at least eighteen (18) years of age, of good moral character, with at least two (2) years of experience working in the human services field or court system in a position requiring professional contact with adults, who has:

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

Volunteers. OVC requires volunteer usage as an eligibility requirement for VOCA funding. Subrecipients are required to contribute 50 volunteer hours regardless of whether the hours are used as match, unless a written waiver request is submitted to and approved by GMD. Volunteer hours used to fulfill the 50-hour requirement are not required to be VOCA project activities and may be in support of any facet of the agency's operations.

Volunteer hours used for **in-kind match**, however, must be providing VOCA-allowable services directly related to the VOCA 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 minors during the course of activities under the award. See **Determination of Suitability to Interact with Participating Minors** (page 14).

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

In extenuating circumstances, a volunteer match waiver of this requirement may be granted at GMD's discretion. Upon receipt of notice of award, subrecipients may use the Grant Award Modification (GAM) tool to request a volunteer waiver.

Exclusions – Personnel

The following cannot be supported with VOCA funds **or** used as match:

- Clerical volunteer hours, unless approved in original application as essential to the project
- Salary and/or benefits that are greater than the percentage of time spent on the performance of funded project 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
- Fundraising activities
- Lobbying activities
- Bonuses
- Job placement services. Crisis Counseling and/or case management which discusses employment issues or makes referrals to job placement or 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, including those used as match, must:
 - Reflect 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 funded project. For example, a full-time employee working 40 hours per week performs 15 hours of funded project activities and 25 hours of activities not supported by VOCA funds. 37.5% of the employee's salary for the week may be paid with VOCA funds.
 - Be prepared at least monthly and coincide with one or more pay periods
 - Include signatures of the employee and an approving supervisor with firsthand knowledge of the work performed
 - Volunteer timesheets must provide information to document the number of hours and activities performed and must have the same signature requirements as timesheets for funded personnel. Additionally, volunteer timesheets must demonstrate that only hours spent performing VOCA-allowable activities are being applied as match.
- Paystubs, invoices and proof of payment for fringe benefits reflecting 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 VOCA program for work performed during a single period of time even if 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 [DOJ Grants Financial Guide](#) Section 3.8, 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.
- 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.

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 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 the contractor/vendor suspension or debarment from receiving federal funds prior to remitting grant funds

For information on contract assistance, including contract types and verbiage, see *Guide to Procurements Under DOJ Grants and Cooperative Agreements* (revised November 2020) at <https://www.ojp.gov/doj-guide-to-procurement-procedures>.

Travel and Training

Training costs for paid and volunteer staff are allowable costs. Use of VOCA funds for training is limited to skills development of direct services providers, to enhance their skills directly related to providing victim services related to project goals and objectives.

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 are more restrictive than those of the Commonwealth, the MORE RESTRICTIVE rate must be followed.

NOTE: Expenses for a facility dog handler and facility dog to attend the International Courthouse Dogs Annual Conference are allowable travel/training expenses, if the dog and handler follow the GMD requirements specified in the prior **Certified Facility Dogs** section.

- Each request must include the purpose, destination, lodging, mileage rate and per diem.
- VOCA funds may be used for transportation, subsistence, and registration fees for applicants to attend conferences and training seminars.
- Travel must be approved through the original grant application or through a subsequent Grant Award Modification (GAM).
- Registration fees required for admittance to official travel meetings are reimbursable. If the fee entitles registrants to meals, claims for subsistence must be reduced accordingly.
- Requested travel expenses shall not exceed the established mileage and subsistence policy as set forth by the Commonwealth of Kentucky, Finance and Administration Cabinet. For current rates and regulations, see 200 KAR 2:006 and <https://finance.ky.gov/office-of-the-controller/office-of-statewide-accounting-services/Pages/state-employee-travel.aspx>.
- Transportation must be the most economical.
- Bus, subway, and taxi (including, but not limited to Uber, Lyft, etc.) fares are allowed for city travel.
- Commercial airline travel shall be coach/tourist class.
- The cost of rental cars in lieu of ordinary transportation will be allowed only with acceptable justification.
- Actual parking, bridge and toll charges are reimbursable.
- Reasonable expenses for baggage handling, for delivery to or from a common carrier or lodging and for storage are reimbursable.

