



Chapter 3 Financial Requirements

All subrecipients are required to establish and maintain grant accounting systems and financial records to accurately account for funds awarded to them. As a grant recipient, your agency must have a financial management system in place able to record and report on the receipt, obligation and expenditure of grant funds.

Financial Management Systems

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The subrecipient's accounting system must be able to provide accurate, current and complete disclosure of how funds were expended for each funding stream; must be able to identify the Catalog of Federal Domestic Assistance (CFDA) title and number for all federal funds received and must include the following:

- A separate accountability of receipts, expenditures, obligations, and balances for each funding stream.
- 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 should do all of 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
- Maintain records supporting charges for fringe benefits.
- Maintain records supporting charges for equipment purchased, rented, donated, or destroyed. See [Chapter XII. Property and Equipment](#) for more information.
- Maintain billing records for consumable supplies (i.e. paper, printing) purchased. See [Chapter X. Purchasing Procedures](#).
- Lease agreements, contracted services, and equipment purchases that adhere to established procurement processes. See [Chapter XIV. Procurement of Goods and Services](#) and [Chapter XV. Procurement of Professional Services](#) for more information.
- Accounting records must also record program income. See [Chapter IV. Program Income Procedures](#) for more information.

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Record Retention

All financial records and supporting documents shall be retained by subrecipients for three (3) years following the closure of the agency's most recent audit report. Some records should be kept permanently. Programs should receive guidance from an independent auditor as to what is appropriate for their agency in regards to record retention.

The following are exceptions to the standard record retention period:

- If any litigation, claim, audit, or other action involving the records started before the expiration of the 3-year period, the records must be retained until all issues involving the records have been resolved and final action taken.
- When notified by CVAD, the federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- Records for real property and equipment acquired with federal funds must be retained for 3 years after the final disposition, replacement or transfer.
- When records are transferred to or maintained by the federal awarding agency or pass-through entity, the 3-year retention period requirement is not applicable to the non-federal entity.
- When required for program income earned after the period of performance, the retention period starts from the end of the non-federal entity's fiscal year in which the program income is earned.
- Indirect cost proposals submitted for negotiation must be retained for 3 years from the date of submission.
- Indirect cost proposals not required to be submitted for negotiation must be maintained for 3 years from the end of the fiscal year covered by the proposal.

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Match Requirements

When a federal grant requires match, it is essentially saying the grant cannot pay 100% of the costs of a project with federal funds. Federal grant funds are used to pay a percentage of the costs of a project and the subrecipient provides the remainder of the costs; this is their match portion. The cost of a project is the total of the federal grant funds plus subrecipients' match. The federal funding sources CVAD administers and their match requirements are noted below. Match can be cash or in-kind and must be from non-federal funds.

Match must be directly related to the project goals and objectives and must be documented in the same manner as grant funded activities.

Subrecipients with a **HIGH** or **MEDIUM** financial risk designation must provide supporting documentation for match with their claims. If the supporting match documentation is not sufficient, CVAD will request additional documentation or clarification, and may determine the match does not meet funding requirements.

Allowable match can be cash or in kind and must meet the following criteria:

1. Restricted to the same use of funds as allowed for the federal funds
2. Applicable to the project, allocable, allowable, reasonable and necessary
3. Be in accordance with generally accepted accounting principles (GAAP)
4. Cannot be used to match another federal grant
5. Cannot be from a federal source
6. Conform to special grant limitations and restrictions (for example, some grants require cash match)
7. Be shown in the approved budget

VOCA

The purpose of program match requirements is to increase the amount of resources available by the subrecipients to serve victims. A 20% cash or in-kind match is required. This match percentage is based on the total cost of each grant funded VOCA project (VOCA award plus match) so the end result is actually a 25% overall match amount (please see calculation examples below). This match must be from non-federal sources, except as provided in the most recent Office of Justice Programs [Financial Guide](#). All funds designated as match are restricted to the same uses as the VOCA funds and must be expended within the contract period. Tribes and Tribal governments are not required to provide match.

Subrecipients with VOCA funds must maintain records that show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must also be documented.

