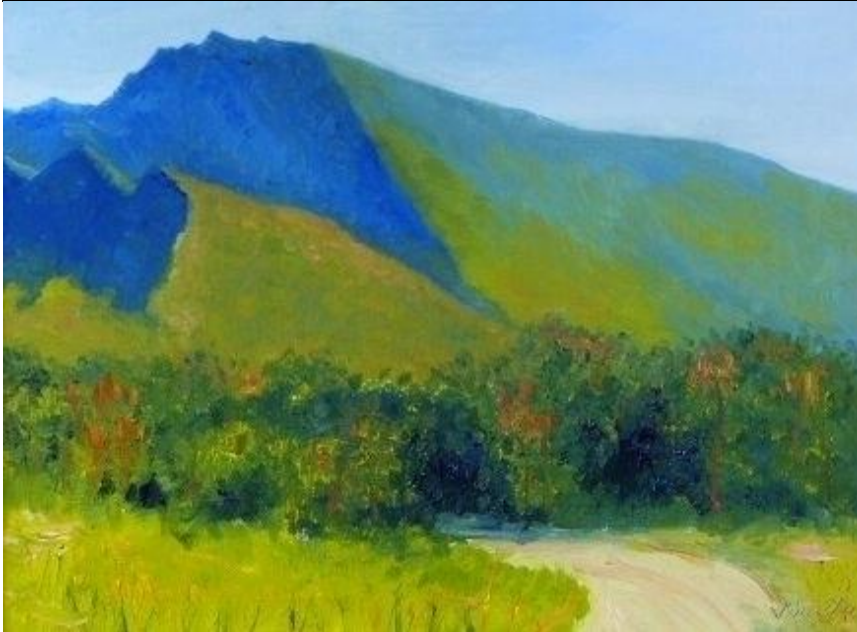


Vermont Center for Crime Victim Services Grants Plan Guidelines



EFFECTIVE JULY 1, 2017

VERSION 4



VERMONT CENTER FOR CRIME VICTIM SERVICES

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GRANT PROGRAM DESCRIPTION

The Vermont Center for Crime Victim Services (VCCVS or the Center) administers federal and state grant programs that are closely allied with its vision of joining with victims, survivors, and those who interact with victims and offenders to provide, sustain, and support a collaborative system of direct services across Vermont that is comprehensive, victim-centered, trauma-informed and accessible to all diverse populations, and geographic regions in the state. For Vermont legislation specifically related to the Center please see [13 V.S.A. §5361](#).

PRE AWARD ELIGIBILITY DETERMINATION

The Vermont Center for Crime Victim Services will determine the eligibility for all subgrantee grant awards, regardless of category, amount, or funding source prior to issuing awards.

SUSPENSION OR DEBARMENT

A subgrantee will be considered ineligible if any of the three following conditions exist:

1. Suspension and Debarment- Organizations that have been suspended or debarred by the Federal government. To ensure that applicants have not been suspended or debarred the VCCVS financial/grant staff will check the [State of Vermont's Buildings and General Services, Office of Purchasing and Contracting Debarment List](#) and [the United States Department of Labor, Office of Federal Contract Compliance Programs \(OFCCP\) list of debarred companies](#).
2. Subrecipient Annual Report:-Organizations that are currently delinquent in submission of the Subrecipient Annual Report to F & M for any of the preceding three years are ineligible to receive new awards until the delinquent status has been resolved. The VCCVS financial/Grant staff will run a VISION query is monitor the status of subrecipient Annual reports.
3. Single Audit Report-Organizations that are currently delinquent in the submission of a Single Audit report for any of the preceding three years, until the delinquent status has been resolved. The VCCVS financial/grant staff will run a VISION query is monitor the status of single audits.

RISK ASSESSMENT

A risk assessment will be completed for each subgrantee, by the VCCVS financial/grants staff based on the total grant awards. The current list of grant awards and totals will be attached to the risk assessment and kept in an electronic file per subgrantee per fiscal year. If a subgrantee is considered to be high-risk, and it is in the best interest to grant the award to the subgrantee, a written justification must be included in the official grant file and must be approved by the Appointing Authority. The award must be issued on a reimbursement only basis and additional monitoring requirements may include frequent programmatic review, additional review of quarterly financial reports, sites visits, etc. When a grant award includes special conditions or additional requirements, these must be clearly specified in the grant award document.

