Oregon Department of Justice
Crime Victim and Survivor Services Division

Sexual Assault Services Program (SASP)

SASP Guidance

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SECTION I - INTRODUCTION

A. History of the Sexual Assault Services Grant Program

The Sexual Assault Services Formula Program (SASP), created by the Violence Against Women Act of 2005 (VAWA 2005), is the first federal funding stream solely dedicated to the provision of direct intervention and related assistance for victims of sexual assault. This program is administered by the United States Department of Justice, Office of Justice Programs, Office on Violence Against Women (OVW).

SASP directs grant dollars to states and territories to assist them in supporting rape crisis centers and other nonprofit, nongovernmental organizations or tribal programs that provide core services, direct intervention, and related assistance to victims of sexual assault. Rape crisis centers and other nonprofit and tribal organizations, such as dual programs providing both sexual violence and domestic violence intervention services, play a vital role in assisting sexual assault victims through the healing process, as well as assisting victims through the medical, criminal justice, and social support systems. Funds provided through the SASP Formula Program are designed to supplement other funding sources directed at addressing sexual assault at the state and territorial level.

B. Purpose of the Sexual Assault Services Grant Program

Overall, the purpose of the SASP is to provide intervention, advocacy, accompaniment, support services, and related assistance for adult, youth, and child victims of sexual assault, family and household members of victims, and those collaterally affected by the sexual assault.

The SASP Program supports efforts to help survivors heal from sexual assault trauma through direct intervention and related assistance from social service organizations such as rape crisis centers through 24-hour sexual assault hotlines, crisis intervention, ongoing advocacy, and medical and criminal justice accompaniment. The SASP will support such services through the establishment, maintenance, and expansion of rape crisis centers and other programs and projects to assist those victimized by sexual assault.

C. Crime Victim and Survivor Services Division

The Oregon Department of Justice (DOJ), Crime Victim and Survivor Services Division (CVSSD) is the State Administrative Agency (SAA) for the STOP VAWA Program. CVSSD makes subawards to State and local units of government, non-profit agencies, and tribal governments.

CVSSD has prepared this Grant Guidance to assist grantees in complying with state and federal requirements. Federal fiscal requirements are set forth in the 2015 DOJ Grants Financial Guide (updated in December 2017).

The Crime Victim and Survivor Services Division (CVSSD) of the Oregon Department of Justice has specific program responsibility for SASP (as authorized through ORS 147.231) and other grants related to serving victims of crime.
SECTION II - SASP PURPOSE AREAS

A. Federal Purpose

By statute, funds under the SAS Formula Grant Program may be used for the following purpose:

- To support the establishment, maintenance, and expansion of rape crisis centers and other nongovernmental or tribal programs and projects to assist individuals who have been victimized by sexual assault, without regard to the age of the individual.

Note: “Without regard to the age of the individual” was added by the Violence Against Women Reauthorization Act of 2013, which means that funded service providers must provide services to sexual assault victims of all ages.

SAS Formula Program funds shall be used to provide grants to rape crisis centers and other non-profit, nongovernmental organizations or tribal programs for programs and activities that provide direct intervention and related assistance. Intervention and related assistance may include any of the following statutory program purposes (pursuant to 34 U.S.C. § 12511(b)(2)(C)):

1. 24-hour hotline services providing crisis intervention services and referral;
2. Accompaniment and advocacy through medical, criminal justice, and social support systems, including medical facilities, police, and court proceedings;
3. Crisis intervention, short-term individual and group support services, and comprehensive service coordination and supervision to assist sexual assault victims and non-offending family or household members;
4. Information and referral to assist the sexual assault victim and non-offending family or household members;
5. Community-based, culturally specific services and support mechanisms, including outreach activities for underserved communities; and
6. Development and distribution of materials on issues related to the services described in the previous bullets.

Notes:
Under the SAS Formula Program, grant funds cannot be used to support sexual assault forensic examiner projects or criminal justice activities (e.g., law enforcement, prosecution, courts, or forensic interviews).

The term “rape crisis center” means a nonprofit, nongovernmental, or tribal organization, or government entity in a state that provides intervention and related assistance to victims of sexual assault without regard to their age. In the case of a governmental entity, the entity may not be part of the criminal justice system (such as a law enforcement agency) and must be able to offer a comparable level of confidentiality as a nonprofit entity that provides similar victim services,
B. OVW Priority Areas

1. Projects that improve services for and/or the response to victims of sex trafficking and other severe forms of trafficking in persons who have also experienced sexual assault.
2. Projects that meaningfully increase access to OVW programming for specific marginalized and/or underserved populations (based on race, ethnicity, sexual orientation, gender identity, disability, age, etc.).
3. Projects that increase the use of promising, evidence-based, and evidence-building practices, where available.

