



# The State of Rhode Island

---

Public Safety Grant  
Administration Office

4/18/2023

POLICIES AND  
PROCEDURES

## Table of Contents

INTRODUCTION .....	3
Common Acronyms.....	3
PSGAO STAFF .....	3
Timesheets.....	3
Award Creation - Checklist.....	4
Procurement .....	4
Access to Public Records.....	4
Travel .....	4
Record Retention .....	5
REIMBURSEMENT PROCESS.....	5
Reimbursement .....	5
Process .....	6
FISCAL CONDITIONS.....	8
Non-Supplanting .....	8
Indirect Costs .....	8
Program Income.....	8
Fiscal Administration.....	9
Subrecipient Accounting System .....	9
Single Audit .....	9
Unencumbered/Unexpended Funds .....	10
Loss, Damage, Theft of Equipment .....	10
Conferences .....	10
Trinkets .....	11
Food and Beverage Expenditures .....	11
Consultants .....	11
Travel .....	12
Modification and Extension of Approved Budget.....	12
Second Tier Awards.....	12
SUBGRANT MONITORING .....	12
Purpose .....	12
Pre-Award Risk Assessment.....	13
Levels of Monitoring .....	14

**The State of Rhode Island – Public Safety Grant Administration Office**

Level 1 Monitoring ..... 14

Level 2 Monitoring ..... 14

Site Visit..... 15

PMT and Mandatory Reporting ..... 15

Suspicion of Fraud, Theft, or other Illegal Activity..... 16

Remedies for Noncompliance..... 16

RECORD KEEPING AND FILE MANAGEMENT..... 17

VICTIMS OF CRIME ACT..... 17

VOCA Advisory Committee and Project Selection ..... 18

Project Period ..... 18

Applicable Federal Regulations..... 18

Performance Measurement Tool..... 19

ELIGIBLE APPLICANTS..... 19

New Applicants ..... 21

Allowable Costs..... 21

Unallowable Costs..... 23

Food ..... 24

APPENDIX A: USEFUL LINKS ..... 25

APPENDIX B: AWARD CREATION CHECKLIST ..... 27

## INTRODUCTION

This manual is intended to serve as a supplement and update to the Public Safety Grant Administration Office’s (PSGAO) Policies and Procedures manual as codified in the Rhode Island Code of Regulation (RICR). When managing federal grants, the PSGAO is bound by federal law and regulations including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. § 200), the current edition of the Department of Justice (DOJ) Grants Financial Guide, and program specific rules/conditions.

### Common Acronyms

- PSGAO Public Safety Grant Administration Office
- C.F.R. Code of Federal Regulations
- R.I.C.R. Rhode Island Code of Regulations
- DOJ Federal Department of Justice
- OJP Federal Office of Justice Programs
- OVW Federal Office on Violence Against Women
- OVC Office for Victims of Crime
- RFP Request for Proposals
- SAA State Administering Agency
- VOCA Victims of Crime Act
- CAP Corrective Action Plan
- PMT Performance Measurement Tool

## PSGAO STAFF

### Timesheets

Charges made to Federal awards for salaries, wages, and fringe benefits must be based on records that accurately reflect the work performed.

Pursuant to Compensation-personal services, 2 C.F.R § 200.430, employees paid with Federal grant funds will complete personal activity reports (Time sheets) to document the amount of time spent on grants. A time sheet will be utilized and should reflect the activity of the employee on a weekly basis, signed by the employee, and approved by the Administrative Manager.

## The State of Rhode Island – Public Safety Grant Administration Office

The time sheet should reflect all grants that the employee may reasonably work on, regardless of whether any time is charged in that week. When issuing new grant awards grant managers should check their timesheets to ensure that all appropriate grants are reflected.

### Award Creation - Checklist

The PSGAO has created an “Award Creation Checklist” that will be placed in each subgrant file, that will be completed by the grant manager and submitted to the Administrative Manager with the first subgrant reimbursement request. This form is to notate that appropriate items have been placed in the grant file.

This includes a review of any federal special conditions or holds on grant funds. In the event that any condition or hold is ambiguous, grant managers should contact their DOJ grant manager for guidance.

Grant managers must also complete any FFATA reporting as soon as possible and before any reimbursement will be issued.

### Procurement

The PSGAO will procure goods and services in a manner consistent with standards set by the Rhode Island Department of Administration, promulgated under Purchasing, 220 RICR-30-001, which is mandated under Procurements by States, 2 C.F.R § 200.317. In addition to complying with the Department of Administration regulations, PSGAO must comply with Procurement of Recovered Materials, 2 C.F.R § 200.322 and Contract Provisions, 2 C.F.R § 200.326 when expending federal funds.

### Access to Public Records

The PSGAO is subject to the Rhode Island Department of Public Safety Access to Public Records Regulation, 270-RICR-40-00-1.

### Travel

Out of state travel must conform to the State of Rhode Island Department of Administration’s Out of State Travel Policy. PSGAO staff must seek approval from the Administrative Manager to attend an out-of-state function.

Grant administrators may have need to travel in-state to perform site visits or attend meetings. In state travel must conform to the State of Rhode Island Department of Administration’s In State Travel Policy. It is the responsibility of the traveler to enter mileage and reimbursement expenses into the State’s mileage reimbursement system, <http://www.travel.ri.gov/>.

## Record Retention

The PSGAO will adhere to the record retention policy as required by the Rhode Island Secretary of State's Office, published on their website: <https://www.sos.ri.gov/divisions/frequent-filers/records-management/records-retention-schedules>. At a minimum, records will be kept for three years from the date of submission of the final expenditure report as described in Retention requirements for records, 2 C.F.R. § 200.334 Retention requirements for records.

