Division of
Justice &
Community
Services

Subgrantee Reference Handbook

Revised 5/1/12

Preface

The intent of this document is to serve as a reference tool for the Division of Justice and Community Services (DJCS) subgrantees. Enclosed are standard policies and/or procedures utilized by DJCS. While most areas discussed in this reference book apply to all of the grant programs administered by the Division, there may be a few exceptions. This document is NOT meant to replace contact with the program specialist.

Request For Proposal (RFP) Process

Grant programs that have an open solicitation release an annual Request for Proposal (RFP). In most cases the RFP is a paper brochure with information for the grant program, eligible applicants, allowable expenses and a deadline for the application as well as instruction on how to access an application kit. In addition to the paper RFP, the application kit is also posted on the WV DJCS website on the Current Funding Opportunities page. http://www.djcs.wv.gov/

Grant Program Committees and Grant Review

Most grant programs administered by the Division are required to or the Division chooses to utilize a grant oversight committee. The level of oversight and name of each committee varies from one program to another with the common thread being that grant applications are reviewed by these committees and funding recommendations are made to the Governor's Office for final review and award. For more information on a specific oversight committee, please see the administrative manual for the respective program.

Once the application deadline has passed a grant review is held where each application is reviewed by the oversight committee along with Division staff.

Division of Justice & Community Services (DJCS) Terms

- Program Specialist-DJCS employee that administers the subgrant.

- Accountant-DJCS employee that is the second tier of the reimbursement process and requests payment from the Auditor's office.

- Request for Proposal (RFP)-Announcement of available grant funds for a particular program. This may be in paper or e-mail format as well as listed on the DJCS website.

- Open Solicitation-The allowance for agencies, that were not subgrantees the previous funding year, to make application for grant funds.

- Closed Solicitation-Not allowing agencies that were not subgrantees the previous year to apply for funding.

- Application Kit-The application that is required to apply for grant funds.

- Match-Local funds or in-kind goods/services that are used to enhance subgrantee funds. The percentage of match is based upon the grant program and will be announced in the Request for Proposal and grant application instructions. Federal funds may not be matched with Federal funds.

- Grant Oversight Committee-Group of individuals tasked with reviewing the subgrant applications at grant review.

- Grant Review-The meeting at which the subgrantee applications are discussed and reviewed. The subgrantee may be required to attend or be available via telephone to answer questions related to the applications. Appropriate notice will be given to applicants.

- Grant Contract-The document that affects the "relationship" between DJCS and the subgrantee. This document is signed by the Director of DJCS and the subgrant Authorized Official.

- Project Number-Unique number assigned by DJCS that is specific to the subgrant. This number can be found on the contract. This number will be on each report submitted to DJCS.

- Deobligation-The act of "removing" grant funds from a subgrantee either for non-compliance of the contract/special conditions or unexpended funds at the end of the grant period.

- Grant Adjustment Notice (GAN)-A DJCS document that is completed at the request of a subgrantee when anything from the original grant application changes such as a budget adjustment, expenditure approval, grant period extension, change in grant officials, etc.

- Change Orders-A DJCS document that is completed in conjunction with certain Grant Adjustment Notices. Subgrantees never see a Change Order.

- Monthly Reports-Financial and Progress Reports related to the subgrant that are due the 20th day of the following month to DJCS.

- Subgrantee-Applicant agency that has been awarded grant funds by DJCS.

- Administrative Manual-Program guidelines that are specific to each grant program.

- State Fiscal Year-July 1 through June 30

- Federal Fiscal Year-October 1 through September 30

Applications

As the applications are received, page one of the application will be date stamped by DJCS. Late, faxed, e-mailed or post marked applications will not be accepted. The Program Specialist will review the application for completeness and accuracy.

All three grant officers (Project Director, Fiscal Officer and Authorized Official) are different individuals.

The Authorized Official (AO) must be the agency head responsible for the grantee agency and authorized to enter into contract for the grant in question. The Authorized Official should be the agency director, board director, mayor or county commissioner, whichever is applicable.

The Project Director (PD) should be the individual responsible for the administration of the grant program. This is the first point of contact for general questions or problems regarding the grant in question.

