

VICTIMS OF CRIME ACT (VOCA)

VICTIM ASSISTANCE FORMULA GRANT

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PROGRAM & FINANCIAL GUIDELINES AND INSTRUCTIONS

Kentucky Justice & Public Safety Cabinet Grants Management Branch

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KENTUCKY JUSTICE & PUBLIC SAFETY CABINET GRANTS MANAGEMENT BRANCH VOCA VICTIM ASSISTANCE FORMULA GRANT

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INTRODUCTION

These Program & Financial Guidelines and Instructions are prepared by the Kentucky Justice & Public Safety Cabinet, Grants Management Branch (GMB) and 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. The purpose of this document is to establish program and financial policy and administrative guidance for the management of the Victims of Crime Act (VOCA) Victim Assistance Formula Grant. This document also describes the VOCA application and grant management procedures, requirements and instructions.

Funds granted to Kentucky by USDOJ are subgranted by the Justice and Public Safety Cabinet to state agencies, units of local government, and private nonprofit organizations. Funds are awarded to applicants through a competitive process to carry out programs and projects contained in an approved application that complies with the priorities established by USDOJ and the Commonwealth. Funds under this program shall be used to support eligible crime victim assistance programs that provide direct services to crime victims.

Purpose. The VOCA Victim Assistance Formula Grant Program has as a primary objective to provide hands-on assistance directly to victims of crime, by assisting local units of government and private nonprofit organizations in enhancing or expanding direct services to victims of crime, in encouraging the states to improve their assistance to crime victims, and in promoting the development of comprehensive services to all victims of crime.

AWARD PERIOD

The standard award period is one year from October 1 through September 30.

PROGRAM MATCH

Program Match is required for this grant opportunity. Matching contributions of 20% (50% for new applicants), cash or in-kind, of the total cost of each VOCA project (VOCA grant plus match) are required for each VOCA-funded project and must be derived from nonfederal sources, except as provided in the <u>USDOJ OJP Financial</u> <u>Guide</u> (Part III. Post Award Requirements; Chapter 3.3 Matching or Cost Sharing Requirements). All funds designated as match are restricted to the same uses as the VOCA victim assistance funds and must be expended within the grant period. Match must be provided on a project-by-project basis. For more information see the section entitled *General Financial Guidelines*.

Applicants are encouraged to not overmatch. Applicants should be mindful that any funds designated as matching funds for VOCA dollars are restricted to the uses outlined in the application. Additional match above and beyond the required percentage will become a required element of the project and may result in a reduction in federal funding if not met.

ELIGIBILITY AND REQUIREMENTS

VOCA establishes eligibility criteria that must be met by organizations requesting VOCA funds. These funds are to be awarded to subrecipients solely for the purpose of providing direct services to victims of crime. Each subrecipient organization shall meet the following requirements:

- **1.** Public or Nonprofit Organization. To be eligible to receive VOCA funds, programs must be public or nonprofit organizations, or a combination of such organizations, and provide direct services to crime victims.
- 2. Record of Effective Services. Applicants must demonstrate a record of providing effective services to crime victims. This includes having the support and approval of its services by the community, a history of providing direct services in a cost-effective manner, and financial support from other sources. An existing program shall be considered to have financial support from other sources if at least twenty percent (20%) of its support (including in-kind) is from sources other than the state's crime victim assistance grant.

- **3.** Non-VOCA Program Support. New programs that have not yet demonstrated a record of providing services may be eligible to receive VOCA funding if they can demonstrate that fifty percent (50%) of their financial support comes from non-federal sources. It is important that organizations have a variety of funding sources besides federal funding in order to ensure their financial stability.
- 4. Volunteers. Subrecipient organizations must use volunteers unless the Grants Management Branch (GMB) determines there is a compelling reason to waive this requirement. A "compelling reason" may be a statutory or contractual provision concerning liability or confidentiality of counselor/victim information, which bars using volunteers for certain positions, or the inability to recruit and maintain volunteers after a sustained and aggressive effort. Programs are required to maintain and document a minimum of two hundred (200) volunteer hours during the grant award period. Volunteer time must include direct services to victims of crime.
- **5.** VOCA-funded Staff Training Requirement. Project staff funded in whole or in part by the VOCA Victim Assistance Grant must complete twelve (12) hours of victim assistance-related training during the grant award period.
- 6. Promote Community Efforts to Aid Crime Victims. Subrecipients must promote coordinated public and private efforts within the community to aid crime victims. Coordination may include, but is not limited to, serving on state, federal, or local task forces, commissions, working groups, coalitions, and/or multi-disciplinary teams. Coordination efforts also include developing written agreements that contribute to better and more comprehensive services to crime victims. Coordination efforts qualify an organization to receive VOCA victim assistance funds, but *are not* activities that can be supported with VOCA funds.
- **7.** Help Victims Apply for Compensation Benefits. Subrecipients are required to assist victims in applying for compensation benefits. 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.
- 8. Comply with Federal Rules Regulating Grants. Subrecipients must comply with the applicable provisions of VOCA, <u>http://ojp.gov/ovc/grants/index.html</u> and the requirements of the <u>USDOJ OJP Financial Guide</u> effective edition, which includes maintaining appropriate programmatic and financial records that fully disclose and document the amount and disposition of VOCA funds received. This includes: financial documentation for disbursements; daily time and attendance records specifying time devoted to allowable VOCA victim services; client files; the portion of the project supplied by other sources of revenue; job descriptions; contracts for services; and other records which facilitate an effective audit.
- **9.** Maintain Civil Rights Information. Subrecipients must maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age, and disability within the timetable established by the Grants Management Branch, 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.
- **10.** Non-Discrimination. Discrimination because of race, religion, color, national origin, sex, sexual orientation, gender identity, age or disability is prohibited.
- **11. Comply with State Criteria**. Subrecipients must abide by any additional eligibility or service criteria as established by the Kentucky Justice and Public Safety Cabinet Grants Management Branch (GMB) and included in these guidelines, including submitting statistical and programmatic information on the use and impact of VOCA funds, as requested.
- **12.** Services to Victims of Federal Crimes. Subrecipients must provide services to victims of federal crimes on the same basis as victims of state/local crimes.