C. State SASP Program Priorities

CVSSD has determined that SASP funding will be used to projects that address the needs of adult, youth or child victims of sexual assault who are members of underserved and marginalized communities. The SAS Formula Grant Program priorities are to:

1. Enhance and strengthen meaningful access to population specific and culturally proficient services for adult, youth and child victims of sexual assault, including victims of sex trafficking, who are members an underserved and marginalized population, including services to family and household members of such victims and those collaterally affected by the victimization.
2. Direct funding to address one or more of the gaps identified in the Assessment of Services to Survivors of Sexual Assault Survey and the 2017 Sexual Assault Underserved Populations Survey: Advocacy Services, Counseling and support Group Services, Emergency Financial Support Services, Medical and Legal Accompaniment, System Collaboration and Outreach, and other locally documented service gaps.
3. Direct funding to organizations that can demonstrate a track record of providing population specific services.
4. Enhance equitable distribution of grants and grant funds in rural areas.
5. Prioritize distribution of grants and grant funds to organizations that fully meet the criteria for population specific organizations.

Population Specific Services. To be eligible to receive SASP funding, applicants must demonstrate that their organization or program fully meets or substantially meets the following Criteria for Population Specific Services.

- Population-specific interventions are founded and designed from the ground up, by and for members of the underserved community and with ongoing guidance from survivors in the community.
- The underserved community’s lived experiences, core constructs, and particular needs (as defined by people from that community) inform the design and implementation of services and decision-making.
- Services are population-specific focused; values, behaviors, expectations and norms of the underserved community are present at every level of service delivery.
- Services and materials are provided in an accessible format in the primary language or mode of communication of the underserved group and/or individual survivor.

(Based on definition developed by OCADSV Culturally Specific Definitions Work Group)
**Population Specific Organization.** SASP awards will be prioritized to nonprofit, nongovernmental organizations or federal recognized Tribes that primarily serve members of a specific underserved population, that have demonstrated experience and expertise providing targeted services to members of that specific underserved population and that meet the following criteria for Population Specific Organizations:

- Decision makers, board members, management, leadership and/or advisory boards are mostly people of the underserved community.
- Decision makers, board members, management, leadership and/or advisory boards consistently and actively engage in ongoing learning.
- Decision makers, board members, management, leadership and/or advisory boards process and practice to support alignment of services with needs and values of the underserved community.
- The community being served (including individuals, groups, other providers) recognizes the organization as a population specific provider.
- All organization staff is mostly people of the underserved community.
- A majority of people the organization serves are from the underserved community. (Based on definition developed by OCADSV Culturally Specific Definitions Work Group)

**D. Activities that Compromise Victim Safety and Recovery and Undermine Offender Accountability**

The following activities have been found to jeopardize victim safety, deter or prevent physical or emotional healing for victims, or allow offenders to escape responsibility for their actions and therefore will not be supported with OVW funding:

1. Procedures or policies that exclude victims from receiving safe shelter, advocacy services, counseling, and other assistance based on their actual or perceived sex, age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, or the age and/or gender of their children;
2. Procedures or policies that compromise the confidentiality of information and/or privacy of persons receiving OVW-funded services;
3. Procedures or policies that require victims to take certain actions (e.g., seek an order of protection, receive counseling, participate in couples counseling or mediation, report to law enforcement, seek civil or criminal remedies, etc.) in order to receive services;
4. Procedures or policies that fail to include conducting safety planning with victims;
5. Project design and budget that fail to account for the access needs of participants with disabilities and participants who have limited English proficiency or who are Deaf or hard of hearing;
6. Materials that are not tailored to the dynamics of sexual assault or to the culturally specific population to be served; and
7. Policies that deny individuals access to services based on their relationship to the perpetrator.

This list is not exhaustive. Any activities that may compromise victim safety and recovery or undermine offender accountability must be removed from the application prior to approval by CVSSD.
E. Out-of-Scope Activities

The activities listed below are out of the program scope, and they cannot be supported by SAS Formula Program funding.