Match Waiver For VOCA Awards

If a grantee anticipates difficulty meeting the match requirement on a VOCA award, subrecipients may submit a request for a match waiver to CVAD. Generally, match waiver requests will be considered at the start of an award period. A partial, or full match waiver may be requested for each one-year increment, up to the full three-year grant cycle. Match waivers are considered by the Program Administrator and/or CVAD Director on a case-by-case basis and approval will be determined based on a well-justified hardship. Approval considerations include:

1. Who is being served by the project? (e.g. priority underserved victims as identified by CVAD in the grant solicitation-veterans, communities of color, elder lowans, limited English proficient (LEP) victims, rural victims, LGBTQIA+ identifying victims, etc.).
2. Practical and/or logistical obstacles to providing match (e.g. public agencies that do not engage in private fundraising and may have limitations on soliciting contributions).
3. Local resource constraints (e.g. recent loss of local fund sources or a rural or impoverished community with limited funding availability).
4. Increases to VOCA funding levels, whereas local funding availability has not increased to the same degree.
5. Past ability to provide match (CVAD generally expects programs to provide a similar amount of match as provided the previous grant year unless the Program can document a significant change in circumstances).
6. Length of time the program has been providing services (e.g. Is this a new project/service?).

To request a match waiver, grantees must send a match waiver justification request on agency letterhead to CVAD via email to the [VSS Administrator](#) containing the following:

1. Legal name of the agency requesting match
2. A brief description of the agency, project and services to be provided
3. A justification explaining the hardship reason for the match waiver request
4. Amounts:
 - a. Total amount of match required based on VOCA fund award
 - b. Total amount of match the agency is able to provide, broken out by in-kind and cash match.
 - c. Amount of match the agency is requesting to be waived
 - d. Amount of match provided in the prior grant year for the same project (if applicable).
5. Time period for which the match waiver request is being made (e.g. one year, two years, or the full three-year grant cycle)

6. Signatures from both the agency's Executive Director and Board Chairperson

An agency can include more than one match waiver request in the same letter as long as each request is separately detailed and includes the information requested in 2-5 from the list above.

Notification will be made electronically via email, or via the grants management system. The decision of CVAD shall constitute final agency action.

If a grantee with an approved match waiver wishes to renegotiate the terms of the waiver during the project period, an electronic request must be made to CVAD outlining the justification for an amended match waiver (e.g. additional unanticipated hardship during the project period). This request will be considered by the Program Administrator and/or CVAD Director and a decision will be rendered electronically, within one business week.

FVPSA

Subrecipients are required to provide 20% match from non-federal sources for each year of funding. If a grantee is receiving FVPSA funds for the first time, they are required to provide 35% match from non-federal sources for the first year of funding. The match may be cash or in-kind. All funds designated as match are restricted to the same uses as the FVPSA funds and must be expended within the contract period. Tribes and Tribal governments are not required to provide match.

Subrecipients with FVPSA funds must maintain records that show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must also be documented.

STOP VAWA

Governmental agencies are required to provide one-third (33.3%) match from non-federal sources based on the STOP VAWA award amount. Non-profit, nongovernmental victim services programs, tribes and Tribal governments are not required to make match. All funds designated as match are restricted to the same uses as the STOP VAWA funds and must be expended within the contract period.

Subrecipients with STOP VAWA fund must maintain records that show the source, the amount, and the period during which the match was allocated. The basis for determining the value of personal services, materials, equipment, and space must be documented. Volunteer services must also be documented.

SASP

There is no requirement for matching funds for SASP funds.

Iowa Domestic Abuse funds and Iowa Sexual Abuse funds

There is no requirement for matching funds for Iowa Domestic Abuse and/or Iowa Sexual Abuse funds.

Match Calculations

VOCA and FVPSA grant funds will pay for 80% of the total costs of a project. One way to calculate the match amount required for VOCA and FVPSA funds, is to multiply the **grant amount** by 25%. Match must be from non-federal sources. Below are a few match calculation examples:

Total cost of a FVPSA project is \$125,000. The FVPSA portion is \$100,000. The match is \$25,000.