13. No Charge to Victims for VOCA-Funded Services. Subrecipients must provide services to crime victims, at no charge, through the VOCA-funded project. Any deviation from this provision requires prior approval by GMB.

Note: prior to authorizing subrecipients to generate income, OVC has strongly encouraged GMB and other state administrators to carefully weigh the following considerations regarding federal funds generating income for subrecipient organizations.

- a. The purpose of the VOCA victim assistance grant program is to provide services to all crime victims regardless of their ability to pay for services rendered or availability of insurance or other third-party payment resources. Crime victims suffer tremendous emotional, physical, and financial losses. It was never the intent of VOCA to exacerbate the impact of the crime by asking the victim to pay for services.
- b. Program income can be problematic because of the required tracking systems needed to monitor VOCA-funded income and ensure that it is used only to make additional services available to crime victims. For example: VOCA often funds only a portion of a counselor's time. Accounting for VOCA program income generated by this counselor is complicated, involving careful record keeping by the counselor, the subrecipient program, and the state.
- **14. Client-Counselor Confidentiality**. Subrecipients must maintain confidentiality of client-counselor information, as required by state and federal law.
- **15. Confidentiality of Statistical and Research Information**. Except as otherwise provided by federal law, no recipient of funds under VOCA shall use or reveal any statistical information furnished under this program by any person and identifiable to any specific person for any purpose other than the purpose for which such information was obtained, in accordance with VOCA. Such information, and any copy of such information, shall be immune from legal process and shall not, without the consent of the person furnishing such information, be admitted as evidence or used for any purpose in any action, suit, or other judicial, legislative, or administrative proceeding. See Section 1407(d) of VOCA codified at 42 U.S.C. 10604.

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

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

ALLOWABLE COSTS

Allowable activities/costs include:

Crisis Intervention Services. Services that meet the urgent short-term emotional or physical needs of crime victims. Crisis intervention services are encouraged to coordinate the provision of a 24 hour service which may include the operation of a crisis hotline that provides emergency counseling or referral for crime victims.

Emergency Services. Services that provide temporary shelter for crime victims who cannot safely remain in their current lodgings, or services that provide measures to restore security such as repair of locks or boarding up of windows to prevent the immediate re-burglarizing of a home.

Support Services. Including follow-up counseling following the initial traumatic event; reassurance, empathetic listening, and guidance for resolving practical problems created by the victimization experience; acting on the victim's behalf vis-à-vis other social and criminal justice agencies; assistance in obtaining the swift return of

property being kept by police as evidence; intervention, as appropriate, with landlords, creditors, or employers; and referral to other sources of assistance, as needed.

Court Related Services. Services that assist crime victims in participating in criminal justice proceedings, including transportation to court, child care, escort services and the filing of elder abuse and child abuse petitions and temporary restraining orders.

Liability Insurance. Professional liability insurance for an individual, such as a nurse or therapist, is allowable.

Public Presentations. VOCA funds may be used to support presentations that are made in schools, community centers or other public forums, and that are designed to identify crime victims and provide or refer them to needed services. Specifically, activities and costs related to such programs, including presentation materials, brochures, and newspaper notices, can be supported by VOCA funds. Community education cannot be the primary focus of staff positions supported by VOCA funds.

Necessary and Essential Costs. This includes prorated costs of rent, telephone services, transportation costs for victims to receive services, emergency transportation costs for victims to receive services, emergency transportation costs that enable a victim to participate in the criminal justice system, and local travel expenses for service providers.

UNALLOWABLE COSTS AND ACTIVITIES

Crime Prevention. VOCA funds may not be used for crime prevention activities. One exception to this exclusion is crime prevention activities related to efforts specifically included in providing emergency assistance after victimization, such as services to prevent the immediate re-burglarizing of a home. Programs in which crime victims are not the sole or primary beneficiaries of funded activities are ineligible.

Lobbying, Legislative, and Administrative Advocacy. Lobbying for particular victim legislation or administrative reform, whether conducted directly or indirectly, is an activity ineligible for VOCA funding. Staff time funded by VOCA (or used as match for a VOCA-funded project) may not be spent lobbying or legislative and administrative advocacy.

Perpetrator Rehabilitation and Counseling, and Provision of Services to Incarcerated Individuals. Subrecipients cannot knowingly use VOCA funds to offer rehabilitative services to offenders. Likewise, VOCA funds cannot support services to incarcerated individuals, even when the service pertains to the victimization of that individual.