- Research projects (This does not include program assessments conducted only for internal improvement purposes. For information about DOJ regulations on research involving human subjects, see “Research and Protection of Human Subjects” in the Solicitation Companion Guide).
- Activities focused on prevention efforts and public education (e.g., bystander intervention, social norms campaigns, presentations on healthy relationships, etc.).
- Criminal justice-related projects, including law enforcement, prosecution, courts, and forensic interviews.
- Sexual Assault Forensic Medical Examiner programs.
- Sexual Assault Response Team coordination (this does not pertain to a grant-funded advocate attending a SART or other sexual assault-related inter-agency response team meeting).
- Providing training to allied professionals and the community (e.g., law enforcement, child protection services, prosecution, other community based organizations, etc.).
- Domestic violence services unrelated to sexual violence.

Any out of scope activities will be removed from the application prior to approval by CVSSD.

F. SASP Unallowable Costs

Funds may not be budgeted or used for the following items:

- Lobbying or attempts to influence members of Congress, the Oregon Legislature, County Commissions, City Councils, or other legislative bodies;
- Fundraising campaigns, endowment drives, or solicitation of gifts and bequests;
- Purchase of real property and vehicles; and
- Construction or physical modification to buildings, including minor renovations (such as painting or carpeting).
- Tips, bar charges or related items while on travel status. Meals not associated with overnight travel. An exception is made for breakfast and dinner as long as the employee is on travel status for a minimum of two hours before the beginning of their regularly scheduled work shift or after the end of their regularly scheduled work shift.
- Per diem reimbursement for meals provided at conferences or training seminars.
- Food related items such as napkins, plates, forks, spoons, and knives, beverages, snacks, candy or food items not provided in conjunction with a working lunch or dinner at a conference or training event (see page 20 for definition of working lunch or dinner).
- Entertainment, honoraria, gifts, gift certificates, cards, movies, recreation, sporting events, holiday and birthday supplies, or expenses related to these items.
- Personal items such as makeovers, non-professional membership dues, flowers, cards, social events or promotion of church attendance.
- Grant writing.
- Compensation to federal employees.
- Activities that compromise victim safety: pre-trial diversion programs not approved by OVW or the placement of offenders in such programs; mediation; joint victim-offender counseling; mandatory counseling for victims; penalizing victims who refuse to testify; promoting procedures that require victims to seek legal sanctions against the offender; anger management programs for offenders, etc.
- Corporate formation.
- Interest on non-bearing items or the cost of money.
- Laundry charges.
- Expenses related to the maintenance or sale of forfeited or seized property.
- Mass transit tax.
- Late fees or finance charges.
- Audit costs for audits not required in accordance with 2 CFR Part 200, subpart F are unallowable
- Furniture or moving household goods to a new location.
- Voucher programs.
- Stipends or incentives.
- Legal or defense services for perpetrators.

CVSSD reserves the right to modify the list of unallowable costs as necessary.

SECTION III - AWARD CONDITIONS

A. SASP Award Conditions

The following grant-specific conditions must be met by all Grantees receiving SASP funding.

Not Charge Survivors for SASP-Funded Services. Programs must provide services to survivors of sexual assault, at no charge, through the SASP-funded project.

Assist Survivors in Seeking Crime Victim Compensation Benefits. Such assistance may include identifying and notifying crime victims of the availability of compensation, assisting them with application forms and procedures, obtaining necessary documentation, and/or checking on claim status.

Promote Community Efforts to Aid Survivors of Sexual Assault. Promote, within the community, coordinated public and private efforts to survivors of sexual assault. Coordination may include, but is not limited to, serving on state, federal, local, or Tribal task forces, commissions, working groups, coalitions, and/or multi-disciplinary teams. Coordination efforts
also include developing written agreements that contribute to better and more comprehensive services to survivors of sexual assault. Coordination efforts qualify an organization to receive SASP funds, but are not activities that can be supported with SASP funds (although the time of SASP-funded staff to attend a SART or other sexual assault-related inter-agency response team meeting can be supported with SASP funds).

**Not Compromise Survivor Safety and Recovery.** Programs must not compromise survivor safety and recovery through any of their activities. Refer to the compromising activities listed on pages 6-7.

**Lead Sexual Assault Worker.** It is required that any program receiving SASP funding must designate a lead worker to act as a contact to receive and disseminate sexual assault information within the organization and to community partners, as possible.

**Training Requirement.** Programs must demonstrate that any staff person approached by a sexual assault survivor should be able to respond appropriately to assess need, provide crisis intervention and information and referral; as appropriate, staff may pass longer-term needs and services to the SASP-funded staff.