Items to consider when assessing risk may include the following:

1. Compliance with terms and conditions of prior grant awards
2. Total amount and/or complexity of the award
3. Financial stability of the organization
4. Recent incidences of fraud, embezzlement, or mismanagement
5. The results of prior audits, including Single Audits, when applicable
6. Prior experience with similar awards
7. Current staffing levels and qualifications

It is the Center's policy that subgrantees do not have family members of agency staff serving on the board of directors. Nor should the agency employ other family members of agency staff. Funding from the Center is contingent upon compliance with this policy.

A copy of the current VCCVS risk assessment form was provided for reference upon submission of this grant plan.

ISSUANCE PROCEDURES

GRANTEE SELECTION PROCESS

The Vermont Center for Crime Victim Services (VCCVS) administers numerous state and federal grant programs which may be competitive or non-competitive in nature. The grantee selection process is driven by the federal or state statutes that govern these funding sources. Public and non-profit entities, including local units of government, tribal governments and community based organizations may be eligible to apply for these funds.

All subgrantees are required to submit the following materials with their application;

- An application cover sheet detailing subgrantee information, contact names, addresses, phone numbers, DUNS numbers, and Vendor Number this to ensure that information is updated yearly, and that Standard Grant Agreements contain accurate information.
- A budget summary including a detailed budget narrative of the intended use of the funds
- Signed civil rights assurances
- Insurance Certificates
- Organizational Budgets
- Organizational Conflict of interest policy (if a non-profit)
- Most recent audit and/or review

GRANT APPROVAL PROCESS

For non-competitive state grant programs or federal formula grants, whose purposes have been mandated by the Vermont legislature or the United States Congress, some sub recipient awards are determined using fully researched formulaic percentages that are related to square miles in the service area; the number of towns in the service area; the number of counties in the service area; population of the service area (using census data) and services provided.

For competitive grant solicitations, the Vermont Center for Crime Victim Services will issue Request for Proposals (RFPs). The RFPs will provide guidance to applicants, outline the criteria and process from which the proposals will be evaluated and the contractual terms that will govern the relationship between the State of Vermont and the award recipients.

Once a completed application package is submitted from the subgrantee the risk assessment will be completed to determine if the subgrantee is high risk or not the budgets will be reviewed for accuracy and that expenditures are within the guidelines of the state and federal requirements. The application is review by the VCCVS finance/grants staff for approval. Once approved the Standard Grant Agreement will be issued and signed by the Executive Director and sent to the subgrantee via email.

A copy of the current VCCVS Standard Grant agreement was provided for reference upon submission of this grant plan.

AMENDMENTS

No changes, modification, or amendments in terms and condition of Grant Agreements shall be effective unless reduced to writing, numbered and signed by the duly authorized representative of the State and Subrecipient.

Amendments are required to a grant when:

1. There is *any significant* change in program objectives; or
2. There is *any* increase or decrease in the total amount of the grant

Amendments are required to a grant's budget only when:

1. An increase in a line item of the grant budget exceeds 10% of the line, and there is not a change in the amount of the overall grant.

After an amendment is deemed necessary the following approval process takes place;

For amended grants and budgets:

1. VCCVS finance/grants staff will review for approval the revised budget and budget narrative as submitted by the subgrantee.

For amended grants:

1. An amended grant agreement documenting Part I identifying that the original award has been amended will be issued and sent to the subgrantee.
2. The amended grant will be entered into the Grants Tracking Module of VISION for tracking.

SUBRECIPIENT/CONTRACTOR DETERMINATION

VCCVS will use the [Association of Government Accountants \(AGA\) recipient checklist](#) to determine if the entity receiving funds has a contractor or subrecipient relationship. The AGA checklist is used to help a recipient of federal funds make a judgment as to whether each agreement it makes, for the disbursement of federal programs funds, cast the entity receiving the funds in the role of subrecipient or contractor. The checklist is intended for use by all non-federal entities based on 2 CFR Chapter I, Chapter II, part 200 et al. Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, Uniform Guidance, issued by the U. S. Office of Management and Budget (OMB) on December 26, 2013, and effective for non-federal entities on December 26, 2014.

The VCCVS finance/grants staff will use the AGA checklist to make a determination relating to whether relationship is that of a Subrecipient or Contractor.

DISBURSEMENT OF GRANT FUNDS

Financial Status Reports are required from all subgrantees for all grants at least quarterly depending on the grant program. Financial Reports should be submitted to financial.reports@ccvs.vermont.gov. The financial reports and instructions can be found on the CCVS webpage <http://www.ccvs.vermont.gov/> in the Resource Directory. The financial reports are due 15 days after the end of each quarter. Any state funds not spent by June 30th shall revert back to the Center.