Needs Assessment, Surveys, Manuals, and Protocols. The use of VOCA funds to conduct needs assessments, surveys, development of manuals and protocols or to perform general administrative tasks does not fall within the intent of the Act and is outside the scope of the Program Guidelines.

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

Equipment Purchases/Capital Expenditures. Only equipment determined to be necessary and essential to the delivery of direct service as deemed by OVC and/or GMB is an allowable cost.

Professional Services of Doctors and Lawyers. The payment of fees for professional services rendered by lawyers and doctors in most instances extend beyond the intent of the Act, and are, therefore, ineligible for VOCA funding. According to OVC, victims treated for crime related injuries are encouraged to seek reimbursement for medical services rendered by doctors from their state crime victim compensation program.

The above does not prohibit direct service programs from hiring as staff salaried medical/mental health professionals to provide services on site to clients. This differs significantly from a case by case fee-for-service arrangement. Non-emergency legal services are not allowable.

Witness Management and Notification Programs. Projects whose primary objectives are to improve the prosecutorial efficiency of a prosecutor's office and whose goals are primarily witness management and notification are identified as administrative in nature and are, therefore, ineligible for support.

However, Victim/Witness programs in prosecutor's offices which provide both direct services to victims, such as escort and transportation, and support and advocacy during the criminal justice process, as well as a wide range of other services, are eligible to receive VOCA funding only for the portion of the program that provides direct services to victims.

Criminal Justice Improvements. General criminal justice agency improvements or programs where crime victims are not the sole or primary beneficiaries are not eligible for VOCA funding.

Insurance. Liability insurance and policies for the repair of buildings and vehicles are incidental expenses, and are not necessary to the provision of direct services to crime victims as intended by the Act. Therefore, VOCA funds may not be used for these purposes.

Medical Costs. Hospital care, nursing home care, long term home health care costs and other in-patient treatment costs are unallowable services. VOCA victim assistance grant funds cannot support medical costs regardless of whether they are a result of victimization or not.

GENERAL FINANCIAL REQUIREMENTS AND INSTRUCTIONS

Grants funded under the VOCA Victims Assistance Formula Grant Program are governed by the financial management requirements of the Financial Guide published by the U.S. Department of Justice, Office of Justice Programs, Office of the Comptroller, <u>http://www.ojp.usdoj.gov/financialguide/index.htm</u> as well as, the Kentucky Justice and Public Safety Cabinet, Grants Management Branch, Policies and Procedures Manual, <u>www.justic.ky.gov/departments/gmb</u>.

All VOCA awards funded through the Grants Management Branch will be made on a reimbursable basis. Requests for reimbursement may be submitted on a quarterly or monthly basis. Once monthly or quarterly is selected, this method must remain throughout the award period. Reimbursement payments may be delayed if awardees do not adhere to program and financial reporting requirements.

Sound Financial Management. Each applicant will be required to describe the procedures utilized to ensure sound financial management of the agency.

- All subrecipients are required to establish and maintain accounting systems and financial records to accurately account for funds awarded to them. These records shall include both federal funds and all matching funds of state, local, and private organizations, when applicable. State recipients shall expend and account for grant funds in accordance with state laws and procedures for expending and accounting for their own funds. Subgrantees of states shall follow the financial management requirements imposed on them by states. (State and local procedures must ensure that subrecipients comply with the financial management standards found at 28 CFR Parts 66 and 70.)
- Applicants may be required to provide evidence of financial stability.

Accounting System. The subrecipient is responsible for establishing and maintaining an adequate system of accounting and internal controls for itself, and for ensuring that an adequate system exists for each of its subrecipients. An acceptable and adequate accounting system:

- Presents and classifies projected historical cost of the grant as required for budgetary and evaluation purposes;
- Provides cost and property control to ensure optimal use of funds;
- Controls funds and other resources to assure that the expenditure of funds and use of property conform to any general or special conditions that apply to the subrecipient;

- Meets the prescribed requirements for periodic financial reporting of operations; and
- Provides financial data for planning, control, measurement, and evaluation of direct and indirect cost.

Total Cost Budgeting and Accounting. Accounting for all funds awarded by the federal agency shall be structured and executed on a "total program cost" basis. That is, total program costs, including federal funds, state and local matching shares, and any other fund sources included in the approved project budget or received as program income shall be the foundation for fiscal administration and accounting. Unless otherwise prohibited by statute, applications for funding and financial reports require budget and cost estimates on the basis of total costs.

Commingling of Funds. Subrecipients are prohibited from commingling funds on either a program-by-program or project-by-project basis. Subrecipient accounting systems must ensure that the organization's funds are not commingled with federal funds. Each award must be accounted for separately.

Supplanting. Federal funds must be used to supplement existing funds for program activities and not replace those funds which have been appropriated for the same purpose. VOCA funds are intended to enhance or expand service, and are not intended to substitute for other sources of support.

Potential supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and possibly audit. If there is a potential presence of supplanting, the applicant or subgrantee 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.

Please note the following:

- a. If a new person is going to be hired to conduct project activities (i.e., the department's personnel strength is increased), his/her salary may be charged to the project.
- b. The salaries of existing personnel transferred to grant activities may be charged to the project as federal expenditures only if the original positions are filled with new personnel.

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

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

Administrative and Indirect Costs. VOCA funds may not be used to pay for administrative costs, except those directly related to completing the activities of the grant. Any costs not directly related to the program must not be included in either federal share or match.

