Chapter 2 Post Award Requirements

Grant Management

Organizations which have been awarded victim services funding must abide by certain rules and regulations pertaining to the administration of federal funds and the implementation of victim service programming and delivery. The remaining chapters of this grant manual pertain to organizations currently administering victim services funding. It will help guide you and your organization to understand how to better manage and implement victim services grants.

FAQ – Being developed

Commonly used terms: Being developed.

Tools to assist in updating your scope of work, goals and budget details for your FY2027 applications: (1) Grantee Checklist, (2) Grantee Instructions and (3) Appendix A: Budget Details Information.

Contracting with the Victim Assistance Section

Once award notifications are made and the appeals process is complete, the Victim Assistance Section (the "Section") grant team contracts with grantees by issuing subawards via the grants management system. Subawards are issued annually with the periods of performance October 1 through September 30, unless otherwise noted. For three-year grant cycles, the first year is the competitive year. Years two and three are noncompetitive grant years with grantees submitting continuing grant applications.

Grantees must remain in compliance with state and federal rules and in good standing to receive funding in the second and third years of the grant cycle. The amount of funding awarded in the second and third year of the grant cycle is determined by funding availability.

Grantees will not be allowed to carry over or extend grants into the next grant year unless approved by the Section and allowed by the federal funder. Funds remaining at the end of the grant year are reverted (returned) to the Section. Reverted funds are added to the pool of available funds and are redistributed.

I. **The contract process:**

1. A contract shall be negotiated by the section and each applicant.
2. Prior to entering into a contract, the section or the board may require modification of the proposed program, submission of further information or documentation, or other stipulation by the applicant. The required modification, information, documentation, or stipulation shall be specified in the notification of award contract.
3. The applicant or the section may request a modification of the program budget to reflect the amount, expenses and activities allowed by the award. Both parties must agree to any modification of the applicant budget.
4. In the event of a state, federal, or other audit, the grantee shall be responsible for the audit and liable for payment of any funds required to conduct the audit, to compensate for any grant disallowance, or to repay any funds received or spent contrary to the contract, these rules, or applicable law.
5. Funds shall be spent to meet the stated services and activities as provided in the contract. Expenditures shall be reimbursed pursuant to regular reimbursement procedures of the state of Iowa in the form and manner as designated by the section.
6. The grantee shall sign the certified assurances for the award at the time of application and at any time requested by the section.
7. Nothing in these rules shall be construed as limiting the remedies available to the state or the section for improper use of awarded funds or other breach of the grantee's duties under the contract and applicable law.

Iowa Administrative Code 61—9.60.

II. **How to access and electronically sign subaward contracts:**

Both parties must sign the subaward before allowable grant expenses can be reimbursed.

The grantee's authorized official electronically signs the contract and submits it electronically in the grants management system. 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 grantees must electronically sign the agreement, check the appropriate certified assurances boxes, upload federal assurances (if applicable) and then status change the grant ***from***

Contract Pending Grantee Signature to ***Submit Contract for Signature.*** This will move the grant to the Section for their signature. Click on the link above for more detailed instructions.

A copy of the fully executed agreement will be uploaded into the grants management system on the Grant Agreement Signatures page. Grantees should download the fully signed agreement and save it in their grant file.

III. **Contract Termination**

Contracts (referred to as subawards here) can be terminated for the following reasons:

1. *Termination by grantee.* The grantee may terminate the contract at any time during the contract period by providing written notice to the section.
2. *Termination by department.* The section may terminate a contract upon a ten-day written notice when the grantee or any of its subcontractors fail to comply with the grant award stipulations, standards, or conditions. When there is a reduction of funds by executive order or by another method, the section may terminate a contract by providing a grantee with written notice.
3. *Termination for cause.* If the grantee fails to fulfill its obligations under the contract properly or on time, uses grant funds for purposes other than crime victim services approved by the program, or otherwise violates any provision of the contract, the board may terminate the contract by providing written notice to the grantee. Funds shall not be used for social justice activities. The notice shall specify the acts or omissions relied on as cause for termination. All finished or unfinished products and services provided by the grantee shall, at the option of the section, become state property. The section shall pay the grantee 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).

