



**IOWA DEPARTMENT OF JUSTICE**

**ATTORNEY GENERAL  
BRENNA BIRD**

## Chapter 2 Post Award Requirements

### Awarding Contracts

[Administrative Rules 61-9.60(13) (1-7)]

Each applicant designated to receive funding will receive a contract specifying the terms and conditions of receiving victim services funding, including the CFDA or assistance listing number and the federal award number for each funding stream awarded.

Victim Assistance issues contracts only after the Crime Victim Assistance (CVA) Board has made their funding decisions and the timeline for requests for reconsideration (appeals) has lapsed. Attorney General staff or the CVA Board may require modifications of the proposed project, submission of additional information or documents, or other contract stipulations. The required modification, information, document, or stipulation shall be specified in the notification of grant award.

Award contracts are normally dispersed prior to the start date of the project period.

# Subaward Agreements

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## Contract Period

Subrecipient subawards (contracts) are issued annually for every year of the three-year grant award period.

The majority of contracts are issued for a 12-month period beginning October 1<sup>st</sup> and ending September 30<sup>th</sup> of the following year. The subaward will include the amount of funds awarded for that year. During any multi-year award cycle, subawards are issued annually.

Subrecipients must remain in compliance with state and federal rules and in good standing with the Victim Services Support Program (VSS) requirements and procedures to receive funding in the second and third years of the grant cycle. The amount of funding awarded to subrecipients in the second and third year of the grant cycle will be based on the availability of State and Federal funds.

Subrecipients will not be allowed to carry over or extend prior awards into the next fiscal year unless approved by Victim Assistance and allowed by the federal funder. Any unspent funds at the end of the contract period will be returned.

## Signing Contracts

Both parties must sign the subaward (contract) before expenses can be reimbursed.

The subrecipient's authorized official electronically signs the contract and submits it via Iowa GVS. The authorized official is the individual designated by your agency to sign contracts. The authorized official could be the executive director, board president, board chair, county supervisor, sheriff, police chief, county attorney, etc.

[To submit a signed contract via Iowa GVS](#), subrecipients must status change the grant from Contract Pending Grantee Signature to Contract Pending CVAD Signature. This will move the grant to Victim Assistance for signature.

A final copy of the executed contract will be uploaded into Iowa GVS on the Grant Agreement Signatures page.

## Termination of a Contract

[Administrative Rule 61-9.62(13)(1-3)]

Contracts may be terminated for the following reasons:

- *Termination by funded program (subrecipient)*. The subrecipient may terminate the contract at any time during the contract period by providing notice to the division.
- *Termination by department*. The department may terminate a contract when the subrecipient or any of its subcontractors fail to comply with the funding award stipulations, standards or conditions. The department may terminate, or reduce a contract when there is a reduction of funds by executive order or otherwise.
- *Termination for cause*. If the subrecipient fails to fulfill its obligations under the contract agreement properly or on time, or otherwise violates any provision of the agreement, the board may terminate

the agreement by written notice to the funded program. The notice shall specify the acts or omissions relied on as cause for termination. All finished or unfinished products and services provided by the funded program shall, at the option of the department, become state property. The department shall pay the funded program fair and equitable compensation for satisfactory performance prior to receipt of notice of termination, minus any funds owing to the department, e.g., damages for breach, improperly spent funds.

The newly terminated program within 45 days of the termination, shall supply the department with a financial statement detailing all costs incurred up to the effective date of the termination. [Administrative Rule 61—9.63(13)].

Subrecipients should review the termination language in their contracts.