Indirect costs are not permissible under VOCA funding guidelines, including depreciation. If an applicant has questions about the allowability of a particular cost, the applicant should consult with the designated GMB financial analyst.

Procurement Procedures. Subgrantees shall use procurement procedures and regulations as set forth in the <u>OJP</u> <u>Financial Guide</u>, which serves as a primary reference manual to assist award recipients in fulfilling their fiduciary responsibility to safeguard grant funds and ensure funds are used for the purposes for which they were awarded. The Guide should serve as a day-to-day management tool for OJP award recipients and may also be used by subrecipients in administering their grant programs. The provisions of the Guide apply to all grantor agency awards.

Matching Requirement. The purpose of matching contributions is to increase the amount of resources available to the projects supported by grant funds. Matching contributions of 20% cash or in-kind (50% for first-time proposals) of the total project cost (total cost is equal to the federal share plus the applicable match) are required for each VOCA-funded project and must be derived from nonfederal sources. All funds designated as match are

restricted to the same uses as the VOCA funds and must be expended within the grant period. Match must be provided on a project-by-project basis.

- Match Calculation. The following formula can be used to determine the VOCA match requirement where the federal share is 80% and the matching requirement is 20% (new projects have a 50% matching requirement).
 - Federal Share Requested divided by 80% = Total Project Cost
 - Total Project Cost minus Federal Share = Match Requirement OR Total Project Cost times Match % = Match Requirement

Example: \$30,000 federal share

- \$30,000 Federal Share Requested (÷) .80 or 80% Federal Percentage = \$37,500 Total Project Cost, then
- \$37,500 Total Project Cost (-) \$30,000 Federal Share Requested = \$7,500 Match Requirement OR \$37,500 Total Project Cost (*) .20 or 20% = \$7,500 Match Requirement
- Matching contributions can be either cash, in-kind, or a combination of both.
- **Cash Contributions** represent an applicant's cash outlay, including non-federal money contributed by public agencies and institutions, and private organizations and individuals. These items must be encumbered within the grant period. (See above section on pro-ration of costs.)
- In-Kind Contributions represent the value of non-cash contributions provided by the applicant. In-kind contributions may be in the form of charges for real property and non-expendable personal property and the value of goods and services specifically identifiable to the project. (See above section on pro-ration of costs.)
 - a. In-kind match may include donations of expendable equipment, office supplies, workshop or classroom materials, work space, or the monetary value of time contributed by professionals and technical personnel and other skilled and unskilled labor, if the services they provide are an integral and necessary part of a funded project.
 - b. The value placed on donated services must be consistent with the rate of compensation paid for similar work in the subrecipient's organization. If the required skills are not found in the subrecipient's organization, the rate of compensation must be consistent with the labor market. In either case, fringe benefits may be included in the valuation.
 - c. The value placed on loaned or donated equipment may not exceed its fair market value.
 - d. The value of donated space may not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in privately-owned buildings in the same locality.
- **Record Keeping.** Subrecipients must maintain records that clearly show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must be documented, and to the extent feasible, supported by the same methods used by the subrecipient for its own paid employees.

APPLYING FOR VOCA

Guidelines and Instructions. Guidelines and instructions may vary from year to year; therefore, applicants are strongly encouraged to review them carefully prior to beginning an application to become familiar with the requirements and restrictions regarding the use of VOCA funds. Use this information in the development of your project proposal.

Grant Proposal. All proposals should be concise, clearly written, and submitted through the Kentucky Justice and Public Safety Cabinet's Electronic Grants Management System (eGMS). Major points must be supported by local facts and data, with appropriate citations. While detailed project descriptions are necessary, please avoid voluminous and unneeded information. Likewise, what may be common knowledge to your staff or community may not be known by the Review Committee.

Letters of Support. All submissions must include three (3) original letters of support from other victim-related agencies within your community.

Application Submission. Applications must be submitted no later than the established deadline. GMB will not grant extensions of this deadline. Please note that GMB staff support is only available through close of business that day (4:30 PM EST).

THE ELECTRONIC GRANTS MANAGEMENT SYSTEM (eGMS)

All grant activities are managed through the Kentucky Justice & Public Safety Cabinet's electronic grants management system (eGMS). Applications must be submitted via eGMS by the application submission deadline referenced in this document¹.

New applicants must begin by establishing a user account at <u>www.kyjusticegms.com</u>; returning applicants who previously applied for grants in eGMS do not need to establish an additional account. Applicants are strongly encouraged to familiarize themselves with the system well in advance of the due date through use of the included user training materials. Applicants are advised to review the specific eGMS application well in advance, as there are numerous required fields and information, character limits, and required supporting attachments.

Note: validation of new user accounts will take 48-72 business hours.

Upon successful submission of an application, the Authorized Official, as designated in eGMS by the applicant, will receive a confirmation email; this should be retained for the applicant's records. Applicants have the ability to access the system after application submission to confirm status in the "Information" section or the screen header. If an applicant is unable to confirm submission status; believes the application has been cancelled in error; or believes a system error has occurred that prevented successful submission; s/he should contact GMB staff well ahead of the submission deadline in order to allow confirmation or further inquiry. Contact may be directed to the staff identified in these guidelines or by calling 502/564-3251 or emailing askgmb@ky.gov.

Requests for reconsideration of submission compliance will only be granted to users providing sufficient documentation of a) timely contact with GMB staff and b) identification of specific, verifiable system errors.