Iowa Administrative Code 61—9.62.

IV. **Financial statement supplied.** "Within 45 days of the termination, the grantee shall supply the section with a financial statement detailing all costs incurred up to the effective date of the termination. The section's determination of costs and amounts to be paid shall be final." Iowa Administrative Code 61—9.63.

V. **Performance reports. "**Performance reports shall be submitted to the program from all grantees. Failure to submit reports by the due date shall result in suspension of financial payments to the grantee by the program until such time as the report is received. Delinquent or inadequate reports from prior grants may detrimentally affect any award to a grantee for the following year." Iowa Administrative Code 61—9.61.

Detailed information about how to collect and report data can be found here:
https://www.iowaattorneygeneral.gov/for-crime-victims/grants/performance-reports-for-funded-programs

VI. **Indemnification.** "The grantee shall defend, indemnify, and hold harmless the state of Iowa; its officers, agents and employees; and any of the state's federal funding sources for:

1. Grantee's performance or nonperformance of a contract entered into or violation of these rules.
2. Grantee's activities with subcontractors and all other third parties.
3. Any other act or omission by a grantee, its agents, officers, or employees."

Iowa Administrative Code 61—9.64.

VII. **Records. "**Grantees shall keep statistical records and documentation of services provided and any other activities as required by the program. The program shall have immediate access during working hours to records pertaining to the contract. No notice needs to be provided to the grantee prior to inspection of the records." IAC 61—9.65.

VIII. **Update the grants management system's profile pages.** Annually, when submitting continuing grant applications, or when needed, grantees must:

1. upload an agency budget, showing the entire organization's expected income and expenses on the profile financial page
2. upload their most recent audit on the profile financial page
3. update profile section with other profile pages such as staff changes, changes to contact information, updated indirect cost rate agreements, etc.

Grant Administration

Effective Grant Administration

Grantees must have financial and programmatic systems in place to effectively implement and administer victim services grants.

I. **Background checks** –Applicants for employment at Iowa crime victim centers shall be subject to a national criminal history check through the federal bureau of investigation. See IA235D.1 for more information. Employees, volunteers, and others who have regular contact with minors are required to comply with the Department of Justice's more stringent determination of suitability to interact with minors requirement. See chapter 1 certified assurances and the DOJ award condition for more information.

II. **Communication** – It is essential to have both top down and bottom-up communication, including communication with the board of directors. Communication tools include policy and procedure manuals, regular staff meetings, updated websites, flyers, news releases, reports to the board, conversations with victims, email, budget and spending discussions, and distribution of board packets, including financial statements, program updates and staffing issues.

III. **Grant files, documents and program records** – Since most grant related documents are now sent electronically, or imported into the grants management system, it is important for organizations to create grant files. Either electronic or paper, grant files are essential to store and easily find grant related documents and forms.

IV. **Training and certification** – Training and certification requirements, if applicable, are provided in the certified assurances. Grantees must understand and be compliant with these requirements.

V. **Understand the project's goals and objectives** – Grantees will be expected to report on the stated goals and objectives as described in their applications. Those who carry out the grant activities need to have a system in place to track and report on grant activities.

VI. **Understand and have in place fiscal controls and safeguards** – Grantees must have established and maintain fiscal controls and procedures that assure federal and/or state funds available for the grant program are properly disbursed. Grant funds can only be used for approved activities and expenses. Grant funds cannot be spent prior to the start date nor after the end date of the grant.

VII. **Nonprofit board of directors** – Nonprofit organizations are required to have boards of directors, which are responsible for organizational oversight and for ensuring accountability for state and federal resources. The importance and expectations of boards of directors cannot be understated. Nonprofit boards should be diverse with expertise in nonprofit management, financial management/accounting/auditing, fundraising, human resources, law or victim services. Boards help and guide program and policy development, strategic planning, and fund raising. They can also help address complaints or grievances from staff or clients as well as hiring and providing supervision to the nonprofit executive director.