Subrecipients shall indemnify, and hold harmless the State of Iowa, its officers, agents and employees and any of the state's federal funding sources for:

1. Program's performance or non-performance of a contract entered into, or violation of these rules.
2. Program's activities with subcontractors and all other third parties, or any other act or omission by a subrecipient, its agents, officers, and employees. [Administrative Rule 61—9.64(13)]

# Program and Fiscal Responsibilities

The expectation for accepting an award from the Attorney General's Office is the subrecipient will have in place a system that is adequate for carrying out the administrative/financial and program aspects of the grant award. This includes good communication between the board of directors (if applicable), administrative/financial staff and the program staff. Management should pay particular attention to the budget and expenditure process of the grant award. Fiscal and program staff are responsible for ensuring that the project is implemented successfully. Therefore, it is important that all staff involved with grants are familiar with both the fiscal and programmatic requirements.

The subrecipient must establish and maintain program records to ensure that the direct and subcontracted project activities are in compliance with the executed contract. Such records must be readily available for review.

1. The subrecipient must establish and maintain fiscal controls and procedures that assure federal and/or state funds available for the grant program are properly disbursed.
2. Funds awarded may be expended only for activities and purposes set forth in the executed contract within the approved grant period. The grant period is the start date and end date of the project. It is provided in the contract.
3. Grant funds must be obligated prior to the end date of the grant period. Obligated funds are those funds for which goods or services have been encumbered prior to the last day of the grant period.

# Required Policies and Procedures

[More policies and procedures, and descriptions are in chapter 5.](#)

The grant recipient must establish and implement policies and procedures that address the following areas:

- **Conflict of interest** (see Chapter I. Conflict of Interest)
- Written **Language Access Plan** (LAP) that outlines the organization's policies and procedures for ensuring victims have access to necessary forms of communication, both written and verbal
- Maintaining a **drug-free workplace**
- Restriction of **lobbying** activities as a recipient of federal funds
- **Sexual harassment** policy with a provision that sexual harassment will not be tolerated
- **Whistleblower** protection for those that report abuse, fraud or abuse
- **Nepotism** with regard to hiring and/or supervising relatives of an employee or non-profit board member
- Maintaining a **workplace free of violence**, threats of violence, harassment, intimidation, and other kinds of disruptive behavior
- On-the-job **seat belt and texting while driving** policies and programs for its employees, contractors, and subrecipients when operating agency-owned, rented, or personally owned vehicles
- Tracking, retention and depreciation of **inventory, equipment, property** purchased with grant funds
- **Confidentiality** and the safeguarding of victim records and other information considered sensitive; maintenance of these records; access to these records; procedure of releasing records with victim's consent; and retention/destruction of records. Organization must also document their procedure if there has been a breach, or release of confidential, personally identifying victim information. Please refer to [Chapter VII. Confidentiality & Informed Consent](#).
- **Grievance** procedure for victims, employees and volunteers
- **Personnel Policy** (See [Chapter V. Policies and Procedures, Personnel Policies and Procedures](#))
- **Volunteer** recruitment, selection, screening; training, confidentiality, work rules, supervision, evaluations, grievance procedures and dismissal
- Governance of **Non-Profit Boards** that is consistent with [Non-Profit Organizations and Board of Director's Responsibilities](#), ([Chapter II Post-Award Requirements](#), Iowa law and those of ICADV, IowaCASA or IOVA.
- **Service Delivery**-policies and procedures that outline the guidelines for the delivery of the wide array of **services** provided to victims and their family members
- **Equal Employment Opportunity Plans - Annually** all organizations receiving Department of Justice funding are required to complete and file either an *EEO Plan and Utilization Report* or file the *Verification of EEOP Reporting Requirement* form using the online EEO Reporting system. For more information on EEOP requirements specific to your organization and to access the reporting tool, go to the [Civil Rights EEOP website](#). Once you have complied with the EEOP requirement, you will need to upload documentation into Iowa GVS. [Here are the instructions.](#)
- **Civil Rights Training Certification**- One person from each grant funded organization (the person who is designated the civil rights liaison or similar) must complete Civil Rights Training each grant cycle. The completed [Civil Rights Training Certification](#) form is to be uploaded into Iowa GVS on the organizational details page in the organizational profile. [This is the link to the training videos.](#)

# Budgets and Claims

Subrecipients are required to submit a program/project budget for each year of their contract, (usually Oct to Sept). This budget is part of the applicant, entered into GVS and approved by Victim Assistance must be approved and entered into Iowa GVS prior to claim submission or reimbursement.