## REIMBURSEMENT PROCESS

### Reimbursement

The PSGAO processes all grants, including VOCA, as reimbursement-based programs; funds may not be expended in advance. Grant administrators will review all requests for reimbursement for accuracy, clarity, compliance with the original budget, and adherence to federal standards. **Subrecipients shall not be reimbursed until reviewed by a basic desk audit.** Subrecipients must use the current reimbursement forms provided by the PSGAO.

To receive reimbursement for expenditures, subrecipients **must** submit:

- A current SF-260-R Grant Reimbursement Request and Fiscal Report Form (either monthly or quarterly)
- A Subgrant Program Progress Report with a brief narrative describing the progress of the funded program on page 1 and a list of the program's Objectives and Accomplishments on page 2. Progress Reports should describe activities and expenditures in your SF-260-R (Applies to certain grants including VOCA)
- A cover sheet with a list of documents included with the SF-260-R
- Appropriate backup documentation for expenditures, i.e. invoices with proof of payment (copies of canceled checks, receipts, banks statements) payroll documentation, etc.

Additionally, please note:

- Grant reimbursements are only processed once per month on the 20th of the month
- Reimbursements must be submitted a minimum of once per quarter. Monthly reimbursements are allowed.
- If a subrecipient is experiencing delay requesting reimbursement, for example if a new project experiences difficulty hiring a qualified candidate, subrecipients should email their grant manager to inform them of this delay.

## The State of Rhode Island – Public Safety Grant Administration Office

- Reimbursements will not be processed if required quarterly online Performance Measurement Tool (PMT) reporting is not completed and if the quarterly narrative progress report has not been submitted.

### Process

The following is intended to be descriptive of the reimbursement process in order increase transparency to assist subrecipients program planning:

- All payments to subrecipients are made on a reimbursement basis, with appropriate backup documentation for the expenditures.
- Subrecipients may seek reimbursement on a monthly or quarterly basis.
- Subrecipients are encouraged to submit their requests by the 20<sup>th</sup> of the month because the PSGAO processes payments on the 20<sup>th</sup>.
- Grants are typically awarded in connection with the Federal Fiscal Year. Quarter 1 runs from October 1 to December 31, Quarter 2 from January 1 to March 31, Quarter 3 from April 1 to June 30, and Quarter 4 from July 1 to September 30.
- If a reimbursement is incomplete or otherwise unable to be processed during the requested period, the PSGAO will prioritize that request if possible during the next draw down period. If the reimbursement request was quarterly, the request will be processed in the next month (and not the next quarter) in order to minimize impact upon the subrecipients program.
- Grant administrators perform a desk audit for every reimbursement request.
- Grant administrators validate line item expenditures, ensure supporting documentation is sufficient, accounting is accurate, all programmatic and fiscal progress reports have been filed, and reviews all subrecipient payment requests to ensure all costs are allowable. All costs must align with the project budget. They must conform to federal law and grant terms, be consistent with state and local policies, be adequately documented, and not included as match.
- The grant administrator forwards the request to the Administrative Manager.
- The Administrative Manager reviews reimbursement requests, signs them as approved and provides a copy to the grant administrator.

**The State of Rhode Island – Public Safety Grant Administration Office**

- The Administrative Manager prepares grant worksheets, attaches reimbursement requests and gives them to the financial administrative assistant to be processed in the state financial system for payment.
- The Administrative Manager draws down funds utilizing the federal Grant Payment Request System (GPRS) to cover reimbursements, only drawing funds to cover immediate reimbursements as per OJP Financial Guide.
- Worksheets for drawing funds are sent to the Central Management Office to be deposited into the appropriate accounts within RIFANS once the funds are transferred to the State.
- After processing the reimbursement requests in the financial system and forwarding the documentation to the Office for Accounts and Control for actual payment, copies of the payment requests are returned to the Administrative Manager.
- The Administrative Manager updates the ledgers for each grant, documenting actual expenditures, local match, and program income, if applicable
- Quarterly, the Administrative Manager prepares the Federal Financial Reports SF-425 from the payment requests that have been processed, reporting actual funds spent, ledgers. The summary information will include matching funds and indirect costs for the reporting period as well as program income cumulatively.
- The Fiscal Assistant grant manager will compile the information for the Administrative Manager. The Administrative Manager will then review the compiled data for accuracy before it is entered into the JustGrants portal.
- The Administrative Manager will enter the data into the JustGrants portal. Before submitting the Federal Financial Report, the Administrative Manager and Fiscal Assistant will confer to ensure the data is accurately entered.
- Once in agreement, the Administrative Manager will submit the Federal Financial Report.
- Backup documentation for all funds drawn down are attached to the quarterly FFR and filed in the financial folder for the grant program involved.
- After filing the Federal Financial Reports, the payment requests are returned to the Financial Administrative Assistant to reconcile the financial folders with the ledgers.



## FISCAL CONDITIONS

Subrecipient shall comply with the financial and administrative requirements set forth in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. § 200), the current edition of the Department of Justice (DOJ) Grants Financial Guide, and program specific rules/conditions. This includes any special conditions issued by DOJ or PSGAO. Not all of these requirements and conditions are included in this document; however, in general, PSGAO grants are subject to and incorporate by reference, the following fiscal requirements and conditions:

### Non-Supplanting

Federal funds may be used only to supplement and not supplant state or local funds otherwise available for law enforcement, criminal justice, and victim service programs.