Grant payments are made through the VISION Accounts Payable module subject to procedures established by F&M. The invoice number on the VISION voucher must contain the grant award number which must match the grant number as entered in the Grants Tracking module. The financial status report from the grantee will be retained in the granting agency's files in accordance VISION Procedure No. 2-VISION Records Retention Procedure. Payments may only be made to the official grantee for the award. Therefore, if a grant agreement is made to an organization utilizing a fiscal agent, payment may only be made to the party designated as the official grantee.

If the grant award is a Federal sub award, the Federal share of the payment must also use a Class Code of **00001** to identify it as a sub recipient payment. When an award is funded with a combination of state and federal funds, The Class Code is only required to be used for the Federal share of the payment, though it is permissible to use it for all payment rows. If a federal grant has been identified as a contractual relationship, do not use the Class Code.

State Grant Disbursements

State grant programs are awarded to subgrantees on the state fiscal year July 1- June 30th. Once a signed Standard Grant Agreement and all required documentation is filed with VCCVS, the subgrantees may request an advance of funds up to 50% of their total grant to meet immediate cash requirements after July 1st in accordance with [State of Vermont Bulletin No. 5 Policy for Grant Issuance and Monitoring as of December 26, 2014](#). Quarterly financial status reports will

be filed detailing the amounts spent and funds left on-hand. Subgrantees may request up to 25% of the total grant award or the actual expenditures each quarter. The VCCVS financial/grants staff will review and check expenditures against the approved budget.

Federal Grant Disbursements

Federal FVPSA

FVPSA awards to subgrantees follow the fiscal year July 1- June 30th. Once a signed Standard Grant Agreement and all required documentation is filed with VCCVS, the subgrantee may request an advance of funds up to 25% of their total grant to meet an immediate cash requirement after July 1, in accordance with [Part 75 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards Title 45: Public Welfare](#) Quarterly financial status reports will be filed detailing the amounts spent and funds left on-hand. Subgrantees may request up to 25% of the total grant award or the actual expenditures each quarter. The VCCVS financial/grants staff will review and check expenditures against the approved budget.

Federal grant awards to subgrantees typically follow the fiscal year July 1-June 30th. Once a signed Standard Grant Agreement and all required documentation is filed with VCCVS, subgrantees are required to file quarter financial reports. Federal grants are disbursed on a reimbursement only method. Federal grants are administered in accordance with [Title 2: Grants and Agreements Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#). Subgrantees will only be reimbursed for actual expenditures reported each quarter. The VCCVS financial/grants staff will review and check expenditures against the approved budget.

Federal grant programs are awarded and disbursed pursuant to federal regulations and guidelines. In the event the Center enters into a grant agreement (contract) for services rendered, using any federal funds, the Center will first check the excluded parties list located at <https://www.sam.gov/portal/public/SAM/> to verify if a vendor or contractor has been suspended or barred. The Center will not enter into a grant agreement (contract) with anyone appearing on that list.

A copy of the current VCCVS Subgrantee Financial Report and request for advance for funds form was provided for reference upon submission of this grant plan.

MONITORING PROCEDURES/ACTIVITIES

PERFORMANCE MANAGEMENT

All grants, whenever practicable, regardless of funding source, should include performance goals, measures and monitoring. All performance related requirements, including reporting

requirements, must be specified in the written grant agreement. If payment is linked to performance measures, this must be specified in the Payment Provisions.

Programmatic Reports and statistically data are required from all subgrantees for all grants at least yearly or biennially depending on the grant program. These will be submitted to the Grants manager with the due dates indicated on the award documents.

SITE VISIT POLICY

VCCVS will schedule routine programmatic and financial site visits to subgrantees receiving state and/or federal funds every 3 years to ensure compliance Federal and/or State special conditions and/or requirements of both financial and programmatic policies. The purpose of the site visit is to perform routine grant financial monitoring, learn more about program facilities and program activities, and provide technical assistance. Our goal is a monitoring process that embraces open communications, mutual respect, problem-solving and diversity in order to ultimately support strong effective programs, in addition to compliance with federal and state requirements.