Annually, subrecipients are to upload their entire agency budget in the PROFILE section of Iowa GVS on the organization finance page.

If changes to an approved budget are needed, subrecipients must request a budget revision. Budget revisions are requested by submitting a request in Iowa GVS. Step by step instructions for completing budget revisions are provided [here](#). A subrecipient risks costs not being reimbursed if they alter their budget without prior approval. Budget requests will not be accepted within thirty days of the end of the project period without extenuating circumstances and prior approval.

[Claims for Reimbursement](#)  
[Expense Categories](#)  
[Client Assistance](#)  
[Appeals](#)

## Claims for Reimbursement

[Instructions for submitting claims in GVS](#)  
[Claim Summaries](#)

Victim Services funds are reimbursement awards. This means the subrecipient incurs expenses and provides documentation as required for each expense. They then submit a claim for reimbursement Iowa GVS.

All subrecipients may submit either monthly or quarterly claims for reimbursement. Once a choice has been made, the subrecipient remain consistent through the contract period. When required, documentation for each expenditure claimed for reimbursement or as match, is submitted in Iowa GVS. Claims must be submitted by the last day of the month following the expenditure. For example, July claims are due by August 31.

When required, subrecipients must submit [expense summaries](#) for expenses and match with their claims. Criminal justice programs (law enforcement, prosecution and victim witness coordinators) are not required to use expense summaries unless otherwise directed by Victim Assistance. Review the instructions on submitting claims in Iowa GVS for more information.

Click on Victim Services Expense Summaries to download the expense summaries for victim service programs (Domestic Abuse Comprehensive, Sexual Abuse Comprehensive, Shelter-Based Victim Services, Culturally Specific Programs, VOCA Projects, Statewide Coalitions, Statewide DA/SA Hotline/Chat Line and Homicide/Other Violent Crime programs).

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### Expense Categories:

Each budget and claim for reimbursement form is broken out by types of expenses or expense categories. Below is a list of the expense categories and a detailed chart with examples of the types of items for which an agency can request reimbursement and examples of standard supporting documentation.

- *Payroll for direct services & Payroll for administration, fundraising and prevention*
- *Benefits*
- *Travel for services*

- *In-State Travel & Training*
- *Out of State Travel & Training*
- *Contractual Services*
- *Equipment*
- *Repairs/Maintenance*
- *Rent*
- *Utilities*
- *Communications*
- *Advertising*
- *Supplies*
- *Insurance*
- *Client Assistance*
- *Indirect Costs*

When submitting claims for reimbursement, the subrecipient's assigned financial risk level designation (see [Chapter XXI Subrecipient Monitoring](#)) will determine which expense items will need to include supporting documentation.

All expenses must be allocable, allowable, consistent and reasonable. Victim Assistance has the right to deny an expense if it not allowable under the funding stream, not necessary, not in the approved budget, or deemed to be unreasonable.

[Download an expense category chart.](#)

Expense Category	Examples of Eligible Expenses	Supporting Documentation
Payroll	Payroll of grant funded staff for reimbursement or use as match	<ul style="list-style-type: none"> <li>• Payroll check register, or payroll report to verify gross wages</li> <li>• Payroll stubs showing gross pay and distribution</li> <li>• Payroll spreadsheet showing allocation by fund</li> </ul>
Benefits	FICA, Health, Dental, Vision, Life, Unemployment Insurances; Retirement and Disability	<ul style="list-style-type: none"> <li>• Premium statements or invoices from insurance or retirement providers</li> <li>• Iowa Workforce Development quarterly SUTA reports</li> <li>• Deposits of payroll taxes</li> <li>• Payroll reports reflecting employer costs</li> </ul>
Travel & Training*	Mileage or rental car, meals, lodging, parking, airfare, ground transport, baggage fees, conference registration fees, staff mileage for regular work duties such as transporting victims.	<ul style="list-style-type: none"> <li>• Itemized meal receipts must be included</li> <li>• Itemized hotel statement/invoice</li> <li>• Staff requests for reimbursement</li> <li>• Documentation of travel (mileage record, conference registration form, agenda, etc.)</li> </ul>