### Indirect Costs

Indirect costs are costs of an organization that are not readily assignable to a particular project but are necessary to the operation of the organization and the performance of the project. Such costs are generally identified with the organization's overall operation and are further described in the Uniform Administrative Requirements, Costs Principles, and Audit Requirements in 2 C.F.R. § 200, as adopted and supplemented by the Department of Justice in 2 C.F.R § 2800 (the "Part 200 Uniform Requirements"). The cost of operating and maintaining facilities, depreciation, and administrative salaries are examples of indirect costs.

Indirect costs are allowed if subrecipient has a current federally approved indirect cost rate. Subrecipient must provide a copy of the federally approved indirect cost rate agreement to the PSGAO. Subrecipient that has never received a federally approved indirect cost rate may use the Certification of 10% De Minimis Indirect Cost Rate.

### Program Income

Program income means gross income earned by subrecipient that is directly generated by a supported activity or earned as a result of the federal award during the project period. Subrecipient can use program income to advance program objectives or refund the income back to the PSGAO. Program income may only be used for allowable program costs. Unless otherwise stipulated in the award, any program income earned during the project period but not utilized for the project must be refunded to the PSGAO. Prior approval to expend the funds for program purposes must be obtained from the PSGAO prior to the expenditure of such funds. Program income shall be reported by Subrecipient to the PSGAO

### Fiscal Administration

Subrecipient's records concerning the grant project must be made available for inspection and audit by authorized federal and state officials in accordance with the DOJ Grants Financial Guide.

### Subrecipient Accounting System

Subrecipients should maintain an accounting system that:

- Establishes a separate account for the grant project with separate accountability of receipts, obligations, expenditures, and balances for each fiscal budget period.
- Itemizes all supporting records of grant receipts and expenditures in sufficient detail to document the exact nature of fiscal activity for each fiscal budget period.
- Provides data and information for each expenditure with proper reference to a supporting voucher or bill properly approved.
- Maintains payroll authorizations and vouchers.
- Maintains a time-reporting system for personnel charged to grant.
- Maintains adequate records supporting charges for fringe benefits.
- Maintains adequate records supporting charges for equipment.
- Project accounting records should also reflect program income received, if any, through fees, contributions, or payments by third party. Maintains supporting records of income received, expended, and balances for each fiscal budget period.

### Single Audit

The DOJ Grants Financial Guide and the Uniform Guidance 2 CFR § 200 state that if a subrecipient is a non-federal entity that expended \$750,000 or more in federal funds during subrecipient agency's fiscal year, Subrecipient is required to arrange for a single organization-wide audit (Single Audit) conducted in accordance with the provisions of Title 2 CFR Subpart F. If applicable, Subrecipient shall submit a copy of their audit report to the Federal Audit Clearinghouse and to the PSGAO.

Subrecipient shall comply with the applicable audit requirements of 2 CFR § 200, and further understands that funds may be withheld, or other related requirements may be imposed, if outstanding audit issues (if any) are not satisfactorily and promptly addressed as further described in the audit requirements and current edition of the DOJ Grants Financial Guide. Failure to comply with audit requirements may result in the withholding of new awards and/or withholding of funds.

## The State of Rhode Island – Public Safety Grant Administration Office

All Subrecipients and applicants subject to a Single Audit shall upload their Single Audit into the State's eCivis Grant Management System. PSGAO staff shall use the tools in the eCivis system to review the Single Audits for any adverse findings. The eCivis system has additional tools for risk assessment and subrecipient monitoring. PSGAO staff shall use these tools to conduct an appropriate risk assessment which may result in increased monitoring, higher risk assessment categorization, or potential suspending of funding. PSGAO may also issue a corrective action plan to address any subrecipient audit findings if necessary.

### Unencumbered/Unexpended Funds

Funds provided to subrecipient that are unencumbered on the date the project terminates shall be returned to the PSGAO. Funds that are encumbered but not disbursed within 60 days after the project terminates shall be returned to the PSGAO.

### Loss, Damage, Theft of Equipment

Subrecipient is responsible for replacing or repairing equipment that is willfully or negligently lost, stolen, damaged, or destroyed. Any loss, damage, or theft of the property must be investigated and fully documented and made part of the official project records. Subrecipient cannot use Federal funds to replace or repair equipment that is willfully or negligently lost, stolen, damaged, or destroyed.

### Conferences

The DOJ defines conferences defined broadly and includes meetings, retreats, seminars, symposia, and training activities. A conference typically is a prearranged formal event with at least some of the following characteristics: designated participants and/or registration; a published substantive agenda; and scheduled speakers or discussion panels on a particular topic. A conference typically is not a routine operational meeting, a law enforcement operation or prosecutorial activity in connection with a specific case or criminal activity, a testing activity, or a technical assistance visit.

Reasonable conference-related activity costs are allowable uses of funds as long as the grant budget has been approved by the PSGAO. Subrecipient shall comply with all applicable laws, regulations, policies, and guidance (including specific cost limits, prior approval and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences, meetings, training, and other events.

Subrecipient should become familiar with the Policy and Guidance for Conference Costs applicable found in the DOJ Grants Financial Guide. OJP periodically revises the policy and guidance for conference costs, therefore, Subrecipient must comply with the provisions of the

most current policy/guidance. Failure to comply with these conditions may result in the denial, reduction, or termination of funding.

Some conferences may require pre-approval from DOJ in addition to the PSGAO and any subrecipient wishing to host a conference should contact the PSGAO early in the planning process.