The Fiscal Officer (FO) should be the individual responsible for the financial administration of the grant program. This is the point of contact for issues regarding grant expenditures and documentation for the grant in question.

a. The application checklist should be followed very closely to avoid incomplete applications.
b. Beginning July 1, 2012, budget narratives are required to be very specific. Each grant funded position must be designated as full-time, part-time, or overtime. Each position is required to have benefit rates associated with each position if benefits are being requested to be paid by grant funds. Please refer to the detailed example budget narrative that was included in each grant application packet.
c. Written correspondence, fax or e-mail will be sent to the Project Director regarding any missing, incorrect, and/or unclear documentation.
    i. An additional 5 to 10 working days will be given to applicants to correct or complete the submitted application.
    ii. The written correspondence sent to the PD, will give a due date. This due date will be strictly enforced.
    iii. If an applicant has expressed difficulty meeting the deadline, the Specialist has the discretion to give an extension to the due date if the applicant is in contact with the specialist.
    iv. However, if the required documentation is not returned, then the application must be reported to the subcommittee as being "incomplete".

Start of New Grant Cycle

Grant Award Process

If funded, the Authorized Official will receive an award letter from the Office of the Governor. This may be done during an awards ceremony where the subgrantee will be invited to accept the award letter in person or simply mailed. The awards ceremony time and location may vary from year to year and is subject to the discretion of the Office of the Governor.

Shortly following the release of the Governor's award letter a grant contract and related documents will be sent to the Authorized Official named on the grant with the Project Director being copied on that correspondence. The contract and other documents must be signed by the Authorized Official with the original document returned to the Division to be affected. Once all documents are finalized the Program Specialist will send a copy of the approved grant. This correspondence will include the grant application, approved budget and signed contract and other related documents. At a minimum, the project director and fiscal officer should each maintain a copy of the approved grant.

1. Any subgrantee that has not completed/returned all application and contract requirements within 30 days of the start of the grant, will be contacted in writing and be given a strict deadline (5 working days) to have them complete. After the deadline, the Program Specialist has the discretion to deobligate funds after a discussion with the immediate supervisor and the deputy director.

2. Any subgrantee that is not in full operation within 60 days of the start of the grant period must notify DJCS in writing of the following:
   - A valid explanation of the delay in implementation
   - A detailed plan of action to address the delay
   - A date the project is planned to begin

3. Any subgrantee that is not in full operation within 90 days of the start of the grant period must submit a **second** written notification DJCS. At that time, following a discussion with the Immediate Supervisor and the Deputy Director, the Program Specialist has the discretion to deobligate all funds and close the grant.
   - A valid explanation as to why the plan of action failed and the implementation deadline was not met must be submitted.

Monthly Reports
Due to DJCS by 20th of the following month

Grant programs are required to submit several program reports (monthly, quarterly, semi-annual and annual reporting depending upon the grant program) throughout the grant period. For information on a specific grant program's reporting requirements please reference the respective administrative manual and/or program guidelines.

All subgrantees are required to submit monthly reports by the 20th day of the following month of activity. Each should be submitted monthly regardless of the level of activity.

General Guidelines:

- All Monthly Reports will be processed by specialists within **5-7 working days** of date (received) stamped and by the accounting staff within **10 working days**. PLEASE NOTE, due to circumstances beyond the control of the Division this timeframe cannot always be met.

- The Financial and Project Reports should be submitted in one package.

- Reports not received in a timely manner:
  1. Program Specialists will contact the Project Director via e-mail or fax to make them aware that the report is past due. Outstanding reports(s) are to be submitted by a due date of no more than 5 working days.
  2. If reports have not been submitted after the revised due date, a letter will be sent to the Authorized Official (c: Project Director) referring to Special Conditions and Assurances (reporting requirements) of applicable grant. The letter will indicate funds may be deobligated and the grant file closed. A copy of the letter will be placed in the grant file.
  3. If no response – funds **may** be deobligated and grant file closed after a discussion with the Immediate Supervisor and Deputy Director.