CVSSD requires of a minimum of 40 hours of content-specific training for victim advocates for all grant-funded staff and volunteers serving survivors of domestic violence and sexual assault. Refer to [CVSSD website](https://www.doj.state.or.us/crime-victims/training-opportunities/cvssd-trainings/) for a detailed outline of the training requirements. In addition, to qualify for SASP funding, each staff person wholly or partially funded by SASP must attend at least 24 hours of advanced sexual assault training within the last 24 months. SASP-funded projects may also be required to designate a Population Specific Lead and Liaison that must have attended at least 24 hours of training on population- and culturally-specific services and practices within the last 24 months.

**Training resources:**
- CVSSD Training Page: [https://www.doj.state.or.us/crime-victims/training-opportunities/cvssd-trainings/](https://www.doj.state.or.us/crime-victims/training-opportunities/cvssd-trainings/)
- Training - Oregon Council Against Domestic and Sexual Violence (OCADSV): [https://www.ocadsv.org/resources/online-core-advocacy-training](https://www.ocadsv.org/resources/online-core-advocacy-training)
- Webinars - Battered Women’s Justice Project: [http://www.bwjp.org/training.html](http://www.bwjp.org/training.html)
- Webinars - National Family Justice Alliance: [https://www.familyjusticecenter.org/training/webinars/](https://www.familyjusticecenter.org/training/webinars/)
- Webinars and online courses - End Violence Against Women International: [http://olti.evawintl.org/Courses.aspx](http://olti.evawintl.org/Courses.aspx)
B. Federal Award Conditions

Confidentiality and Privacy Protections. OVW grantees and their subgrantees are prohibited from disclosing personally identifying information collected in connection with services requested, utilized, or denied through the grantee and their subgrantee’s programs, to any third party or third-party database without informed, written, reasonably time-limited consent of the person, unless compelled by statutory or court mandate.

Where there is a mandate to release information, grantees and subgrantees must make reasonable attempts to provide notice to victims affected by the disclosure of information. They must also take necessary steps to protect the privacy and safety of the persons affected by the release of the information.

Regarding un-emancipated minors or persons with disabilities lacking legal capacity to consent, a parent or guardian may consent to the disclosure; however, an abuser of a minor, person with disabilities, or the minor’s other parent is prohibited from giving consent to the disclosure. If a minor or a person with a legally appointed guardian is permitted by law to receive services without the parent’s or guardian’s consent, the minor or person with a guardian may release information without additional consent.

In addition, grantees and subgrantees may share aggregate information regarding their services and demographics of victims for certain purposes, if this information does not identify specific individuals or reveal personally identifying information. They may share such aggregate information with appropriate agencies to comply with federal, state, tribal, or territorial reporting, evaluation, and data collection requirements. For protection order purposes, they may also share court and law enforcement-generated information contained in secure, governmental
registries. Moreover, they may share law enforcement- and prosecution-generated information necessary for law enforcement and prosecution purposes.

**Civil Rights Compliance.** As a condition for receiving funding from OVW, recipients must comply with applicable federal civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and the Department of Justice (DOJ) regulation for the Equal Treatment of Faith-Based Organizations. Depending on the funding source, a recipient must also comply with the nondiscrimination provisions within the applicable program statutes, which may include the Omnibus Crime Control and Safe Streets Act of 1968 (“the Omnibus Crime Control and Safe Streets Act”). Collectively, these federal laws prohibit a recipient of OVW funding from discriminating either in employment (subject to the exemption for certain faith-based organizations discussed below) or in the delivery of services or benefits on the basis of race, color, national origin, sex, religion, or disability. In addition, recipients of OVW funding may not discriminate on the basis of age in the delivery of services or benefits.

Compliance with Title VI of the Civil Rights Act of 1964, which prohibits recipients from discriminating on the basis of national origin in the delivery of services or benefits, entails taking reasonable steps to ensure that persons with limited English proficiency (LEP) have meaningful access to their programs and activities. An LEP person is one whose first language is not English and who has a limited ability to read, write, speak, or understand English. To assist recipients in meeting their obligation to serve LEP persons, the DOJ has published a guidance document, which is available at https://www.lep.gov/guidance/guidance_DOJ_Guidance.html. Additional resources are available at http://ojp.gov/about/ocr/lep.htm. OVW strongly encourages applicants and recipients to develop a language access plan. Additionally, applicants must include within their program budgets the costs for providing interpretation and translation services to eligible LEP service populations or explain how language access will be provided if grant funds are not necessary for this purpose.