\$125,000 (total cost of the project) x 20% = \$25,000 (match)

\$125,000 (total cost of the project) x 80% = \$100,000 (FVPSA)

\$100,000 (FVPSA grant amount) x 25% = \$25,000 (match)

Total cost of VOCA project is \$187,500. The VOCA portion is \$150,000. The match is \$37,500.

\$187,500 (total cost of the project) x 20% = \$37,500 (match)

\$187,500 (total cost of the project) x 80% = \$150,000 (VOCA)

\$150,000 (VOCA grant amount) x 25% = \$37,500

To calculate STOP VAWA match requirement, divide the award amount by three (3). As stated above

match must be from non-federal sources based on the STOP VAWA award amount. Non-profit, nongovernmental victim services agencies are not required to make match. Below are a few match calculation examples:

\$3,000 STOP VAWA award to a *police department* = $\$3,000 / 3 = \$1,000$ (match)

\$47,000 STOP VAWA award to a *county prosecutor* = $\$47,000 / 3 = \$15,667$ (match)

\$21,000 STOP VAWA award to a *nongovernmental victim services agency* = no match required

Because CVAD often combines two or more funding sources into one award it is easier to determine match requirements by multiplying the awarded funding sources times the appropriate percentage.

Award amount = \$250,000 (\$100,000 FVPSA, \$150,000 VOCA)

Match required = \$62,500 ($\$100,000 \times 25\% + \$150,000 \times 25\%$)

Cash Match

Cash match (hard) is actual cash spent by the grant recipient for project-related costs. The subrecipient's accounting records must be verifiable and trace back to source documentation including cash receipts journal, general ledgers, deposit tickets, bank statements, copies of checks/donations and documentation the cash match is not from a federal source nor is it being used to match any other grants.

Subrecipients might have cash match from the following sources:

1. state and local units of government
2. private sources
3. program income and the interest earned on the program income as long as it is identified and approved prior to making an award
4. funds appropriated by Congress for the activities of any agency of a Tribal government or the Bureau of Indian Affairs performing law enforcement functions of tribal lands
5. salaries and benefits of staff performing grant work funded with nonfederal dollars
6. otherwise authorized by law

In-Kind Match

In-kind match does not involve cash. In-kind is the value of something received or provided, which is beneficial to the project, but for which no cash exchanges hands. Since it is much easier to raise in-kind match than it is cash match, federal and state guidelines regarding in-kind are strict and require careful documentation. In-kind contributions must be verifiable from grantee records, necessary and reasonable, allowable and not included as a contribution under any other federal award. Examples of allowable in-kind contributions are:

1. equipment
2. project supplies
3. workshop or classroom materials
4. work space
5. volunteers
6. donations of tangible goods, such as clothing, food, toiletries, diapers, furniture, toys

There are a few rules subrecipients must follow when using in-kind donations or services as match:

Volunteer duties must be grant related and grant eligible; fundraising and lobbying are not grant eligible activities and therefore, cannot be used as match. The value of volunteer time must be consistent with the rate of compensation paid for similar work in the organization or labor market. Fringe benefits may be included in the valuation.

The value of donated space may not exceed the fair rental value of comparable space in a privately-owned building in the same locality.

The best way to determine the value of donated tangible goods is to ask the donor to list what was donated and state the value of the donation in writing with their signature. Donations from a company should be on

company letterhead.

In-kind Match Documentation must meet the same standards as documentation for other expenditures. Generally, the documentation should be the same as expenses which are paid directly from agency funds (i.e., original receipts).

The in-kind donation cannot be recognized as match **until it is used for the project**.