THE eGMS FORMS TREE

Guidelines & Instructions. Applicants are encouraged to read and understand the guidelines and instructions prior to preparing the application.

Agency Overview. To be eligible to receive VOCA funds, programs must be public or nonprofit organizations, or a combination of such organizations, and provide direct services to crime victims. The Agency Overview should be a brief description of the agency implementing the proposed grant project. Information should include mission statement and a list of staff to be funded with grant dollars.

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

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¹ If the date provided on the eGMS system differs from the due date provided in this document, applicants should contact GMB staff for clarification.

- 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, etc.)
- **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.

NOTE: Segregation of duties is a key internal control concept intended to prevent fraud and error. It should be maintained among designated grant officials to ensure that no individual has the ability to conceal or misdirect agency funds. VOCA applicants shall not assign dual roles to any single official.

General Information. Includes Project Title, Past Funding, Employer Identification Number, DUNS Number, Grant Period, Agency Type and Description, and Abstract.

See <u>http://fedgov.dnb.com/webform/displayHomePage</u> and <u>https://www.sam.gov/</u> for information on obtaining a DUNS Number and/or SAM (System for Award Management) registration.

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

Equal Employment. 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 turnaround reporting period) shall have a single organization wide 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. However a financial audit may be required for any project expending greater than \$100,000. Records must be available for review by appropriate officials including the federal agency, Kentucky Justice and Public Safety Cabinet, Grants Management Branch and the General Accounting Office (GAO). A copy of the most current audit report and any management letter(s) available 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.

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

Limited English Proficiency. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that 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.

Subgrant Report Information. The information provided by the applicant will be used to report to the Office for Victims of Crime in the event the applicant organization receives an award.

VOCA Application. The application is composed of the following elements:

- Application Terms and Conditions. Read carefully every year as terms and conditions can change.
- **Statement of the Problem.** Describe the problem(s) of crime victims in your community and include data that show the size and scope. Explain the impact of the problem within your community. Provide justification for funding this project. If the project includes expansion, be sure to include evidence

indicating the need for such growth. Include local and state data to support the problem, using appropriate citations. This section is crucial as it provides justification for funding of the project.

• **Goals and Objectives.** In presenting the goal, make sure it is concise and to the point. The goal should be the final result of your program. Goals are general descriptions of what you want to accomplish with the grant project in order to address the problem(s) outlined in your Problem Statement.

Objectives should be stated in measurable terms. For example: if the objective of your project is to provide crisis intervention and long-term therapy, you might state the objectives as follows: 1) The project will provide crisis intervention to sixteen domestic violence victims within the project period; and 2) The VOCA funded therapist will provide individual counseling for thirty victims of sexual assault during the twelve month project period.

Performance Measures explain how the program's effectiveness at meeting its objectives will be demonstrated and discuss the significance of the program's impact in assisting victims of crime. For each corresponding objective, describe: 1) what data is needed to prove the project is meeting its objective; 2) how it will be collected; 3) how it will be assessed/analyzed; and 4) the process for reporting the findings and outcomes which will measure the impact of the proposed efforts.

For example: "For the objective relating to increasing Emergency Protective Order service, project staff will maintain a database of all Emergency Protective Orders issued in ABC county, which will be logged from copies received from the Clerk's office. This database will record whether a particular protective order has been served to the respondent. The number of protective orders served versus not served will be reported to the Sheriff of ABC and to the Kentucky Justice and Public Safety Cabinet on a monthly or quarterly basis, as required, as well as in the Sheriff of ABC's annual report." OR "For the objective relating to increasing knowledge among trainees of Kentucky stalking laws, a pre-test, developed by XYZ to gauge existing knowledge of Kentucky stalking laws, will be administered prior to a training session and an identical post-test will be administered at the end of a training session. Project staff will compare pre-test scores to post-test scores to measure the percentage increase in knowledge, making note, as well, of particular areas of success or lack of success. This information will be provided quarterly to the Kentucky Justice and Public Safety Cabinet and on the implementing agency's website, as well as on the implementing agency's annual report."

- **Project Activities**. A concise summary of the proposed plan to achieve the goals and objectives of the project including a description of major tasks necessary to fully implement. Provides the "who, what, where, when and how" of the proposed project and includes a comprehensive performance timeline identifying milestones to be achieved in this project. This narrative ties activities to goals, objectives and the performance measures applicable to the proposed project.
- Attachments. Letters of support and a list of advisory group/board members are required for all applicants. KDVA/KASA Site Review Certification is required for state designated regional domestic violence shelters and/or rape crisis centers.
- **Past Progress Report.** Information that summarizes activities of the previously funded grant period(s). Restate the objectives and indicate the success of the project in the current and previous year(s). Discuss the outcome of the services provided and the victims served.
- **Coordination Narrative.** Providing assistance to victims of crime 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 Justice and Public Safety Cabinet 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 victims services with other agencies and individuals within the community.

BUDGET

General Instructions.

- The budget forms must be completed in detail, with amounts rounded to the nearest whole dollar.
- When preparing a proposed budget, keep in mind all five budget categories: *Personnel, Contractual Services, Travel/Training, Operating Expenses and Equipment.*
- Consider program goals and objectives and design the budget so that it best suits the overall effectiveness of the program.
- A budget checklist is provided at the end of these guidelines to assist in completing the VOCA application.
- Budget revisions may be required later based on availability of funds.