Contractual Services <sup>^</sup>	Book-keeping and accounting fees, security services, therapy services, etc.	<ul style="list-style-type: none"> <li>● Travel purpose</li> <li>● Taxi/bus/train receipts</li> <li>● Airline confirmation</li> <li>● Statements or invoices showing the date(s) of service, the total amount owed, the amount paid, and the contract period.</li> <li>● Vendor receipts or invoices for each item</li> <li>● A description of the item purchased</li> </ul>
Equipment	Printers, computers, laptops, scanners, tablets, phones, and other equip used for approved programming	
Repairs/Maintenance	Building & Equipment maintenance (copier, lawn care, etc.)	<ul style="list-style-type: none"> <li>● Vendor receipts or invoices showing the date or dates of service, the total amount owed, and the amount paid, with a copy of the check.</li> </ul>
Rent	Business, shelter & outreach offices	<ul style="list-style-type: none"> <li>● Vendor receipts or invoices showing the rental period &amp; the location address (unless confidential)</li> <li>● Copy of signed contract/lease agreement</li> </ul>
Utilities	Electric, water, waste removal, satellite cable	<ul style="list-style-type: none"> <li>● Statements or invoices showing the usage period &amp; the location address (unless confidential)</li> </ul>
Communications	Cell phone plans, landline services, internet, intercoms, TDD /relay machines/VP systems, etc.	<ul style="list-style-type: none"> <li>● Statements or invoices from provider</li> </ul>

If your victim service program receives more than one funding stream, you must do a payroll summary with your claims for reimbursement.

\* Out of state travel must be requested in advance and approved by your primary grant coordinator.

<sup>^</sup> Audit fees must be pro-rated based on the amount of funds received from each source. If 20% of agency funding comes from one funding source, then only 20% of audit fees can be requested from that funding source.

<sup>^</sup> Equipment purchases must be included in an approved budget. If it is not included, subrecipients should contact their grant coordinator to discuss the requested equipment purchase and then complete a budget revision request via Iowa GVS. Include the estimated purchase price and which fund source you would like to use. All purchases must follow the Procurement Standards located in [Chapter XIV. Procurement of Goods and Services](#).



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## Client Assistance:

The purpose of the client assistance section is to provide specific guidelines about reimbursements for client assistance offered to crime victims with grant funds. Click on the client assistant tab on the [claim expense summary form](#).

Client assistance can be provided with grant funds, to meet the needs of clients. Some common examples of client assistance are: rent, utilities, childcare, groceries/grocery cards, gas cards, relocation/moving expenses, work equipment, public transportation, or any reasonable cost deemed necessary to help a client remain safe and/or to achieve self-sufficiency due to victimization.

Any **unique client need** will be considered on a case by case basis with justification from the agency. If you are not sure if a cost meets the guidelines above, seek prior approval from your grant manager. If prior approval is not sought before paying for a client expense, you run the risk of the expense not being reimbursed.

Grant funds cannot be used to provide victims with cash or credit card type gift cards.

All claims for reimbursement for client assistance must have accompanying receipts or invoices. Each cost should also have a short justification documenting the purpose of the expense if the purpose is not already clear.

Example 1 - If your agency is paying for rent assistance for a client, there must be a signed receipt from a landlord, or agency check copy.

Example 2 - If you provide a victim with a gas card, there must be documentation of the last 4 digits of the card, the amount of the card, and a short explanation of why the card was issued i.e. "transportation to work," or "transportation to medical appointment."

Example 3 - If your agency pays for work equipment or supplies (i.e., work boots) so a client can continue working the form would read "work boots supplied to victim to adequately equip her for return to work duties." Expense amount-\$75, receipt from Wal-Mart attached to the form.