1. All in-kind matching contributions must be supported by documentation that shows how the value of the contribution was derived. The agency must be able to provide supporting documentation to substantiate the value of in-kind donations.
2. To document the value of a new item, staple the store receipt to an in-kind donation receipt. If the store receipt is not available, include as much information as possible, such as brand name, size, model number, printout from a retail store, on the in-kind receipt. This will help establish the value.
3. To document the value of a used item, use a basis for valuation such as [IRS Publication 561 Determining the Value of Donated Property](#) or the [Valuation Guide for Goodwill Donors](#). Specific itemized information about the donated item will need to be included so that the value can be verified. For example, table is not sufficient. Include information to distinguish different types of donations: kitchen table, coffee table, or end table. Another example is clothing. Itemize and describe the clothing on the in-kind receipt: a woman's shirt, man's dress pants, child's coat, etc.
4. Grant recipients must use a tracking system which shows the source, the amount, the use of these matching funds, as well as the period during which the funds were used in direct support of the project.
5. The grantee must **keep in their grant file** an in-kind receipt which should list, at a minimum, the following items:
 - Agency name
 - Donor name
 - Donor address
 - Date of donation
 - Location of donation
 - Detailed description of item/service
 - Purpose for which contribution was made
 - Value of contribution
 - Basis for valuation (how value was determined)
 - Who made the determination
 - Signature of donor if possible
 - Name of employee accepting the donation
 - Signature of employee accepting the donation

The basis for determining the value of personal services, materials, equipment and space must be documented.

Volunteer Tracking

Volunteer services must be documented and supported by the same methods used by the agency for its own employees, including but not limited to, time, description of the activity, date provided, etc. Grant programs using volunteers as in-kind match must ensure the volunteers are performing allowable activities. CVAD requires volunteer signatures on the volunteer tracking form.

NOTE: The Fair Labor Standards Act defines volunteer as "an individual who performs hours of service for a public agency for civic, charitable, or humanitarian reasons without promise, expectation, or receipt of compensation for services rendered..." 29 CFR 553.101(a). "The 1985 Amendments provide that employees may volunteer hours of service to their public employer or agency provided 'such services are not the same type of services which the individual is employed to perform for such public agency.' The phrase 'same type of services' means similar or identical services." 29 CFR 553.103.

Check out CVAD's [match calculation document](#) to help you calculate match.

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Indirect Costs

Your agency can elect to charge an indirect rate to your CVAD funded grant(s). If you are not familiar with indirect costs, please read the following information.

Definition

Defined under [200.56 Indirect Costs](#), Indirect (F&A) costs means those costs incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved.

The Uniform Administrative Requirements allows any non-federal entity that has never received a negotiated indirect cost rate to elect to charge a *de minimis* rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. ***If a non-federal entity chooses to charge the 10% de minimis rate, then the non-federal entity must use this rate consistently for all federal awards until such time as the non-federal entity chooses to negotiate for a rate.***

2 CFR 200.412 Classification of Costs

There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the federal award or other final cost objective. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances either as a direct or an indirect cost in order to avoid possible double-charging of Federal awards.

What type of indirect base can subrecipients apply the 10% de minimis towards?

2 CFR 200.414(f) states that an eligible non-federal entity which elects to charge the 10% de minimis may only apply the rate to modified total direct costs (MTDC). The MTDC as a base removes "distorting items" (i.e. capital expenditures, contracts, and subgrants). Non-federal entities are allowed to charge the 10% de minimis to the first \$25,000 of its subgrants and contracts. Click [here](#) for more information on indirect costs.

What this means for your agency?

If your agency has a federally negotiated indirect rate, the agreement must be included as part of your grant application or sent to your grants specialist. If your agency does not have a federally negotiated indirect rate and wishes to use the de minimis rate of 10%, the agency must notify CVAD by completing the [CVAD Indirect Costs Rate Form](#) and include it with the grant application email it to your grants specialist.

Your grant amount will not change if you charge an indirect rate to your project. The calculation to determine direct costs from your award amount is = Total award amount divided by 1.10 (for 10%).

This is an example of how to determine what portion of your award is direct and what portion is indirect

Award amount = \$100,000

Direct amount= \$90,909 ($\$100,000 / 1.10$)

Indirect amount = \$9,091 ($90,909 \times 10\%$)

Award amount ($\$90,909 + \$9,091 = \$100,000$)

Indirect costs are always a percentage of the MTDC. MTDC are the total direct costs minus certain costs that cannot be included when calculating indirect costs, such as capitalized equipment and amounts of subcontracts greater than \$25,000.