Budget Categories. The following is an overall view of all costs associated with VOCA Formula Grant Program funds.

PERSONNEL

Salary and Fringe Benefits. Staff salaries and fringe benefits are allowable when specifically related to providing direct services to victims. 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 (and name of employee, if available), monthly salary rate for the employee, the percentage of the employee's time to be devoted to the project and total employee cost for the project.
 - a. Where salaries apply to both project operation and non-project activity, or apply to two or more separate projects, pro-ration of costs to each activity must be made based on time and attendance reports.
 - b. Salaries for federally funded and match positions shall comply with state, city, county, or other relevant classification systems and shall be documented by appropriate time and attendance records.
 - c. Charges of the employees' time assigned to grant projects may be reimbursed or recognized only to the extent they are directly and exclusively related to grant purposes.
 - d. NOTE: in no case is dual compensation allowed.
- Funded part-time positions (positions devoting less than 100% of a standard work shift to the grant project) should be supported by a brief explanation of the incumbent employee's duties outside the grant project or by a statement that the employee is not employed elsewhere by the grantee. The employee's timesheets shall indicate such separation of time worked.
- Attach job description and resume of VOCA Project Staff (or a placeholder document for unfilled or proposed new Staff positions).
- **NOTE:** existing employees of the applicant may be transferred from other positions to fill the federallyfunded positions in the grant project; however, the positions vacated must be filled by new hires so that the applicant's full staff of non-grant employees is not reduced in number by the award of the grant.
- Payments for fringe benefits are allowable personnel costs but cannot exceed the amount paid by the employer. The fringe benefits must be reasonable and in line with state, city or county rates. Each type of employee benefit should be listed along with the total cost allowable to employees assigned to the project. Documentation of fringe benefits must be submitted with the budget to reflect the actual rates being paid by the employer. The following are considered allowable benefits:

- a. Health, Dental and Life Insurance, (Single Plan only)
- b. FICA
- c. Retirement
- d. Worker's Compensation
- e. Unemployment Insurance

Overtime. Overtime pay can be funded for personnel funded by the grant on a full-time basis whose duties are consistent with the VOCA-funded project. Overtime pay must be approved through the original grant application or through a subsequent Grant Adjustment Notice (GAN).

Prosecutor Based Advocates. By statute², 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. Subgrantees are required to contribute 200 volunteer hours regardless of whether or not the hours are used as match.

- All volunteer time utilized for the grant must be related to activities described in the grant.
- Volunteers must be at least 18 years of age and be performing professional duties related to the grant project. Completion of background checks on potential volunteers is strongly encouraged.
- An hourly rate is determined by the salary plus any applicable fringe benefits. The assigned rate should be based on what the agency would pay were the individual employed full time. Do not use the volunteer rate from an Internet site or one rate for all types of volunteer activities.
- In extenuating circumstances a waiver of this requirement may be granted at GMB discretion. Upon receipt of notice of award, subgrantees may use the Grant Adjustment Notice (GAN) tool to request a volunteer waiver

Exclusions – Personnel. The following <u>cannot</u> be funded or used as match:

- Clerical volunteer hours, unless approved in the original application as essential to the project.
- Salary and/or benefits that are greater than documented percentage of time spent on VOCA allowable activities. If employee works on multiple projects, they must keep <u>allocated timesheets</u>.
- Crisis line time if not supported by a time log, including the initials of the individual who took the call OR agency policies that require a crisis line staff/volunteer to be immediately available to
- Any activities that have a primarily recreational purpose.
- Job placement/counseling services. Case management and crisis counseling which discusses employment issues or makes referrals to job placement/counseling services is allowable.
- Fundraising activities.
- Criminal record background checks.
- Lobbying activities.

² KRS 69.350

accept calls at a designated number for a • Transitional housing facilities. designated period of time.

- Any health insurance rate not based on a single plan or only offered to a VOCA funded employee due to the availability of grant funds.
- Positions that existed prior to the grant and were funded from any source other than Grants Management Branch grant funds.

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

a. Reflect an after-the-fact accounting of the total activity and hours worked for which the employee is compensated and indicate the specific time worked on the VOCA-funded project.

For example, a full-time employee working 40 hours per week reports 15 hours on the VOCA-funded project and 25 hours worked on other activities. 37.5% of the employee's salary for the week may be paid with VOCA funds.

- b. Be prepared at least monthly and coincide with one or more pay periods.
- c. Include original signatures of the employee and approving supervisory official having firsthand knowledge of the work performed.
- Volunteer hours must be supported by timesheets indicating activity and hours worked and include original signatures of both the volunteer and at least one agency staff member.
- Documentation must reflect the actual rates being paid by the employer.
- Documentation of fringe benefits reflecting the actual costs paid by the employer.

CONTRACTUAL SERVICES

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

Contractual Arrangements with individuals must ensure that:

- Dual compensation is not involved (i.e., the individual may not receive compensation from his regular employer and the applicant for work performed during a single period of time even though the services performed benefit both).
- The contractual agreement is written, formal, proper and otherwise consistent with the applicant's usual practices.
- Travel and subsistence costs are at an identified rate consistent with the costs allowed.

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

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

TRAVEL/TRAINING

The cost of training for paid and volunteer staff identified in the application as part of the VOCA project is allowable. Use of VOCA funds is limited to staff development of direct service providers in individual projects to enhance their skills directly related to the program.