### Trinkets

Trinkets (items such as hats, mugs, portfolios, t-shirts, coins, gift bags, etc., regardless of whether they include the conference name or OJP/DOJ logo) must not be purchased with grant funds as giveaways for conferences. Basic supplies that are necessary for use during the conference (e.g., folders, name tags) may be purchased. Gifts, honorariums, leis, etc. cannot be purchased with grant funds. Trinkets for any non-conference purpose are most often unallowable.

### Food and Beverage Expenditures

Food and beverage expenditures are generally not allowable and will not be reimbursed. The DOJ Financial Guide only allows food and beverages in extremely limited circumstances and may require prior approval from the DOJ – typically 90-120 days prior to the event. Food and beverage rules often vary by grant, and subrecipients should contact their grant manager prior to expenditures.

### Consultants

Compensation for individual consultant services is to be reasonable and consistent with the amount paid for similar services in the marketplace. Effective June 1, 2014, the maximum allowable rate is \$650 per day (excluding travel and subsistence costs) for an eight-hour day or \$81.25 per hour. An eight-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance. Please note, however, that this does not mean that the rate can or should be the maximum limit for all consultants. Any subrecipient wishing to exceed to daily maximum must get written pre-approval from the PSGAO or the expense may be deemed unallowable.

When the rate exceeds the limit for an eight-hour day, or a proportionate hourly rate (excluding travel and subsistence costs), subrecipient must request written approval from the PSGAO, prior to obligating grant funds.

Refer to the DOJ Grants Financial Guide for additional information. It is recommended that subrecipients contact the PSGAO to ensure that the compensation they are planning to pay

a consultant is at the market rate and meets federal requirements. Time and activity reports are required for consultants.

### Travel

Subrecipient travel expenses are allowable and may be reimbursed in a manner consistent with Travel Costs, 2 C.F.R § 200.474 and the Department of Justice Grants Financial Guide.

### Modification and Extension of Approved Budget

Requests for modification or an extension of an approved budget must be submitted in writing to the PSGAO in advance of the obligation of expenditures. All requests must be submitted by subrecipient no later than 45 days prior to the project end date. Requests shall be reviewed by the PSGAO for consistency with federal requirements and project goals and objectives. Requests should include a proposed budget and narrative where appropriate. Approval shall be given in writing only.

Extensions can only be granted if allowable under the federal rules, and may require DOJ approval. Subrecipients wishing to extend their budget should contact the PSGAO as soon as they believe one so a determination of federal allowability may be made.

### Second Tier Awards

Subrecipients must have a policy in place that addresses the monitoring requirements including financial rules and regulations according to 2 C.F.R. § 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and programmatic requirements outlined by the VOCA Program Guidelines and Final Rule. Subrecipients must have a policy in place regardless of whether they intend to make a second-tier award.

## SUBGRANT MONITORING

### Purpose

Federal grants are subject to a variety of rules and regulations. The PSGAO monitors all subrecipients to ensure grant funds are used pursuant to the relevant federal standards and any applicable special conditions. During the course of a grant's lifecycle, PSGAO grant administrators will maintain regular contact with subrecipients. Grant administrators will monitor and review multiple components of a subrecipient's program, including:

- Organizational operations
- Internal controls and reporting

## The State of Rhode Island – Public Safety Grant Administration Office

- Policies and procedures
- Financial reports
- Programmatic records

Grant administrators review all subrecipients with two major categories in mind: programmatic and financial. Programmatic refers to whether the subrecipient is implementing their plan according to their initial application and whether the plan is effective. For example, in a program designed to provide direct services to victims, grant administrators will review how many victims were served, with what services, and how it relates to the initial grant application. Financial questions relate to whether grant funds are being used in accordance with federal guidelines and ensuring that subrecipients keep clear and accurate records.

Grant administrators will review all requests for reimbursement for accuracy, clarity, compliance with the original budget, and adherence to federal standards. **Subrecipients shall not be reimbursed until reviewed by a basic desk audit.**

Grant administrators may at any time request financial data such as timesheets, invoices, contracts, financial policies, audit reports and ledgers that tie back to financial reports.

### Pre-Award Risk Assessment

A program receives a risk value based on circumstances of the grant, past performance, individual situations, information gathered during the application or monitoring process and other criteria deemed relevant by the grant administrator. Criteria that may be considered are the applicant's organizational financial stability; applicant's quality of management systems and ability to meet guidance management standards, applicant's performance history, applicant's audit reports and findings. Utilizing a risk assessment tool, a program is given a numeric value which will indicate if the program is high risk, medium risk or low risk.

The grant administrator will complete a risk-based desk audit on all new awards at the end of the first quarter. A low risk will have a score of 0 – 3 and will only require a site visit during the period of performance. A medium risk will have a score of 4 – 8 and will require the site visit be done within a two-month time frame. A high risk will have a score of 9 + and will require a site visit to occur within two to four weeks.

The PSGAO uses the Pre-Award Risk Assessment to determine the initial level of monitoring for all new awards. High risk subrecipients will be subject to initial Level 2 monitoring and be subject to additional conditions to monitor the risk.

## Levels of Monitoring

### Level 1 Monitoring

Level 1 is the standard monitoring level and encompasses the day to day communication between grant administrators and subrecipient. Grant administrators review all incoming reimbursement requests, program updates, and grant modification requests. The PSGAO will contact the subrecipient directly by email or phone if there are any discrepancies, irregularities, or other causes of concern in attempt to remedy the issue. Grant administrators may request additional documentation or updates to previous documentation such as timesheets, policies, or financial records. This level of monitoring is meant to assist subrecipients to comply with relevant regulations.