Any store (grocery, gas, etc.) card provided to a victim requires a short Victim Assistance Form to be signed by both the victim and an agency representative outlining the purpose of the cost and acknowledgement of the purpose by the victim. This form should be maintained in the client file.

If there are any questions about what constitutes adequate supporting documentation for an expense, please ask your grant manager.

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## Appeals:

**Appeals Process:** When any part of a claim for reimbursement, or budget revision request is denied subrecipients have the right to appeal.

**Appeal Step 1:** The subrecipient must submit an appeal within 10 business days of receipt of the denial, outlining their rationale for approval. The VSS Administrator has 10 business days to respond to the denial, either upholding, or overturning the original decision.

**The appeal form should be uploaded into Iowa GVS, using the appeal component.** Here are the instructions: 1) An agency administrator logs into Iowa GVS; 2) In the panel named My Opportunities, click

on the word appeal; 3) Click on the words Appeal Information found at the top of the left side navigation panel; 4) select the appropriate appeal type from the dropdown menu and then follow the instructions on the page.

**Appeal Step 2:** In the event the VSS Administrator upholds the denial, the subrecipient may submit an appeal to the Victim Assistance Section Chief who will respond within 10 business days by either upholding, or overturning the VSS Administrator's decision.

**Appeal Step 3:** In some instances the appeal can be brought before the CVA board. The CVA Board determination will constitute final agency action.

During the appeals process, the amount in dispute must remain unspent until a final determination is made. The subrecipient can withdraw an appeal at any point in the appeals process.

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# Organizational Contacts

The Victim Assistance Section has three grant coordinators who are assigned to oversee between 35 and 40 grants each. These grant coordinators are the primary contacts for the subrecipients. They answer grantee questions, provide resources and training. In addition, grant coordinators review the subrecipient's application, budget, budget revision requests, project scope change requests, claims for reimbursement and performance reports.

The Victim Assistance Section has two grant compliance coordinators who are responsible for monitoring, including site monitoring, grant compliance and providing technical assistance.

- Email Contacts

Victim Assistance uses a database to send emails regarding information about contracts, claims, reports, upcoming training, etc. Each agency is responsible for keeping their contacts updated in [Iowa Grants for Victim Services](#).

- Program Staff Updates

Subrecipients are **required** to provide notify their grant coordinator within 30 days of a vacancy of a grant funded position, and/or when there is turnover in a position where payroll or benefits are used as match on VSS funds.

Subrecipients should also report any other changes in key personnel to their grant coordinator via email or through a message in Iowa GVS. If any VSS funded positions remain vacant for 45 days or more, the notification must include the reason for vacancy and a plan for filling the position.

# Non-Profit Board of Directors

As communicated in the "[Iowa Principles and Practices for Charitable Nonprofit Excellence](#)" the governing board of a non-profit organization is the entity ultimately responsible for its overall operation. These guidelines are a valuable resource for Iowa non-profit organizations to observe, promoting useful management practices and public accountability.

The governing board's responsibility is to act as stewards, accountable to the state's government that granted the organization their respective charters, accountable to the federal government that granted tax-exempt status, and ultimately accountable to the public itself. The importance of board governance and expectations of grant funded non-profit agencies is reflected here [Non-Profit Organizations and Board of Director's Responsibilities](#).

It is recommended non-profit board members of agencies complete the [Resource Sharing Project E-Learning Course for Board of Directors](#). This orientation course was created in partnership between the National Network to End Domestic Violence and the National Sexual Assault Coalition Resource Sharing for non-profit board governance to use with board members, executive directors and agency staff. It is recommended new board members complete this training within three months of joining the board. A [certificate of completion](#) for each board member who completes the course should be kept in-house in the grantee's file.

\*\*The Attorney General's Office has the discretion to modify any and all training requirements.