NOTE: Regardless of whether or not training costs are budgeted under the grant application, staff funded or whose salaries are used as match, in whole or part, must meet the training requirement by completing twelve (12) hours of victim assistance-related training during the grant award period.

- Travel/Training costs require a method of computation for each request (e.g., purpose, destination, lodging, mileage rates and per diem rates)
- 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 Adjustment Notice (GAN).
- Registration fees required for admittance to official travel meetings are reimbursable. If the fee entitles registrants to meals, claims for subsistence must be reduced accordingly.
- Requested travel expenses shall not exceed the established mileage and subsistence policy as set forth by the Commonwealth of Kentucky, Finance and Administration Cabinet. See 200 KAR 2:006 and http://finance.ky.gov/internal/travel for current rates and regulations.
- Transportation must be the most economical.
 - a. Bus, subway and taxi fares are allowed for city travel.
 - b. Commercial airline travel shall be coach/tourist class.
 - c. The cost of rental cars in lieu of ordinary transportation will be allowed only with acceptable justification.
 - d. Actual parking, bridge and toll charges are reimbursable.
 - e. Reasonable expenses for baggage handling, for delivery to or from a common carrier or lodging and for storage are reimbursable.
- **NOTE:** If the travel and reimbursement requirements of the applicant agency are more stringent than that of the Commonwealth, the more stringent of the two must be followed.

Exclusions – Travel and Training. The following <u>cannot</u> be funded or used as match:

• Management training.

- Telephone, tip charges, and laundry charges.
- Additional expense for first class travel.

Supporting Documentation – Travel and Training. All expenses shall be supported by receipts that indicate item of expense, date and time.

OPERATING EXPENSES

Operating expenses include items necessary and essential for the ongoing operation of the project. Allowable operating costs include:

- Advertising to recruit VOCA-funded personnel.
- Books, training manuals and videos for direct service providers within the VOCA funded organization.
- Utilities and security for the space used by the program whether owned, rented or are donated.
- Equipment usage fees supported by usage logs.
- Printing and distribution of brochures and similar announcements describing the direct services available and how they may be obtained.
- Supplies
- Postage

- Brochures and other printed materials shall include an acknowledgement of agency assistance and/or support conspicuously printed in the publication. Such statement may be made through use of the following or comparable footnote: "This project was supported by Grant No. (*insert correct grant number*) awarded through the Kentucky Justice and Public Safety Cabinet by the U. S. Department of Justice, Office of Justice Programs."
- Operating Expenses require a method of computation for each request (e.g., rent, total square feet, space requirements per VOCA staff person, total agency costs, allocation percentage, etc.)
- Items with a unit price of less than \$5,000 and usefulness less than one year.
- Items must be individually listed and through the original grant application or through a subsequent Grant Adjustment Notice (GAN) prior to the actual expense.
- Items should be listed by major type (e.g., office supplies, training materials, research forms, telephone, postage, etc.)
- Large items should be separately listed and identified (e.g., unusual supply items, special printing or mailings required for project, etc.)
- On miscellaneous expenses, a specific itemization of each type of expense with basis of computation should be provided.
- Indicate how funds are to be allocated if used as match or only partially funded by the grant.
- The budget narrative page should be used to indicate the basis for computation (i.e.: "x" dollars per month for office supplies, "y" dollars per person for training materials, "z" dollars per month for telephone-long distance telephone service, etc.)

Exclusions – Operating Expenses. The following <u>cannot</u> be funded or used as match:

- If the applicant agency or a related party owns the space used by the program, the fair market rental value of the space cannot be used as match or reimbursed under the federal share.
- Some law enforcement equipment, 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, and other indirect organizational costs such as depreciation, property taxes, maintenance, and janitorial.
- Audit costs, even if required under federal guidelines.

- In-kind rent when not supported by a recent, written fair market rental value estimate from a real estate professional or landlord.
- 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.
- Accounting services.
- Janitorial, cleaning, and/or lawn care supplies.

• Tax return fees.

Supporting Documentation – Operating Expenses. Operating expenses shall be supported by invoices and proof of payment.

EQUIPMENT

This category includes items with a unit price of \$5,000 or more and usefulness greater than one year, e.g. furniture, fixtures, office machines, etc.

NOTE: items with a unit price less than \$5,000 and usefulness of less than one year should be placed in the "Operating Expenses" category.

The applicant must adhere to the following principles:

- Items of equipment must be individually listed and approved through the original grant application or in subsequent grant adjustment notices prior to the purchase of the equipment.
- No other equipment owned by the applicant is suitable for the effort.
- Equipment purchased and used commonly for two or more programs has been appropriately prorated to each activity.
- Authorization for equipment will be based on the applicant's demonstration that the requested equipment is necessary and essential to the successful operation of the grant project.

Exclusions – Equipment. The following <u>cannot</u> be funded or used as match:

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

Supporting Documentation – Operating Expenses Equipment purchases shall be supported by invoices and proof of payment.

Source of Match. Provide information concerning the source of the matching contribution.

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

Budget Summary. Applicants will complete the form provided using the categories and costs identified in their budget narrative.

APPLICATION REVIEW AND APPROVAL

When a completed application has been submitted, it shall be subject to programmatic and financial review. Applications are reviewed by appropriate GMB staff and also by an independent review committee of subject matter experts using set review criteria and assigned point values specific to the program.