Failure to timely comply with any document requests or to adequately address any discrepancies will cause the PSGAO to send a “Draft Notice of Noncompliance” to the project director with a two-week period in which to rectify the concerns prior to the issuance of formal Notice.

The Notice of Noncompliance shall state the cause(s) for concern, suggested resolutions, and a deadline for compliance, typically within 45 days. A longer time period may be granted within the discretion of the grant administrator and is issue dependent.

Additionally, repeated requests for unallowable expenses will cause, at the discretion of the grant manager, a “Notice of Noncompliance – Unallowable Expenses” to be placed in the grant file and shall list the dates that unallowable expenses were requested, a description of the requests, and a brief description of the PSGAO’s responses.

### Level 2 Monitoring

If a subrecipient subsequently fails to address the issue contained in the Notice of Noncompliance, then, with the approval of the Administrative Manager, the subrecipient shall be upgraded to Level 2 monitoring and the PSGAO shall issue a “Corrective Action Plan” (CAP). The CAP may require bi-weekly or monthly status reports, additional site visits, mandatory training, or increased financial supervision. These conditions are individualized to the subrecipient and intended to ensure compliance with federal and state rules. Pursuant to Specific conditions, 2 C.F.R. § 200.207, the PSGAO has the authority to impose conditions as needed.

If any subrecipient disagrees with the suggested CAP, then within 30 days they may request a conference with the grant administrator and Administrative Manager in order to formulate an appropriate CAP.

### Site Visit

The PSGAO intends to conduct a site visit of all subrecipients annually or at a minimum of once during the award's lifecycle. The site visit is conducted independently of subrecipient risk or audit status. The site visit provides the opportunity to see the subrecipient's plan in action, assess the overall effectiveness of the plan, review a subrecipient's policies and procedures and meet key personnel. The grant administrator will contact the subrecipient approximately 30-60 days prior to a proposed site visit with a suggested date, and site visit questionnaire. The program director and financial director should be present. One questionnaire will be sent per open grant award and should be completed and returned to the grant administrator prior to the site visit.

If a monitoring visit has to be cancelled due to inclement weather, illness, or for any other reason, then a new date will be chosen at the earliest time both parties are available to meet. The new date should be chosen promptly, and appropriate staff notified.

The PSGAO will review the performance statistics as part of the site visit, if applicable. The PSGAO will bring the previous quarter's Performance Measurement Tool report to compare with the statistics on file with the subrecipient to ensure the reported data in the PMT is accurate. The grant administrator will examine how subrecipients monitor and track data to ensure that a system exists that is capable of accounting for information measured by the PMT. Data from the subrecipients prior PMT will be reviewed with the project personnel during the site visit to confirm how the data was obtained and to review for accuracy. For example, if visiting a subrecipient whose primary purpose is to address domestic violence, but the PMT showed that few victims of that crime type were assisted during that period, the grant administrator would be able to address the discrepancy – including discussing whether the subrecipient is expending grant funds towards their original allocated purpose, whether a typographical error occurred, and the general efficacy of the program.

After the site visit, a monitoring report will be prepared for the grant file, along with a follow up letter to the subrecipient. The report must identify the issues reviewed for compliance, any findings, any recommendations for corrective action and a deadline for completing the corrective action. The grant administrator will report immediately any major concerns, such as fraud, waste and abuse as well as any potential violations of federal guidelines concerning civil rights as set forth in state and federal statutes to the Administrative Manager.

### PMT and Mandatory Reporting

All reports mandated in the grant regulations and special conditions, including periodic progress reports and quarterly Federal Financial Status Reports (SF-425) will be filed in a timely manner according to the requirements as set forth in the individual grant.



## The State of Rhode Island – Public Safety Grant Administration Office

The PMT (Performance Measurement Tool) is the website that all the VOCA subrecipients must report in for every quarter. The subrecipients are given 15 days to enter their PMT data. This leaves fifteen days that the grant administrator can review and check that the information is submitted. If information is missing, the report will be unlocked so that the subrecipient can add the missing information. The grant administrator makes sure that all of the subrecipients have entered their documentation before the deadline. The PMT documentation is reviewed for accuracy during the site visit using the last available PMT report.

### Suspicion of Fraud, Theft, or other Illegal Activity

Any subrecipient, subrecipient employee, or any individual with knowledge of fraud, theft, or illegal activity should contact the PSGAO immediately and notify the Administrative Manager.

Regardless of monitoring status, if a grant administrator suspects that any grant funds are the subject of fraud, theft, or otherwise used in an illegal manner, the grant administrator shall immediately notify the Administrative Manager.

The Administrative Manager shall review the subgrant file, and if in agreement with the grant administrator, refer the subgrant file to the Executive Officer of the Rhode Island State Police, Department of Public Safety, for investigation. The PSGAO shall notify the OVC that a grant file has been referred for investigation.

### Remedies for Noncompliance

If the PSGAO determines that noncompliance cannot be remedied by imposing additional conditions pursuant to Level II monitoring, the PSGAO may take one or more of the following actions, as appropriate in the circumstances:

- (a) Temporarily withhold cash payments pending correction of the deficiency by the non-federal entity or more severe enforcement action by the federal awarding agency or pass-through entity.
- (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- (c) Wholly or partly suspend or terminate the federal award.
- (d) Initiate suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal awarding agency regulations
- (e) Withhold further federal awards for the project or program.
- (f) Take other remedies that may be legally available.