Your agency does not have to show documentation for indirect costs when submitting claims, or when CVAD conducts desk audits or on-site financial monitoring.

Indirect costs can be calculated on both grant funds and on claimed match.

Indirect costs charged on grant funds can be waived and used as match. If your program struggles to meet match, it can waive collecting indirect costs and use the value as match.

Costs are either direct or indirect. Direct costs are specific to a project/grant. If you didn't have the grant/project, you likely wouldn't have the expense. Indirect costs are basically the costs of doing business, also called overhead or administrative costs. Indirect costs are not tied to a specific grant. Agencies, which are 100% funded by CVAD could, in theory, have nearly 100% of their grant funds be direct funds, because almost all funds are allocable to the CVAD grant(s), except fundraising, lobbying and prevention services.

As stated earlier, there are no universal rules for classifying costs as direct or indirect; however, the costs **must be consistently applied**. A cost can't be a direct cost on one project and an indirect cost on another project. Here are a few examples of each:

Cost Category	Direct or Indirect	Explanation
Salary and benefits of staff who work directly with programs	Direct	The program has the benefit of the person working specifically for the grant. It is easy to allocate time/expenses to the project. If the staff works on more than one project, he/she can allocate the time spent on each project.
Executive director and other administrative staff, such as finance, IT, marketing, HR, etc. salary and benefits	Indirect – generally	It is more difficult to allocate directors' time to various funding sources, since directors are responsible for all aspects of the agency.
Office supplies	Indirect	Office supplies are a part of doing business. It is expected your agency would have sufficient supplies to do business. It is difficult to allocate the cost of pens, paper or toner to specific projects.
Project supplies	Direct	You would not have the expense if you didn't have the project. These are not general office supplies. Project supplies are specific to a project.
Rent, utilities, maintenance, repairs, phone, Internet, audit, insurance	Indirect, unless shelter	Shelter expenses directly benefit the program and the listed expenses (except audit and maybe some insurance) are not shared with other programs. If the shelter went away, these expenses would go away.

Sample budget using 10% de minimis rate

Budget Item	CVAD Budget	Match Budget	Explanation
Personnel costs (salaries and fringe for direct grant work)	\$50,000	\$12,500	All of personnel are included in MTDC)

Travel (directly related to grant)	\$4,000	\$1,000	All travel is included in MTDC
Subcontract for victim services – not a vendor	\$50,000	\$0	Only the first \$25,000 is included MTDC.
Client Assistance	\$25,000	\$0	All client assistance is included in MTDC
Total direct costs	\$129,000 (all costs)	\$13,500 (all costs)	The total of all direct costs.
MTDC (exclude costs on contractor greater than \$25,000)	\$104,000 (\$129,000 minus \$25,000. You can charge indirect costs on the first \$25,000 of a contract)	\$13,500 (same as above since there are no costs excluded)	MTDC (modified total direct costs) = total direct costs minus excluded costs.
Indirect rate 10% of MTDC	\$10,400	\$1,350	\$104,000 x 10% CVAD \$13,500 x 10% Match
Total budget	\$139,400 (\$129,000+\$10,400)	\$14,850 (\$13,500+\$1,350)	\$139,400 = total direct costs + indirect costs (CVAD budget) \$14,850 = total direct costs + indirect (match budget)

In the example above, we only included costs directly allocated to grant activities. Any costs not easily allocated to grant activities as office supplies, utilities, toner, executive director salary/benefits, telephone/Internet or maintenance/repairs are often included as part of the indirect costs.

You can include the value of indirect costs on your match budget. In the budget example above, the agency anticipates claiming \$1,350 of indirect costs to meet their match requirement.

For this purpose, subcontractors are associated with providing specific program needs, vendors provide general services and are not associated with a grant program i.e., copier, maintenance.