- Pre-Site Visit letter will be sent to the subgrantee to schedule a site visit, the letter will include a list of the grants to be reviewed, what the visit will include, who should be present for the site visit, etc.
- Pre-Site Visit Checklist will be sent to the subgrantee, the checklist outlines materials and/or documents that should be submitted either electronically or by mail to VCCVS two weeks prior to the site visit date. The Pre-Site Visit checklist also includes documentation/materials that should be available to VCCVS staff during the site visit.
- The VCCVS Site Visit Checklist will be sent to the subgrantee. The VCCVS Site Visit Checklist should be completed by the Executive Director, Board Chair and staff members as necessary in order to complete the checklist. Once completed the Executive Director and Board Chair are required to acknowledge and sign the checklist and return to VCCVS at least two weeks prior to the site visit date by either a PDF format or by mail.
- During the site visit the VCCVS staff will review the VCCVS Site Visit Checklist that was completed by the subgrantee and verify programmatic, financial and grant requirements.
- A Post-Site Visit Letter will be sent to the subgrantee upon completion of a site visit either indicating that no issues were identified during the site visit and no further action is required by the subgrantee or if a site visit indicates that issues were identified during the site visit the subgrantee must respond with a plan to resolve the identified issues.
- Issues of Resolution: Issues identified by the Grantor (VCCVS) need to be resolved by the subgrantee and require both acknowledgement and resolution action in writing by the subgrantee.
- VCCVS will keep on file the Pre-Site Visit Letter, VCCVS Site Visit checklist, Post Site Visit letter, Issues of Resolution and all materials provided by the subgrantee.

A site visit may also be scheduled with any subgrantee for any of the following reasons:

- Significant staff turnover
- If we receive complaints
- Reports are inadequate or consistently late
- Relevant Audit Findings or non-compliance with audit policy

The Purpose of all site visits is as follows:

- Meet with Director, Board Members and staff to talk about the program's services.
- Meet with Board members about their role and the role of the board with the program.
- Review budget and accounting procedures, including match requirements and staff time sheets when applicable.
- Review Programmatic policies and procedures
- Answer any questions about the VCCVS and the grant programs etc.

Pursuant to § 94.106 Monitoring Requirements of the 7/2016 VOCA (Victims of Crime Act) Rules and Regulations VCCVS shall conduct regular desk monitoring of all VOCA sub-recipients. In addition, VCCVS shall conduct on-site monitoring of all subrecipients at least once every two years during the award period, unless a different frequency based on risk assessment is set out in the monitoring plan.

State Agencies receiving grant funds from VCCVS shall be monitored through the state audit process.

A copy of the current VCCVS site visit letter and checklists were provided for reference upon submission of this grant plan.

DESK REVIEW

VCCVS requires all subgrantees to complete a quarterly financial report for each grant award. The financial report includes the actual amount of grant funds received and grant funds expended during that quarter and Year to Date (YTD) information. VCCVS financial manager reviews the expenditures reported to the actual approved budget for each category per grant. VCCVS may at any time request from the subgrantee back up documentation to verify expenditures reported during any quarter or YTD.

SANCTIONS

When VCCVS determines that a subgrantee is out of compliance with State or Federal law, rule or regulation; is out of compliance with the terms and conditions of the grant agreement, performance requirements or auditing requirements; is suspected of fraud or misuse of funds; or fails to take corrective actions on audit findings, etc. The following sanctions may be implemented:

- Delaying payments or issuing partial payments
- Making payments on a reimbursement basis only

- Placing additional reporting requirements on the award
- Disallowing costs and/or offsetting or requesting repayment if funds have been advanced
- Conducting or arranging for an independent audit and/or site visit
- Cancellation of the award
- Classifying the subgrantee as “high-risk” and withholding future funds

VCCVS may consult with the Commissioner of Finance and management before imposing more severe sanctions and must consult with the commissioner before imposing sanctions for awards that are identified in statute or otherwise directed by the General Assembly or pass through entitlement grants.

AUDIT POLICY

VCCVS will verify that every sub recipient with Federal award expenditures meet the single audit thresholds of OMB Circular A-133 (for fiscal years beginning before December 26, 2014 or Uniform Guidance Subpart F (for fiscal years beginning on December 26, 2014 or after is audited accordingly).

The VCCVS financial/grants staff will review the audit, if accepted the information about the single audit will be entered into the Grants Tracking module in VISION

Information includes, but is not limited to:

1. When the audit was received by the primary pass-through entity
2. When the audit was reviewed by the primary pass-through entity
3. Whether or not there were any findings
4. Whether or not a Corrective Action Plan was requested and received
5. When the audit was accepted (finalized) by the primary pass-through entity
6. If/when a management decision letter was sent
7. Adding comments pertaining to the audit review

In addition to the federal audit requirements: the VCCVS requires all subgrantees, with an annual program budget of \$50,000 or more, to have an audit at least once every three years. In addition, an annual review is required for the intervening years. Copies must be sent to the Center no later than 9 months after the end of the subgrantees fiscal year.