## RECORD KEEPING AND FILE MANAGEMENT

Both the PSGAO and the subrecipients must maintain a grant file for each grant. This may be physical or digital as stated in an agencies policies and procedures and should include:

- Application and Award Contract
- Signed Special conditions
- Correspondence
- Grant Adjustment Notices
- Supporting Documentation for Grant and Match Personnel
- Quarterly PMT Reports
- Match Documentation
- Progress reports
- Reimbursement Requests and Supporting Documentation
- Equipment Inventory List, if applicable
- Volunteer List and Activity Log (if used as in-kind match)
- EEOC certifications
- Notices of Noncompliance
- Corrective Action Plans

## VICTIMS OF CRIME ACT

The purpose of the VOCA Victim Assistance Formula Grant Program is to provide federal financial assistance to states to support the provision of services to victims of crime throughout the nation. The VOCA grant is administered by the Office for Victims of Crime (OVC), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ), which distributes funds to the states by formula. The PSGAO is the State Administering Agency (SAA) for the VOCA grant.

A “crime victim” is defined as “a person who has suffered physical, sexual, financial or emotional harm as a result of the commission of a crime.” Services are defined as those efforts that:

1. Respond to the emotional and physical needs of crime victims;
2. Assist primary and secondary victims of crime to stabilize their lives after victimization;
3. Assist victims of crime to understand and participate in the criminal justice system;  
and
4. Provide victims of crime with a measure of safety and security.

### VOCA Advisory Committee and Project Selection

Originally established in 1986, the VOCA Advisory Committee consists of volunteer representatives from both the public and private sectors. The Committee meets throughout the year and works with the PSGAO to identify the needs of victims of crime, set goals for distribution of federal dollars, establish procedures for applicants to submit grant requests, and make recommendations for the funding of grant programs.

The PSGAO does not make decisions on which projects receive funding. The VOCA Advisory Committee reviews and rates project proposals facilitated by the PSGAO. For projects seeking a continuation of funding, the efficacy of the past program will be evaluated. Final funding decisions are made by the VOCA Advisory Committee and approved by the Criminal Justice Policy Board.

Applicants are encouraged to consider including how to connect their services to those victim populations who may have previously been underserved or unserved. Examples include: children victimized by the opioid crisis, individuals with disabilities, the homeless, victims who are LGBTQ, victims of financial exploitation, male survivors of sexual abuse, the elderly, people with limited English proficiency, and non-citizens.

### Project Period

Continuation funding of existing projects is not guaranteed and subrecipients must reapply for funding. Projects selected for funding will be awarded for a period of performance of one year or two years. New projects will only be funded for one-year, and continuing projects are not guaranteed two years of funding. The award period usually begins October and runs to the following September 30.

### Applicable Federal Regulations

The Federal regulations governing VOCA are located in various sources (Links in Appendix A):

- Federal grants, including VOCA, are governed generally under Grants and Agreements, 28 C.F.R. § 200 and more specifically in 28 C.F.R. § 94 subpart B.
- The Department of Justice, Office of Justice Programs, Office for Victims of Crime has promulgated VOCA specific final guidelines with in-depth rules concerning the programmatic aspects of the VOCA grant.
- The Department of Justice Grants Financial Guide serves as a compilation of the various laws and regulations governing DOJ grants financial management and administration. The Guide is the starting point for all recipients and subrecipients of DOJ grants and cooperative agreements in ensuring the effective day-to-day management of awards.

## The State of Rhode Island – Public Safety Grant Administration Office

- Additionally, each subrecipient may be subject to unique terms and conditions that are contained in the individual grant award.

### Performance Measurement Tool

The OVC uses a data collection system called the Performance Measurement Tool (PMT) to collect statistical data relevant to the grant as one means to assess the overall success of a grant program and track how a grant is progressing towards the goals outlined in the application. Subrecipients will need to track and input the data requested by OVC in order to be reimbursed.

### ELIGIBLE APPLICANTS

The PSGAO is required to ensure that the following conditions or requirements are met:

a. Subrecipient shall be operated by a public agency or a non-profit organization and provide direct services to crime victims. A non-profit applicant shall certify that it is a non-profit organization eligible to receive federal funds.

b. Subrecipient shall 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 non-federal sources.

c. Subrecipient shall demonstrate that it is capable of providing matching contributions of 20 percent (20%) – cash or in-kind – of the total cost of each VOCA project, i.e., VOCA grant plus match, from non-federal sources. All funds designated as match funds are restricted to the same uses as the VOCA grant funds and shall be expended within the grant period. The basis for determining match funds must be documented.

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 professional and technical personnel and other skilled and unskilled labor, if the services they provide are an integral and necessary part of a funded project. The value placed on loaned or donated equipment may not exceed its fair rental value. The value placed on donated services must be consistent with the rate of compensation paid for similar work in the organization or the labor market. Fringe benefits may be included in the valuation. Volunteer services must be documented and, to the extent feasible, supported by the same methods used by subrecipient for its own employees. 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 a privately owned building in the same locality. The basis for determining the value of personal services, materials, equipment, and space must be documented. Matching funds are subject to the same conditions as the federal funds.

d. Subrecipient shall use volunteers unless the PSGAO determines there is a compelling reason to waive this requirement. A “compelling reason” is defined by the VOCA Guidelines to