Example of a claim (simplified) using indirect costs:

Budget Item	Monthly claim	Match Budget	Explanation
Personnel costs	5293.49	1323.37	Actual costs divided between grant and match
Travel	519.23	129.8	Actual costs divided between grant and match

Contract expense		49375	0	Actual contract costs
Client Assistance		5000	0	Actual costs
Total direct costs	\$60,187.72 (all costs)		\$1,453.17 (all costs)	The total of all direct expenses
MTDC (exclude costs on contractor greater than \$25,000)	\$35,812.72 (You can charge indirect costs on the first \$25,000 of a contract)		\$1,453.17 (same as above since there are no costs excluded)	MTDC – excludes contract costs more than \$25,000 \$35,812.72 x 10% CVAD
Indirect rate 10% of MTDC		3581.27	145.31	\$1,453.17 x 10% Match For this claim the agency contributed \$1,598.48 in match.
Total Claim	\$63,698.99 (\$60,187.72+3,581.27)		\$1,598.48 (\$1,453.17+\$145.31)	

In the above example, the claim follows the budget. Actual costs that will be charged to the grant (reimbursed) and credited to match is what is submitted.

If the agency decides to waive collecting indirect costs (not be reimbursed for them) CVAD would reimburse only the total direct costs (\$60,187.72) and \$3,581.27 could shift to the match column. This is a good option for an agency who typically struggles to meet match. The grant amount won't change. The budget will only include direct costs and your match budget will include waived indirect costs from the grant budget. If you do not struggle to meet match, using waived indirect as match is not something likely to be considered.

Finally - If an agency chooses to use an indirect rate, it must be used consistently for all their programs. Once a cost is considered an indirect cost, it can't also be a direct cost. Your agency does not have to apply for the de minimis rate. Your agency does not have to provide backup documentation for indirect costs. Indirect costs, once reimbursed to your agency are generally unrestricted funds.

Please email [VSS Administrator](#) or call with questions 515-725-4130.

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Program Advances

The Iowa Attorney General's Office, Victim Services Support Program offers, on a limited basis, the opportunity for a funded agency to apply for, and receive, advance grant funds. Advance grant funds are provided to funded agencies or programs in advance of their first claim for reimbursement. The purpose of advance funds is to assist programs with limited operating funds to pay for essential expenses, such as payroll.

Application for advance funds

An agency wishing to apply for advanced funds must send an email to its assigned grant manager. The

email request for an advance in funding must include the following items: 1) name of agency, including pertinent contact information for the executive director and the fiscal director; 2) name/title of program; 3) a formal request for advance funding, detail the need for the advance and why the agency/program would endure a hardship if the advance were not funded; and 4) an agency budget and most recent audit.

Advance Claim Voucher

The agency must complete the [advance claim voucher form](#).

How advance funds are paid back

Subrecipients submit regular claims, (usually monthly) and are paid on a reimbursement basis for actual funds spent. Funds advanced to an agency are deducted from the final claim.

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Co-mingling of Funds

Neither the DOJ Financial Guide nor the Uniform Requirements (2 CFR 200) require the physical separation of cash deposits; however, all recipients of grant funds must ensure agency funds and federal funds are accounted for separately. The accounting systems of all grant recipients must ensure that:

1. Agency funds are not commingled with funds from other federal agencies.
2. Commingling funds on either a program-by-program basis or project-by-project basis are prohibited.
3. Funds specifically budgeted and/or received for one project may not be used to support another. The grant recipient must establish a system to provide adequate fund accountability for each project.

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Reporting Irregularities or Fraud

If you know about waste, fraud, abuse, conflict of interest, bribery, gratuity, or other similar misconduct, or whistleblower reprisal relating to a CVAD employee, program, contract, or grant you may report it to CVAD. To contact the Crime Victim Assistance Division:

Office of the Attorney General of Iowa
Crime Victim Assistance Division
Lucas State Office Building
321 East 12th Street
Des Moines, IA 50319

Phone: 515-281-5044
Toll-Free: 800-373-5044
FAX: 515-281-8199

Fraud, waste or abuse claims involving federal funds administered by CVAD must adhere to the following regulations. The grant recipient must promptly refer to the DOJ Office of Inspector General any credible evidence that a principal, employee, agent, contractor, subgrantee, subcontractor, or other person has either:

1. Submitted a false claim for grant funds under the False Claims Act; or
2. Committed a criminal or civil violation of laws pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving grant funds.