Exclusions – Travel and Training

The following cannot be funded or used as match:

- Training to enhance administrative or management skills
- Additional expense for first class travel
- Telephone, tips, or laundry charges incurred at a lodging establishment
- “Gas cards” or comparable cards whose usage or expenditures cannot be tracked
- Travel and training costs related to a facility dog that is not a graduate of an accredited assistance dog organization

Supporting Documentation – Travel and Training

Subrecipients are required to maintain supporting documentation for all Travel and Training expenses. Examples of supporting documentation for Travel and Training expenses 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

Operating Expenses

Operating expenses include items essential for the ongoing operation of the project. Allowable operating costs include but are not limited to:

- Emergency Victim Assistance costs, including but not limited to food, clothing, rental assistance, security deposits, utilities, and other costs incidental to a client’s victimization
- Advertisement to recruit for funded positions
- Equipment usage fees supported by usage logs
- Books, training manuals and videos for direct service providers
- Costs of performing background checks and other employment screening requirements, including costs of determination of suitability to interact with participating minors
- Utilities and security for the space used by the program whether owned, rented, or donated
- Rental of office space or project performance site
- Printing and distribution of brochures and similar announcements describing the direct services available and how they may be obtained. All printed materials supported by grants funds must contain an acknowledgment of support using the following or comparable footnote: “This project was supported by Grant Number (insert current grant number) awarded through the Kentucky Justice and Public Safety Cabinet by the U.S. Department of Justice. The opinions, findings, conclusions, and recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the Kentucky Justice and Public Safety Cabinet or the U.S. Department of Justice.”
- Costs related to a certified Facility Dog:
 - Annual veterinarian costs
 - Food, treats, and toys for the health and care of the working animal
 - Materials used while working with the Facility Dog, including, but not limited to, trading business cards or Facility Dog coloring books
 - **A maximum amount of \$2,000 in operating expenses related to a Certified Facility Dog can be requested under this application.**
- 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
- Audit costs are allowable, but must be allocated according to the percentage of the total agency budget that VOCA funding represents
- Federally negotiated indirect cost rate OR de minimis rate

Instructions

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 VOCA 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 C.F.R. § 200.403\(d\)](#).
- 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.
- Tax preparation fees
- Accounting services
- Technology costs that comprise an *Information technology system* (as defined in [2 CFR 200.1](#)) with a total cost greater than \$5,000 (must be classified as **Equipment**).
- Household items not specifically identifiable to the immediate crisis period
- Equipment repair and maintenance for any item not purchased with VOCA funds, excluding allocated copy contracts that include toner, supplies, etc.
- Janitorial, cleaning, and/or lawn care supplies.
- In-kind rent when not supported by a recent, written fair market rental value estimate from a real estate professional or landlord
- “Gas cards” or comparable cards whose usage and expenditures cannot be tracked
- Law enforcement equipment unrelated to victim services, such as uniforms, safety vests, shields, weapons, bullets, and armory
- Other costs such as liability insurance on buildings, capital improvements, property losses and expenses, mortgage payments, real estate purchases, construction
- Procurement/purchase of a Facility Dog

- Operating Expenses for a Facility Dog that is not a graduate from an accredited assistance dog organization

Supporting Documentation – Operating Expenses

Subrecipients shall maintain supporting documentation for all Operating Expenses. Documentation shall be completed and directly related to the objective of the award. If an invoice is cost allocated, the documentation shall demonstrate the percentage of cost applied by the payor source. (Gas bill: 50% VOCA, 25% VAWA, 25% Agency) Examples of supporting documentation for Operating Expenses 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. If the applicant's capitalization limit is below \$5,000, then the lower limit applies. 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 must be appropriately prorated to each program/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.

Exclusions – Equipment

The following cannot be funded or used as match:

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

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. 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>.