- Incomplete reports:
  1. The subgrantee (contact listed on the Project Financial Report or the Monthly Progress Report, whichever is appropriate) will be notified immediately by written correspondence (via email or fax) with a due date of no more than 5 working days.
  2. If no response is received within 5 working days of first written notification, a "Final Notice" informing subgrantee Authorized Official (c: Project Director) they have 3 additional working days to rectify problem and then DJCS will (i.e. mark off or deobligate).
  3. If documentation is not received by the final due date, then the missing information will be marked off of the Request for Reimbursement. If the missing documentation is a Progress Report or Statistical Report, then the

Program Specialist cannot process the report and has the option to deobligate funds after a discussion with the Immediate Supervisor and Deputy Director.

Monthly Progress Reports:

- Reports must have all required contact information completed.
- Report must list a brief summary of activities as they relate to the goals, status of objectives and any other relevant activities of the applicable grant.
- A monthly Statistical Report must also be sent with Progress Report if applicable.
- Copies of all Board Meeting Minutes (including county commission, Board of Directors, etc.) must also be sent with monthly progress report if applicable, unless the progress report indicates there was not a meeting for the reporting month.
- **The monthly progress report is required to process financial requests**.

Financial Reports:

- To process a financial report, the corresponding progress report must be on file.
- **Financial Requests must follow the approved budget** unless a Grant Adjustment Notice (GAN) has been requested and approved.
- Steps to process:

1. **Request for Reimbursement** page must be signed by either the Authorized Official or Fiscal Officer as listed on Page 1 of the Grant Application or any changes made through adjustments. This must be an original signature; ***NO COPIES OR STAMPED SIGNATURES WILL BE ACCEPTED.***
   - Subgrantee information must be the same as on the processed grant. Please note that the address on the Request for Reimbursement must match the address on the approved grant application. All reimbursement checks will be mailed to this address.
   - Project number – the number DJCS has assigned
   - FEIN # - can be found on the Budget Pages in the application
   - Period the report covers – typically should only be for one month timeframe
   - Total amount requested – will verify total at the end.
   - DJCS will not process Request for Reimbursements that are less than $100. If a request is sent in totaling less than $100, the request will be held until the following month.

2. **Project Financial Report**
   - Top section should be completed by subgrantee. The contact person listed on this page must be the person who actually completed the financial report.

- Approved Budget Columns – should match the approved grant budget. Budget amounts can only be adjusted through a written or e-mailed request and a written grant adjustment completed by DJCS.
- Expended This Period Column – Total amount the subgrantee is seeking for reimbursement this reporting period.
- Expended to Date Columns – running total calculated by the grantee as to what has been expended during the grant cycle.

3. **Recap Page (REQUIRED)**
   - Shows in detail what is being requested for reimbursement.
   - Subgrantee is <u>not</u> required to use the standard DJCS Recap page, however the subgrantee Recap page must be similar and must contain **<u>all</u>** information encompassed in DJCS page.

4. **If payroll / contractual expenses are requested:**
   - All expenses must match approved budget.
   - Effective July 1, 2012, ALL subgrantees must utilize the standard DJCS timesheet.
   - A timesheet must be submitted for each grant funded employee and signed by the employee and their supervisor each month. Original signatures are not necessary. A timesheet will be submitted with the **<u>ENTIRE</u>** month's hours.
   - Proof of payment must be attached for timeframe the subgrantee is requesting payment – proof of payment includes either copies of the check stubs or a copy of the payroll register. If actual checks are attached to the check stubs, they must have ALL appropriate signatures. If a payroll register is submitted, at minimum, these must include the employee's name, check date, check number, and benefits taken out (if applicable).
   - The information on the Recap Page must match the pay stubs.
   - EXAMPLE of what is required by a subgrantee: **<u>Month of July:</u>** Timesheet with all hours worked by the grant funded employee in the month of July (1-31). This particular subgrantee gets paid every other Friday so they will attach paystubs for July 1, 15, & 29. The Recap Sheet will request payment for the period July 1st through July 29th as this is the period the paystubs cover. **<u>Month of August:</u>** Submit again the entire month of July timesheet (note 29 days were previously requested) and the entire month of August (1-31). The subgrantee will also submit paystubs for August 12th and 26th. The August 12th paystub will cover July 30-August 12 period, and the August 26th paystub will cover August 13-August 26. The Recap Sheet will request payment from July 30th through August 26th. NOTE: It is still acceptable to request the entire month of reimbursement as opposed to the above scenario.