**The State of Rhode Island – Public Safety Grant Administration Office**

be: “1) a statutory or contractual provision concerning liability or confidentiality of counselor/victim information, which bars the use of volunteers for certain positions; or 2) the inability to recruit and maintain volunteers after a sustained and aggressive recruitment effort.” Request for waivers shall be in writing to PSGAO and supported by appropriate documentation.

e. Subrecipient shall assist victims in applying for victim compensation benefits. Such assistance may include identifying and notifying crime victims of the availability of compensation, assisting them with application forms and procedures, obtaining necessary documentation, and/or checking on claim status.

f. Subrecipient shall comply with the applicable provisions of VOCA, the applicable Program Guidelines and Rules, and the requirements of the most current edition of the Department of Justice Grants Financial Guide, which includes maintaining appropriate programmatic and financial records that fully disclose the amount and disposition of the VOCA funds received. In addition, the Subrecipient shall develop and maintain fiscal, statistical, and administrative records pertaining to the services as specified by the Department of Justice

g. Subrecipient shall comply with the non-discrimination laws and shall, within the timetable established by the PSGAO, maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age, and disability. In addition, the Subrecipient shall permit reasonable access to books, documents, papers, and records to determine whether the applicant is complying with applicable civil rights laws. This requirement is waived when providing a service where soliciting the information may be inappropriate or offensive to the crime victim.

h. Subrecipient shall provide services to victims of federal crimes on the same basis as victims of state/local crimes.

i. Subrecipient shall provide services to crime victims at no charge through the VOCA-funded project. Any deviation from this provision requires prior approval from the Department of Justice.

j. Subrecipient shall provide services to crime victims regardless of the victims’ participation in the criminal justice process.

k. Subrecipient shall maintain the confidentiality of client-counselor information as required by state and federal law.

l. Subrecipient shall maintain the confidentiality of research information. Recipients of VOCA monies shall not use or reveal any research or statistical information furnished under VOCA by any person, and shall not use or reveal any research or statistical information identifiable to any specific private person for any purpose other than the purpose for which information was obtained. It should be noted 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. Further, this confidentiality provision should not be interpreted to thwart the legitimate informational needs of public agencies.

m. Subrecipient shall abide by any additional eligibility or service criteria as established by the PSGAO.

n. As a requirement to receiving the VOCA funds, subrecipient must be registered with the System for Award Management (SAM) and maintain active status throughout the duration of the project period. Subrecipient must also have a valid Data Universal Numbering System (DUNS) number.

o. Subrecipient shall promote Community Efforts to Aid Crime Victims. Promote, within the community, coordinated public and private efforts to aid crime victims. Coordination may include, but is not limited to, serving on state, federal, local, or Native American task forces, commissions, working groups, coalitions, and/or multi-disciplinary teams. Coordination efforts also include developing written agreements that contribute to better and more comprehensive services to crime victims. Coordination efforts qualify an organization to receive VOCA victim assistance funds but are not activities that can be supported with VOCA funds.

### **New Applicants**

Those programs that have not yet demonstrated a record of providing services may be eligible to receive VOCA funding, if they can demonstrate that 25-50 percent of their financial support comes from non-federal sources. It is important that organizations have a variety of funding sources besides federal funding to ensure their financial stability. The VOCA Advisory Committee will establish the base level of nonfederal support required within the 25-50 percent range for new programs.

New applicants are encouraged to include fiscal policies, their most recent annual report, confidentiality policies, non-discrimination policies, and any other information that may assist the VOCA Advisory Committee in evaluating their organization.

### **Allowable Costs**

The following is a list of services, activities, and costs that are allowable and eligible for support with VOCA grant funds under the VOCA Guidelines:

#### **a. Immediate Health and Safety**

Services which respond to the immediate emotional and physical needs (excluding medical care) of crime victims such as crisis intervention; accompaniment to hospitals for medical examinations; hotline counseling; emergency food, clothing, transportation and shelter (including emergency, short-term nursing home shelter for elder abuse victims for whom no other safer, short-term residence is available); and other emergency services that are intended

to restore the victim's sense of security. Also allowable under this category is emergency legal assistance such as filing restraining orders and obtaining emergency custody/visitation rights, boarding-up broken windows and/or replacing locks.

b. Mental Health Assistance

Services that assist the primary and secondary victims of crime in understanding the dynamics of victimization and in stabilizing their lives after victimization such as counseling, group treatment, and therapy.

c. Assistance with Participation in Criminal Justice Proceedings

Services may include advocacy on behalf of crime victims; accompaniment to criminal justice offices and court; transportation to court; child care or respite care to enable a victim to attend court; notification of victims regarding trial dates, case disposition information, and parole consideration procedures; and assistance with victim statements.

d. Forensic Examinations

For sexual assault victims, forensic exams are allowable costs only to the extent that other funding sources are unavailable or insufficient, and such exams conform to state evidentiary collection requirements.

e. Costs Necessary and Essential to Providing Direct Services

Pro-rated costs of rent, telephone services, 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 are allowable.

f. Special Services

Services to assist crime victims with managing practical problems created by the victimization such as acting on behalf of the victim to other service providers, creditors, or employers; assisting the victim to recover property that is retained as evidence; assisting in filing for compensation benefits; and helping to apply for public assistance.

g. Relocation Expenses

VOCA grant funds can support relocation expenses for crime victims, such as emergency shelter, moving expenses; security deposits on housing and rental costs under certain circumstances which are reviewed and approved by the PSGAO.

h. Personnel Costs

Costs directly related to providing direct services, such as staff salaries and fringe benefits, including malpractice insurance; the cost of advertising to recruit VOCA-funded personnel; and the costs of training paid and volunteer staff.

i. Restorative Justice

Opportunities for crime victims to meet with perpetrators, if such meetings are requested or voluntarily agreed to by the victim and have possible beneficial or therapeutic value to crime victims.

j. Services for Incarcerated Victims

The costs permitted for direct services to incarcerated victims are the same as those permitted for such services to any crime victim. Nothing in VOCA allows funding to be diverted to “prison purposes;” rather, VOCA funding is expressly limited by statute to victim services and associated activities.