A review committee of subject matter experts will review all completed applications. An average score is determined from each reviewer's results, based on the criteria set forth in these guidelines. Applications receiving an initial score between 65% and 69% will be contacted to provide additional information; however, applications receiving an initial score of less than 65% will not be contacted for follow-up information. Applications receiving a "final" score of less than 70% will not be funded.

NOTE: An applicant's history of delinquent programmatic or financial reports or other non-compliance issues will be taken into consideration when applications are scored.

- Following the initial review and scoring of the application by the independent review committee, GMB Program, Financial, and Administrative staff will perform administrative review of the application.
 - a. GMB staff retains discretion to request additional information or explanation from the applicant in order to complete the review of the application, or to submit recommendations to the Secretary of the Justice and Public Safety Cabinet to approve awards with special conditions; not fund a program or some percentage thereof; or other action deemed appropriate by GMB

staff based on evaluation of historical performance, management of grants, and overall funding available with which to make awards.

- b. Notification of further action needed by an applicant may be in the form of an eGMS systemgenerated message, written letter, email, or telephone call. Failure to respond in the time frame specified may result in the application being removed from further consideration for funding during that application period. Responses to requests for follow-up information will be used to further consider the request for funding.
- Final award recommendations are made by the GMB Branch Manager to the Kentucky Justice and Public Safety Cabinet and/or Executive Staff of the Commonwealth after consideration of Cabinet priorities, application scores, prior performance and management of grants, and availability of grant funds with which to make awards. Final approval of all grant applications rests with the Cabinet and/or Executive Staff, who will provide GMB with approval to notify applicants of the funding determination.

For additional information on the application review process, please see the Kentucky Justice and Public Safety Cabinet, Grants Management Branch, Policy and Procedure Manual at <u>www.justice.ky.gov/departments/gmb</u>.

Funding Categories and Priority Programs. 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. According to the directive of the Office of Victims of Crime, at least ten percent of the state's total VOCA allocation must be awarded to each of the four Priority Categories.

The first three priority categories have been clearly defined by Congress as being victims of child abuse, victims of domestic violence, and victims of sexual assault. A fourth category was added in 1988, for previously underserved victim populations, to be defined by each state. Subsequent to publishing the initial program guidelines, OVC has determined that victims that fall under the first three priority categories will not be eligible for consideration under the category of "previously underserved."

According to the directive of the Office of Victims of Crime, at least ten percent (10%) of the state's total VOCA allocation must be awarded to each of the four Priority Categories.

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.

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

Review Criteria. Application components are assigned a score according to a reviewer's comparison of the proposal to particular criteria. Scoring guidelines are available on the Justice and Public Safety Cabinet Grants Management Branch website at www.justice.ky.gov/departments/gmb.

AWARD NOTIFICATION AND ACCEPTANCE

Notification. Recipients of awards will be notified by U.S. mail and will receive further instructions on award acceptance from Grants Management Branch staff via mail, phone, or email. Award announcements cannot be made without approval from the Justice and Public Safety Cabinet or Executive Staff.

Special Conditions. All awards include general and special conditions that the subgrantee must meet if the award is accepted. Subrecipients are encouraged to read and understand the conditions carefully prior to accepting the award. Questions may be directed to GMB staff.

If awarded VOCA Victim Assistance funds, the subgrantee agrees to promptly refer 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. When the subgrantee is notified that the award binder is available in eGMS, the subgrantee has fifteen (15) business days to accept the award by obtaining appropriate signatures and uploading the entire award document back into eGMS. If the acceptance process is not completed within the allotted time period, GMB reserves the right to withdraw the award.

NOTE: The award document must be signed by all three (3) individuals that the applicant listed in the "Contact Information" section of the application.

POST-AWARD REQUIREMENTS

Subgrantee Reporting. Subgrantee tracking and reporting of VOCA funds, outcomes, and benefit data are required through submission of monthly or quarterly financial and quarterly programmatic progress reports. Reports are due by the 15th calendar day of the month following the close of a reporting period.

Evaluation and Monitoring. Grants Management Branch monitoring includes desk review of financial and program reports submitted by the subgrantee on a quarterly basis and periodic on-site monitoring to review grant compliance, assess management controls, evaluate the applicable activities and provide technical assistance. In addition, the subgrantee agrees to maintain and provide any data or information requested for the purposes of monitoring and program evaluation. For additional information, see GMB Management Policies and Procedures Manual, <u>www.justice.ky.gov/departments/gmb</u>.

BUDGET CHECKLIST

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

SECTION I. PERSONNEL

Salaries

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

Fringe Benefits

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

SECTION II. CONTRACTUAL SERVICES

- \Box Is the type of each service to be rendered described?
- □ For individuals:
 - Is an hourly or daily rate given?
 - Are base rates justified and reasonable?
- □ Is the total amount for any contract in excess of \$10,000? If so, has the applicant indicated that services have been or will be obtained by acceptable procurement procedures?
- □ Is "sole source" an issue? If so, is justification included?

SECTION III. TRAVEL

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

SECTION IV. OPERATING EXPENSES

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

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

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

SECTION VI. SOURCE OF MATCH

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

SECTION VII. BUDGET SUMMARY

- □ Are all requested costs justified, reasonable and allowable?
- □ Are requested costs properly categorized?
- □ Are all line item computations correct and do they equal the category totals?
- □ Have the appropriate costs/percentages been identified as federal and match?
- Are all requested costs in line with actual costs in previous grants?