STATE AND/OR FEDERAL REPORTING

FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA)

In accordance with Finance and Management Policy No. 8, and in addition to the requirements specified from the Uniform Guidance, pass-through entities are responsible for complying with all requirements of the Federal Funding Accountability and Transparency Act (FFATA).

Requirements include granting to organizations with a valid DUNS number, and reporting sub awards of \$25,000.00 or greater in the FFATA sub award reporting System. (FSRS).

VISION GRANT TRACKING MODULE

After a grant agreement has been fully executed, the granting agency should deliver a copy of the entire agreement, as executed, to the grantee. All grants must be entered in the VISION Grant Tracking module within 10 days after grant execution. Entry in VISION should be in accordance with procedures and requirements as set forth by F&M.

GRANT CLOSE OUT PROCESS

The final financial status report for SFY quarter ending June 30th is due by July 15th.

State Funds not spent by June 30th revert to VCCVS. The VCCVS financial/grants staff will review and check expenditures against the approved budget.

Federal Grant closeout procedures via GMS closeout section with 5 closeout components that need to be completed as follows:

1. Final progress report
2. Final Federal Financial Report (FFR)
3. Special Conditions
4. Financial Reconciliation
5. Programmatic Requirements Certifications

You have exactly 90 days from when the grant ends to complete the closeout process. On day 91, GMS will automatically generate and administrative closeout and any remaining funds will be frozen.

OFFICIAL GRANT FILE

VCCVS will maintain an up-to-date grant file with award-related documents on file as public record in accordance with the records retention policy established by the Vermont State Archives and Records Administration, GRS-1000.1110: Grants Management Records. If the records pertain to a Federal sub award, and Federal regulations require a longer retention period, the Federal regulations will supersede GRS-1000.1110. Grant files may be kept electronically.

Grant files are saved in the following format. Grant Name, Grant FY, Subgrantee name, Application file, Award file, and Financial file, in addition there is a risk assessment file, audit file, insurance file and site visit file.

The following are to be included in the official electronic and/or paper grant file:

1. The signed original grant agreement, all amendments to the original agreement, and copies of all written correspondence pertaining to the award, written correspondence includes electronic communication such as e-mail. Grant application, including staff analysis of application when

award is competitive in nature. The paper file includes a copy of the signed Standard Grant Agreement Part I and if applicable Part II.

2. Pre-Award Risk Assessment form is filed electronically in Risk Assessment folder by Fiscal Year.
3. Suspension and Debarment certification/documentation, if it is separate from the grant agreement itself will be filed electronically each application per subgrantee.
4. Civil Rights Assurances signed by the subgrantee will be filed electronically per each sub grant.
5. Insurance certificates and/or approved Request to Modify Insurance Requirements form. We be filled in an electronic file Insurance Binders per Subgrantee and also entered into Access with expiration dates.
6. Programmatic, and performance reports required to be filed by the grantee will be kept in an electronic file. Programmatic Grant modification forms will be filed in the electronic file.
7. All financial reports will be kept in both an electronic file and paper file, the paper file will include the VISION payment form, voucher #, approved budget and if applicable any grant modification form(s).
8. Documentation of monitoring activities performed by the granting agency, including audit reports and documentation of single audit review, when applicable will be filed in the electronic audit file per subgrantee as well as in the ACCESS database with date of last audit. Single audit reviews will also be entered in VISION.
9. Subgrantee request for an advance of funds are kept in both the electronic and paper file, and the VISION payment form with voucher number will be attached in the paper file.
10. Any other information relevant to issuance and monitoring activities will be kept in the electronic file.
11. Site Visits documentation will be kept in an electronic Site Visit file by fiscal year as well as there may be some paper files that include documentation that was received during the site visit. The site visit folder will include the initial letter to the subgrantee, the documents that VCCVS received from the subgrantee, the checklist completed and signed by the subgrantee and the post site visit letter from VCCVS to the subgrantee, along with any correspondence in response to the final letter.

**Note: If the granting agency executes multiple grant agreements with the same grantee, documentation of monitoring activities may be filed in a comprehensive vendor file rather than in each individual grant file, but reference to the vendor file must be included in each grant file. Invoices and payment documentation must be filed in accordance with VISION Procedure No. 2-VISION Records Retention Procedure and is not required to be included in the Grant File.*

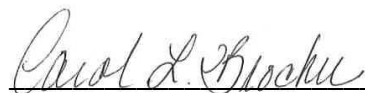
SIGNATURE OF PLAN



Chris Fenno

Date

6/12/2017



Carol L. Brochu, Financial Manager & Grant Plan Contact

6/12/2017

Date





Date

Andrew Pallito, Commissioner of the VT Department of Finance & Management