Budget Narrative

Applicants shall submit a detailed budget narrative. The narrative shall 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 shall 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.

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.

Funding will be prioritized for costs that support the provision of direct services to victims of crime. Targeted percentage reductions may be applied to reach the limit of available funds approved to be awarded under this solicitation.

The Commonwealth will fulfill the priority allocation requirements as specified in [28 C.F.R. § 94.104\(b\)](#) and previously detailed in the **Allocation of Subawards** section of this document. In determining the funding needs of programs serving priority victims, the Commonwealth considers other funding options that may be available or in place for priority program areas, as well as the needs and availability of services in the state for other categories of crime victims.

Award Notification and Acceptance

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

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

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

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.

Reporting Requirements

Subgrant Award Reports (SAR). Subrecipients are required to submit a Subgrant Award Report (SAR) for each project during which it receives VOCA funds, within 90 days of the beginning of the performance period. The SAR identifies how the awarded funds will be used. GMD will provide each subrecipient with access to the Office for Victims of Crime (OVC) Performance Measurement Tool (PMT) platform for this purpose.

Progress, Financial, and PMT Reporting. Subrecipients agree to submit financial and program reports according to the specified deadlines. Subrecipients must collect and maintain data that measures the performance and effectiveness of work under this award. Data must be provided to OJP and 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 Period	Report Submission Deadline
Quarter 1: October 1 – December 31	January 15
Quarter 2: January 1 – March 31	April 15
Quarter 3: April 1 – June 30	July 15
Quarter 4: July 1 – September 30	October 15

Performance Reporting

OVC Performance Measurement Tool (PMT). Subrecipients are required to track population demographic and direct service information on clients served and direct services provided with VOCA and matching funds. Subrecipients report this information quarterly on the OVC PMT submitted in the OJP Performance Measurement Platform. The PMT is due 15 days after the close of each quarter.

Progress Report. Subrecipients report training and volunteer activities on the quarterly Progress Report submitted in *IGX*. The Progress Report contains additional narrative questions. The Progress Report is due 15 days after the close of each quarter.

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 schedule set forth may result in delays or withholding of funds. Financial reports shall be submitted on a monthly or quarterly basis during the grant period. **Beginning with the 2024-25 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 line item (instead of simply providing an aggregate for each budget category). Itemized expenditures 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 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 quarterly 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](#). 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 VOCA award must be submitted by **July 31st** of the grant year unless otherwise approved by GMD. Exceptions to the July 31st deadline for GAM request submissions are those to update an award's Contact Information page or to reflect funded staff resignations, terminations, or hires conducted in accordance with the hiring requirements established in the award conditions.

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

GAM Process

The GAM process employed by GMD begins through written correspondence between the

subrecipient and assigned grant administrators. The subrecipient must submit a detailed budget spreadsheets 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 VOCA 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.”

VOCA Program and Financial Administrators will complete risk assessments in *IGX* for each individual subaward, and the GMD VOCA monitoring schedule will be revised based on the overall subrecipient risk.

Training

All funded staff, including those applied as match, are required to complete 12 hours of training annually specific to victim assistance regardless of hire date. 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. Training hours should be reported on the quarterly Progress Report submitted in *IGX*. The OVC Training and Technical Assistance Center (OVC-TTAC) offers a wide assortment of free online training at:

<https://www.ovcttac.gov/views/resources/index.cfm?nm=wbt>.

Closeout

Subrecipients are required to submit a Year-end Financial Report in *IGX* within 15 days of the close of the award period.

Budget Checklist

This checklist is for applicant use only and should not be submitted with the application.

Personnel

Salaries

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

Benefits

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

Contractual Services

- Is each service described?
- For individual consultants, has an hourly or daily rate been conveyed in the narrative?
- Is the compensation rate for individual consultants within the maximum allowable compensation rate?
- Are base rates justified and reasonable?
- Does the total value of any contractual service exceed the procurement threshold of the 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 follow a sole source procurement procedure, 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.)?
- 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 \$5,000 or the procurement threshold of the 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 follow a sole source procurement procedure, 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 (20%) 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?