**Violence Against Women Act Non-Discrimination Provision.** The Violence Against Women Reauthorization Act of 2013 added a new civil rights provision that applies to all FY 2018 OVW grants. This provision prohibits OVW grantees from excluding, denying benefits to, or discriminating against any person on the basis of actual or perceived race, color, religion, national origin, sex, gender identity, sexual orientation, or disability in any program or activity funded in whole or in part by OVW. For more information on this prohibition, see http://www.justice.gov/ovw/docs/faqs-ngc-vawa.pdf.

**Accessibility.** Recipients of OVW funds must comply with applicable federal civil rights laws, which, among other things, prohibit discrimination on the basis of disability and national origin. Compliance with these laws includes taking reasonable steps to ensure that persons with limited English proficiency (LEP) have meaningful access to recipients’ programs and activities and ensuring that these programs and activities are readily accessible to qualified individuals with disabilities, including Deaf or hard of hearing individuals. Applicants must allocate grant funds or other available resources to support activities that help to ensure meaningful and full access to their programs. For example, grant funds can be used to support American Sign Language (ASL) interpreter services, language interpretation and translation services, or the purchase of adaptive equipment. The U.S. Department of Justice has issued guidance for grantees to help comply with their civil rights responsibilities that recipients have in providing language services to LEP individuals. The guidance document can be accessed on the Internet at www.lep.gov.
Supplanting. Federal funds must be used to supplement existing funds and not replace (supplant) non-federal funds which have been appropriated for the same purpose. Grant funds may not be used to pay for program activities that the recipient is already obligated to pay or has already funded. Grant funds must be used to increase the total amount of funds available to deliver program services. The rules governing supplanting also apply to any funds used as match.

Supplanting may be a subject of post-award monitoring and audit. If there is a potential presence of supplanting, the grantee may be required to supply documentation demonstrating that the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

OVW has provided further guidance on the non-supplanting prohibition as it applies to Non-profit Organizations:

Match Funds for SASP-Funded Programs. A contribution of non-Federal dollars (match) is not required for this program, but applicants are encouraged to maximize the impact of Federal dollars by contributing to the costs of their projects. Supplemental contributions may be cash, in-kind services, or a combination of both.

Federal Funding Accountability and Transparency Act Of 2006.
1. Dun and Bradstreet Data Universal Numbering System (DUNS). As of January 1, 2009, all recipients and subcontractors of Federal VAWA funds must comply with the Federal Funding Accountability and Transparency Act of 2006 (FFATA) that requires certain information on Federal funding over $25,000 be posted on the USAspending.gov website. This applies not only to the state as the primary Federal grantee, but to subgrantees as well. DOJ CVSSD encourages all applicants and potential grantees to ensure that they are in compliance with the FFATA prior to applying for any federal grant funds. All subgrantees should make certain that their agency has a DUNS number and is registered with the System for Award Management (SAM).

In order to satisfy this requirement, subgrantees and their subcontractors receiving $25,000 or more over the life of any sub-award (i.e., SASP grant award period) will be required to have a DUNS number and to maintain a current registration with the SAM.

2. System for Award Management (SAM). Registering with SAM is also required. All applicants applying for VAWA and SASP funds must obtain and maintain a current registration with the SAM. The SAM stores general information about federal financial assistance applicants, recipients, and subrecipients. You should first verify whether or not your agency already is registered with the SAM. Applicants must update or renew with the SAM at least once a year to maintain an active status.

Equal Treatment For Faith-Based Organizations. The Equal Treatment Regulation, codified at 28 C.F.R. Part 38, ensures that no organization will be discriminated against in a U.S. Department of Justice (DOJ) funded program on the basis of religion and that services are available to all regardless of religion. This regulation ensures a level playing field for the participation of faith-based organizations as well as other community organizations in VAWA or SASP-funded programs by:
• Prohibiting discrimination for or against an organization on the basis of religion, religious belief, or religious character in the administration or distribution of federal funds;

• Allowing a religious organization that participates in the SASP program to retain its independence and continue to carry out its mission, provided that direct federal funds do not support any inherently religious activities. While inherently religious activities, such as worship, or religious instruction, are permissible, they must be separate in time or place from the funded program, and participation in such activities by individuals receiving services must be voluntary;

• Clarifying that faith-based organizations can use space in their facilities to provide SASP-funded services without removing religious art, icons, scriptures, or other religious symbols; and

• Ensuring that no organization that receives SASP funds can discriminate against a program beneficiary, or beneficiary, on the basis of religion or religious belief.