VIII. Here are some resources regarding nonprofit board of directors:

a. Iowa Code Chapter 504 https://www.legis.iowa.gov/docs/ico/chapter/504.pdf

Larned A. Waterman Iowa Nonprofit Resource Center: https://inrc.law.uiowa.edu/about-lawinrc The Larned A. Waterman Iowa Nonprofit Resource Center

Member programs can request board of director training from the Iowa Coalition Against Domestic Violence.

Grant Staff

Working With Victim Assistance Section Grant Staff

I. **Grant coordinators** – The grants team has three grant coordinators assigned to oversee between 35 and 40 grants each. Grant coordinators are grantees' primary contacts and will answer grant-related questions, provide links to resources and training opportunities. Grant coordinators' primary duties are to review and approve grant applications, project budgets, budget revisions, performance reports and other requests for changes to the grant.

II. **Grant compliance coordinators** – The grants team has two grant compliance coordinators responsible for grant compliance, site monitoring and providing technical assistance.

III. **Iowa Department of Justice Grants management system communication** – Grant staff use the grants management system to send mass emails related to grant management, or to share information and resources. The system uses system generated notifications to send status updates specific to grant projects. Grantees are required to update member contact information on the organization members page of the profile section, including inactivating and activating staff roles and access to the system.

IV. **Required notifications from grantees** – Grantees are to contact their grant coordinator when any of the following occur:

1. Staff vacancies – (a) within 30 days of a vacancy of a grant funded position or positions used as match; (b) changes to key personnel; (c) when positions have been vacant for 45 days or more with an explanation for the vacancy and the plan to either fill the position or allow the position to stay vacant.
2. Lawsuits filed against the organization related to a grant funded project. Note: Notification of EEOC claims or lawsuits claiming discrimination must follow the procedure outlined here Discrimination/Complaint Process.
3. The inability to carry out or complete project activities as presented in the approved grant application with an explanation regarding why the problem exists and if possible, a plan to complete the project.
4. Change in project site or location.
5. The person responsible for reporting civil rights findings of discrimination changes.
6. Grantees must notify their grant coordinator within 10 days of a formal allegation of civil rights discrimination, including those related to employment. Grantees must also report, in writing, the status of any on-going investigations unless they obtain an exemption from their grant coordinator. To obtain an exemption, grantees submit the request in writing along with a detailed explanation for the exemption.
7. Grantees must notify their grant coordinator within 10 days of any adverse findings of discrimination against the organization along with a copy of the finding.
8. Non-acceptance of award, or early termination of a grant submitted on agency letterhead signed by an organization official.

- **Changes to direct deposit information** – Grantees must submit a new Automated Clearing House (ACH) form to Kristi Hill, finance director if they change financial institutions related to their direct deposit.

Financial Systems

Financial Systems

Recipients of federal funding are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. See the DOJ Financial Guide, Recipients must have a financial management system in place that is able to **record and report** on the **receipt, obligation, balances and expenditure** of award funds. Keep detailed accounting records and documentation to track all of the following information:

- Federal funds awarded
- Federal funds drawn down
- Assistance Listings title and number
- Federal award identification number
- Year award issued
- Name of DOJ grant-making component or pass-through agency
- Cost sharing funds of State, local, and private organizations, when applicable
- Program income
- Subawards (amount, purpose, award conditions, and current status)
- Contracts expensed against the award
- Expenditures
- Itemized records supporting all grant receipts, expenditures and match contributions in sufficient detail to document the exact nature of fiscal activity
- Data and information for each expenditure and match contribution with proper reference to a supporting voucher or bill properly approved
- Maintain payroll authorizations and vouchers
- Maintain a time and effort reporting system. Time and effort reports must do the following:
    - Describe work activity related to the project
    - Match the expenses submitted with the corresponding claims
    - Be signed and dated by both the employee and supervisor
    - Document eligible hours worked on grant activities, itemized by funding stream
    - Document match hours in the same manner as paid staff

Please consult Subpart D of 2 C.F.R. Part 200, including 2 C.F.R. § 200.302, for more information.

Co-mingling of funds - Commingling is the blending of funds from different sources into one account with no ability to separate, track, report on and account for each award. Co-mingling federal awards is not allowed and will result in an audit finding or the potential for grantees to return some or all of their federal award. To avoid co-mingling funds, grantees must have adequate financial systems in place.

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.

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