- Please note that effective January 1, 2011, FICA will be reimbursed at the employee's portion. This change is a result of the Tax Relief, Unemployment Insurance Reauthorization, and Job Creation Act of 2010. If the subgrantee wishes to have the employer portion reimbursed that subgrantee must provide, along with the recap sheet, timesheet and pay stubs, a ledger (QuickBooks, etc.) indicating the employer portion. If the ledger only indicates a lump sum paid by the agency then the subgrantee must breakdown each employees share on that ledger. DJCS **will not** accept a ledger that has the amount as a lump sum.
- Effective July 1, 2012, DJCS would recommend that Workers Compensation and Unemployment be requested monthly, however no less then quarterly, based on the percentage set in the approved budget.
- Effective July 1, 2012, proof of Health Insurance premiums paid for each requested employee must be provided.

5. **If Travel / Training expenses are requested:**
   - Must match approved budget.
   - A travel voucher/expense sheet must be submitted. Employee signature and supervisor signature is required.
   - Proof of payment must be attached - typically a copy of the check showing payment. If charges were placed on an agency/business credit card, a copy of the credit card bill and a copy of the check showing the card was paid. If the expense was charged on a personal credit card, the credit card statement is NOT needed. This is the actual statement mailed to the card holder. Proof of payment is required, this may be a copy of the check "cut" to the individual from the grantee agency.
   - Meal Allowances – must follow State guidelines and comply with Federal Per Diem rates. Receipts are not required.
   - Federal Regulations regarding allowable food for training has changed. ANY food expenditure for ANY training must be pre-approved through the Feds. State programs are exempt.
   - Lodging, car rental, fuel receipts, must have receipt/voucher and proof of payment and must be consistent with State travel guidelines.
   - To be reimbursed for attendance at training events – the training must be pre-approved in the budget or through a written grant adjustment.
   - Use of agency debit cards require a bank statement for payment.
   - If the subgrantee is a State agency and utilizes a purchasing card (P-Card) the subgrantee should contact the Specialist/Accountant for instructions on reimbursement.

6. **If Other/Equipment/Supplies are requested:**
   - Must match approved budget.
   - Receipts showing items purchased must be submitted – copies are acceptable. Purchase orders or packing slips are **not** acceptable.
   - If charges were placed on an agency/business credit card, a copy of the credit card bill and a copy of the check showing the card was paid. If the expense was charged on a personal credit card, the credit card statement is NOT needed. This is the actual statement mailed to the card holder. Proof of payment is required, this may be a copy of the check "cut" to the individual from the grantee agency.
   - Proof of payment must be attached – usually a copy of the check showing payment.
   - If a computer, office equipment, vehicle, etc. is purchased by the grant, then an Equipment Listing Form must be attached.
   - Use of agency debit cards require a bank statement for payment.
   - If the subgrantee is a State agency and utilizes a purchasing card (P-Card) the subgrantee should contact the Specialist/Accountant for instructions on reimbursement.

- If something is requested for reimbursement that is not approved in the original budget or in a written grant adjustment, then the requested item(s) and amount(s) will be marked off. Accountants will check with the Program Specialist prior to marking off any requested expense. Subgrantee will be contacted as to why this expense was not allowable.
- Totals from **Recap page** must match the amount listed in the Expended This Period Column of the **Project Financial Report**. If different, appropriate corrections will be made and the subgrantee will be notified.
- Total from **Project Financial Report** (Expended This Period Column) should match amount listed on **Request for Reimbursement** form. *Important note* – the Request for Reimbursement Form total only includes funds being requested through the grant. Match calculations are not included on this form. Match should be monitored and noted on the Project Financial Report.
- If match is applicable to the program, match will be monitored on a monthly basis, but no less than on a quarterly basis. If a subgrantee is not up-to-date with their match, a letter will be sent to the Project Director (c: Fiscal Officer) and inform them that no future Request for Reimbursements will be processed until the match is current.
- If any changes are made to the totals on the **Project Financial Report** once processed by the Accountants, a corrected form will be faxed or e-mailed to the subgrantee for their records.
- Match documentation must be submitted in the same manner as reimbursable expenses. Match must be documented on the Monthly Project Financial Report Form and must have proper backup documentation. Match may differ based upon the grant program. For Federal programs that do not allow food to be

purchased with grant funds, the subgrantee MAY utilize these expenses as match.