Potential fraud, waste, abuse, or misconduct should be reported to the OIG.

Mail:

Office of the Inspector General
U.S. Department of Justice

Investigations Division
950 Pennsylvania Avenue, N.W.
Room 4706
Washington, DC 20530

Email:
oig.hotline@usdoj.gov

Hotline:
(800) 869-4499 - contact information in English and Spanish

Hotline fax:
(202) 616-9881

For additional information, please visit the [DOJ OIG website](#).

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Supplanting of Funds

Federal funds must be used to supplement existing funds for program activities and not replace those funds, which have been appropriated for the same purpose. Potential supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is a potential presence of supplanting, the grant recipient will be required to supply documentation demonstrating the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

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Year-End Closeouts

Subrecipients have 30 days after the end date of the grant period to submit their final claim. It is recommended subrecipients start this process once all monies have been obligated. This will assist in accurate reporting of financial information on the final claim.

Any unspent funds at the end of the contract period will revert to CVAD unless funding requirements, rules, or law prohibit the funds from being spent beyond the contract time frame.

Costs reimbursed will not exceed the approved budget.

- a. Final claim: The final claim is to be submitted within 30 days after the end of the subgrant period. The final claim can include all allowable expenses from the entire subgrant period as long as the expenses were not previously requested.
- b. All match requirements must be met by the end of the subgrant period and submitted with the final claim if not submitted prior to the final claim.
- c. Final Performance Report: This report should be prepared in accordance with instructions provided by CVAD within 45 days from the end of the subgrant period. The final claim will not be paid until receipt of this report.
- d. Equipment with a per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to CVAD. For equipment with a fair market value greater \$5,000 contact CVAD for additional instructions. If not already on file with CVAD, grantees must submit a current [Project Equipment Summary Report](#).

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Audits

Organizations expending more than \$750,000 in federal funds are subject to audit requirements as required by Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principals and Audit Requirements for Federal Awards.

Organizations expending less than \$750,000 in federal funds must have an audit conducted in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States, also known as Yellow Book Audit.

All grant recipients will provide for an independent audit report on an annual basis as required by Office of Management and Budget (OMB), Uniform Administrative Requirements and the OCFO Financial Guide. It will comply with the organizational audit requirements and further understands and agrees that funds may be withheld, or other related requirements may be imposed, if outstanding audit issues (if any) are not satisfactory and promptly addressed as further described in the current edition of the OVW Financial Grants Management Guide and the OCFO Financial Guide.

The grant recipient must comply with all federal and state grant audit requirements including The Single Audit Act Amendments of 1996; 2 CFR Part 200, as amended; and any other applicable law or regulation, and any amendment to such other applicable law or regulation which may be enacted or promulgated by the federal government.

If the grant recipient is a local government or non-profit organization and expends \$750,000 or more in federal awards (from all sources including pass-through awards) in the organization fiscal year (12-month turnaround reporting period), the grant recipient is required to provide the appropriate single or program specific audit in accordance with the provisions outlined in 2 CFR Part 200.501.

If the grant recipient expends total federal awards of less than the threshold established in 2 CFR 200.501, it is exempt from federal audit requirements for that year, but records must be available for review or audit by appropriate officials (or designees) of the federal agency, State Agency and Government Accountability Office (GAO).

All private agencies agree to perform an audit in accordance with Iowa Code Section [11.36](#) audit requirements. This section shall apply only when the grant or contract exceeds \$150,000 or when the grant or contract together with other grants or contracts awarded by the governor or a state agency during the fiscal year exceeds \$150,000 in the aggregate.

Audits are due the earlier of 30 days after the receipt of the auditor's reports or nine months after the end of the audit period. For example, audits for period ending June 30th would be due no later than March 31st and audits for period ending September 30th would be due no later than June 30th.

Audits may be submitted electronically to fiscal department, or you may submit a hard copy to Crime Victim Assistance Division, Accounting Department, Lucas State Office Building, 321 East 12th Street, Des Moines, IA 50319.

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