# Required Notifications

Subrecipients must provide written notification to their grant coordinator of the following occurrences:

1. Any change of address for authorized official, project director, or financial director for the grant-funded project.
2. Any lawsuit filed against a grant funded project or program. (Note: Notification of EEOC claims or lawsuits claiming discrimination must follow the procedure outlined in [Chapter XXIV. Discrimination/Complaint Process](#).)
3. Any cessation or interruption of implementation of project activities arising from litigation, loss of staff, or programmatic restructuring
4. Change in project site or location
5. Change in the name of the person responsible for reporting civil rights findings of discrimination
6. Addition of equipment and/or Sensitive Minor Equipment to project budget not previously identified (Note: Sensitive Minor Equipment requires prior approval, see [Chapter XVI. Allowable Costs](#) and [Chapter XVII. Unallowable Costs](#).)
7. Change in e-mail address of project director, financial director, authorized official or any personnel funded by this grant
8. Any change in the subrecipient's banking information that is being used for direct deposit payment of grant funds must be reported. The subrecipient must submit a new Automated Clearing House (ACH) form to their grant manager.
9. In the event of a formal allegation of civil rights discrimination, including those related to employment, subrecipients must immediately notify their grant coordinator within ten (10) days. Subrecipients must report, in writing, the status of any on-going investigations to the AG's Office. A subrecipient may request exemption or modification of this requirement by submitting a written request to their grant coordinator.
10. In the event a federal or state court or a federal or state administrative agency makes an adverse finding of discrimination against a subrecipient agency, after a due-process hearing, on the basis of race, color, national origin, religion, age, sex, or disability the subrecipient agency must send a copy of the finding to their grant coordinator within ten (10) days.
11. Documentation of current unique entity identifier as issued by SAM.gov
12. Receipt of any additional federal grant funds to be used for a currently funded program.
13. Non-acceptance of award-submitted on agency letterhead

Subrecipients must provide written notification to their grant coordinator within **thirty (30)** days from the date of occurrence of any of the following:

1. Change in or temporary absence of the project director or financial director
2. Change in authorized official.
3. Significant changes in grant funded personnel positions which will affect the grant outcomes.

# Subrecipient Monitoring

The VSS Program is guided by two primary purposes:

1. Effective stewardship of state and federal funds for programs that provide service to victims and
2. Provision of quality technical assistance for crime victim program development, fiscal management, and best practices.

CVAD's monitoring plan is in compliance with the Office of Victims of Crime (OVC) requirements that State Administrative Agencies (SAA) develop and implement monitoring plans based on a default of regular desk monitoring, biennial on-site monitoring, audit monitoring and performance report monitoring, of all subawards. Monitoring plans must include a risk assessment plan. The rule, consistent with 2 CFR §200.331 (b), (d) and (e), permits SAAs to develop and implement alternative monitoring plans and further clarifies that SAAs may also implement alternative monitoring timeframes as well.

CVAD staff created and implemented the CVAD risk assessment tool to assess both financial and programmatic risk for CVAD subrecipients. The results from the risk assessments dictates appropriate financial and programmatic monitoring for each agency and/or funded project.

Additional information regarding subrecipient monitoring, frequency of monitoring and the risk assessment tool that is used to assess both financial and programmatic risk for CVAD subrecipients, may be found in [Chapter XXI. Subrecipient Monitoring](#).

# Performance Reports

All subrecipients are required to submit CVAD performance reports. Performance reports are an essential part of communication between programs and CVAD. These required reports provide updates on the progress of the funded programs as well as supply required statistical information. All subrecipients are required to submit CVAD Performance Reports on a bi-annual basis.

Depending on the funding stream(s) awarded, data collection and narrative responses for reports will be completed and submitted in various ways. These will be outlined in each contract.

Failure to submit performance reports in a timely manner can result in disciplinary action up to and including, suspension, reduction, and/or termination of funding.

Additional information on reporting for grant subrecipients may be found in the [Chapter IX. Reporting Requirements](#).