- DJCS does not use QuickBooks so all calculations are done on a calculator. It is standard DJCS practice that the accounting staff will check the requested amount. If there is a difference of only a few pennies, and it is NOT an addition issue that has already been identified, the accountant will always carry out the decimal point at least three places.
- Grant funds (if allowable under individual grant Federal guidelines) and depending upon availability of funds within the subgrant, may be used to pay an annual leave balance to a subgrant funded employee when employment is terminated during the subgrant period. Reimbursement is proportionate based upon the time funded under the grant. If the employee has 240 hours of annual leave, however only 150 hours were accrued during the time the employee was employed by the grant, then that is the grant can reimburse 150 hours.
- Grant funds do not pay bonuses or increment payments.
- Supplanting-To deliberately reduce state or local funds because of the existence of federal funds. In order to prevent supplanting the subgrantee will have to backfill. Backfill is simply the process of hiring an additional individual to prevent replacing the local or state funds with federal funds. Example 1: Applicant requests funding for a "new" position that has NO local or state funds budgeted for that "type" of position. Victim Advocate in Prosecutor's Office=NOT SUPPLANTING Example 2: Applicant requests funding for a new position that it does have local or state funds already budgeted for that "type" of position. City of County requesting funds for another officer=MUST BACKFILL Subgrantee will be notified at the time of application whether or not the requested position will need to be backfilled if the grant is funded.
- Specific, NOT ALL, grant programs administered by DJCS allow <u>only</u> units of government to apply for these funds. Due to this regulation, private and/or non-profit organizations wishing to implement a project utilizing these funds must develop a relationship with a unit of local or state government. This unit of government would then apply on behalf of the private and/or non-profit organization, who would actually implement the project. Please note that the unit of government does not have to use funds from their budget, but can accept the private and/or non-profit organization's invoices and checks as backup documentation. This documentation must be submitted by the unit of government (subgrantee). Reimbursement will be made back to the unit of government (subgrantee).
- All subgrants will be monitored for grant compliance. No changes will be approved/disapproved by the monitor.
- Any corporation, association, or other organization in West Virginia that is not a local government which received funds from the WV Division of Justice and Community Services in the amount of $15,000 or more shall file an audit of the disbursement of funds with the WV Legislative Auditor's Office. This audit shall be filed within two years of the disbursement of funds by the Division to the entity and shall be made by an independent, certified public accountant at the cost of the entity and show that the funds were spent for the purposes intended. An

entity failing to file a required audit within the two-year time period is barred from subsequently receiving funds from the State until the entity has filed the audit and is otherwise in compliance with Chapter 12, Article 4, Section 14 of the West Virginia Code, as amended.

Grant Adjustments and Change Orders

Grant Adjustments are completed after submission of a written request, e-mail, or fax by the Grant Project Director (or the Program Director or Fiscal Officer after consultation with Grant Project Director). The adjustment request must be clear, detailed, and must be allowable under all State, Federal and DJCS funding guidelines.

All adjustments (financial or programmatic) to the initial approved grant application MUST have the Program Specialist's written approval prior to any modifications by subgrantee or the submission of the monthly reports by subgrantee.

1. A written response must be generated within 5 working days of receipt of the written request.

2. If the requested change is not allowable under grant conditions, then a written response letter must be sent to the Project Director detailing the reason for the denial of the grant adjustment request.

3. In the event a request may be allowable, but the Program Specialist has not received appropriate proof of justification or proper documentation, the subgrantee must be sent written notification of documentation needed to process the request. This notification must be sent within the 5 working days of receiving the request and must be attached to the initial request.

Grant Closing Procedures

1. When the final (typically June) financial reports are submitted, the Program Specialist must review the reports carefully to make sure the match requirement is up to date if applicable. If match has not been submitted, then notice must be sent immediately giving the subgrantee a 3-5 working day deadline to submit the match. **If match is not submitted at that time then the June request will be used as match instead of reimbursed.**

2. Most of the June reports will be marked as Final Report (top of the Project Financial Report Forms). If not marked, the program specialist must call the subgrantee to confirm they will not have a supplemental request. If the program specialist approves a supplemental request the program specialist must mark the Request for Reimbursement as "supplemental". A supplemental request does not require an extension.