**Unallowable Costs**

The following is a non-exhaustive list of services, activities, and costs that are not supported with VOCA funds:

a. Lobbying and Administrative Advocacy

VOCA grant funds cannot support victim legislation or administrative reform, whether conducted directly or indirectly.

b. Prosecution Activities

VOCA grant funds cannot be used to pay for activities that are directed at prosecuting an offender and/or improving the criminal justice system’s effectiveness and efficiency, such as witness notification and management activities and expert testimony at trial. In addition, victim witness protection costs and subsequent lodging and meal expenses are considered part of the criminal justice agency’s responsibility and cannot be supported with VOCA grant funds.

d. Property Loss

VOCA grant funds cannot be used to reimburse crime victims for expenses incurred as a result of a crime (e.g., insurance deductibles, replacement of stolen property, funeral expenses, lost wages, and most medical costs).

e. Most Medical Costs

VOCA grant funds cannot pay for nursing home care, home healthcare costs, inpatient treatment costs, hospital care, and other types of emergency and nonemergency medical and/or dental treatment. VOCA grant funds cannot support medical costs resulting from victimization, except for forensic medical examinations for sexual assault victims. (For sexual assault victims, forensic exams are allowable only to the extent that other funding sources are unavailable or insufficient, and such exams conform to state evidentiary collection requirements.)



**The State of Rhode Island – Public Safety Grant Administration Office**

- f. Development of Protocols, Interagency Agreements, and Other Working Agreements
- g. Costs of Sending Individual Crime Victims to Conferences

Food

The purchase of food is typically not allowable under VOCA. Emergency food – for the purpose of helping a victim of crime, however, is allowable. Reimbursement requests for emergency food must include a brief narrative describing the nature of the emergency and reasonableness of the expense. Food cannot be purchased for agency staff or meetings.

This manual is authorized and effective upon signature of the Administrative Manager of the Public Safety Grant Administration Office:

\_\_\_\_\_  
Michael Hogan, Administrative Manager

\_\_\_\_\_  
Date

## APPENDIX A: USEFUL LINKS

Department of Justice Grants Financial Guide:

<https://ojp.gov/financialguide/doj/GeneralInformation/index.htm>

In PDF form:

[https://ojp.gov/financialguide/doj/pdfs/DOJ\\_FinancialGuide.pdf](https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf)

DOJ Financial Guide Food Policy (Please review financial guide first)

<https://ojp.gov/financialguide/DOJ/pdfs/foodandbeverage.pdf>

Grants and Agreements, 2 CFR 200:

[https://ecfr.io/Title-02/cfr200\\_main](https://ecfr.io/Title-02/cfr200_main)

28 C.F.R. 94:

<https://www.law.cornell.edu/cfr/text/28/part-94/subpart-B>

VOCA FAQ's

<https://www.ovc.gov/VOCA-Administrators/VOCA-Rule-FAQs-508.pdf>

PSGAO:

<http://psga.ri.gov/>

PSGAO Statutory Authorization:

<http://webserver.rilin.state.ri.us/Statutes/TITLE42/42-26/INDEX.HTM>

Department of Public Safety Access to Public Records Policy:

[http://dps.ri.gov/documents/APRA/270-RICR-40-00-1- SOS\\_Clean\\_Copy.pdf](http://dps.ri.gov/documents/APRA/270-RICR-40-00-1- SOS_Clean_Copy.pdf)

OJP Civil Rights Training:

<https://ojp.gov/about/ocr/ocr-training-videos/video-ocr-training.htm>

**The State of Rhode Island – Public Safety Grant Administration Office**

EEOP Tool:

<https://ojp.gov/about/ocr/eeop.htm>

APPENDIX B: AWARD CREATION CHECKLIST

Grant \_\_\_\_\_

Subrecipient \_\_\_\_\_

To be checked by grant manager after the creation of a new award. Reimbursements will not be issued until this list is reviewed by the Administrative Manager. If not applicable, please write N/A next to the item.

- Signed subgrant application
- SAM Registration Verification
- Pre-Award Risk Assessment completed
- Initial budget reviewed for allowable/unallowable expenses and approved
- Signed PSGAO award document
- PSGAO Subgrant Award Statement/Special Conditions
- PSGAO General Subgrant Conditions & Assurances
- Federal Award Special Conditions
- Certification Regarding: Lobbying; Debarment, Suspension and Other Responsibility Matters; and Drug-Free Workplace
- FFATA Complete, \_\_\_\_\_ date filed
- EEOP Certificate
- CRCQ Questionnaire
- Reviewed for Federal Special Conditions. By checking this box, the grant manager assures that they have reviewed the Federal Special Conditions and taken appropriate action, if required.
- Reviewed for Federal holds. By checking this box, the grant manager assures that they have reviewed the file for any Federal holds on funds. Appropriate action has been taken, if required, including contacting Federal program managers in the event of any ambiguity.
- Grant Manager time sheet updated
- Other: \_\_\_\_\_

\_\_\_\_\_  
Grant Manager

\_\_\_\_\_  
Administrative Manager