Publicity. Grantees are encouraged to inform the public and the media about the accomplishments of their programs. Responsibility for the direction of the programs should not be ascribed to the U.S. Department of Justice. Press releases or other published accounts of program activities and results must include the following statement:

“The opinions, findings, and conclusions or recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the Department of Justice or the Crime Victim and Survivor Services Division.”

In all materials publicizing or resulting from award activities, the awarding agency must be acknowledged. An acknowledgement of support shall be made through use of the following or comparable footnote:

“This project was supported by Award No.XXXXX awarded by the Office on Violence Against Women, U.S. Department of Justice and the Crime Victim and Survivor Services Division, Oregon Department of Justice.”

All publications and distribution agreements with a publisher shall include provisions giving the federal government a royalty-free, non-exclusive and irrevocable license to reproduce, publish, or otherwise use the material in any fashion it deems appropriate. Unless otherwise specified in the agreement, the Grantee may copyright any books, publications, films or other material developed or purchased as a result of grant activities. Copyrighted material will be subject to the same provisions giving the Federal Government a license as described above.

C. CVSSD Award Conditions

Demonstrates access to effective services. To ensure meaningful access to services for all victims of domestic violence and sexual assault across the State, programs must be able to appropriately respond to requests for assistance (e.g. crisis intervention, safety planning, information and referral, etc.). In addition, programs must be able to directly link victims whose needs may be beyond their expertise to the appropriate community partner agency.
Maintains good fiscal management. Agencies will be able to maintain adequate funding, expend funds according to submitted budgets, keep financial records and comply with grant reporting requirements. Agencies with deficiencies in any of the aforementioned good fiscal practices may receive conditional grants.

Maintains adequate insurance coverages. Nonprofit agencies must obtain and maintain insurance in full force throughout the duration and all warranty periods of an award period (Workers’ Compensation, Comprehensive or Commercial General Liability Insurance, Automobile Liability Insurance, and, as appropriate, Professional Liability Insurance). Agencies must obtain the insurance from insurance companies or entities that are authorized to transact the business of insurance and issue coverage in the State of Oregon and that are acceptable to DOJ CVSSD. Agencies must require and ensure that each of its subcontractors complies with these same insurance requirements.

Agencies cannot cancel, make a material change, make a reduction of limits, or not renew insurance coverage(s) without 30 days prior written notice to DOJ CVSSD.

Complies with financial, data and outcome reporting. All agencies must comply with the Federal and CVSSD reporting requirements including the timely submission of quarterly financial, common outcome measures and semi-annual narrative and statistical reports. See the Quarterly Financial Report Requirements and the Progress Report Requirements sections for a complete description of reporting requirements.

Conditional awards. All grant awards are made conditional upon the timely completion of grant award documents. Funds are not considered obligated and will not be transferred until all required grant award documents have been signed by an applicant and by the Department designee. If grant award documents are not completed by an applicant within three months of the notice to the applicant of the intended award, DOJ CVSSD has the authority to reallocate the funds awarded.

In addition, an award may be made conditionally if the grantee is not current in reporting for any previous grant award; has fewer than two full years of operational history in providing services to victims of domestic violence and sexual assault; has not fully demonstrated the ability to successfully manage any previous Fund awards; or when other circumstances exist that require a further showing of applicant’s ability to successfully manage an award.

If one or more of these conditions exist, the applicant will be notified by DOJ CVSSD that a conditional award has been issued. The award shall specify the conditions to be satisfied by the applicant and the date by which the conditions must be satisfied. Applicants who do not satisfy conditions of funding by the date specified will be contacted by their grant monitor to discuss next steps.

If a program is not operational within 60 days of the award period start date, the grantee must report to CVSSD the steps it has taken to initiate the program, the reasons for the delay, and the expected starting date. If the program is not operational within 90 days of the award period start date, CVSSD may cancel the grant.
A. Fiscal Requirements

**Financial Guide.** The *DOJ Grants Financial Guide* serves as a primary reference manual to assist grantees in fulfilling their fiduciary responsibility to safeguard grant funds and ensure funds are used for the purposes for which they were awarded. The Guide should serve as a day-to-day management tool for grantees in administering their grant programs. It is the responsibility of grantees to comply with the federal guidelines in the manual. The *DOJ Grants Financial Guide* is available online at: [https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf](https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf)

**2 C.F.R PART 200—Uniform Administrative Requirements, Cost Principles, And Audit Requirements For Federal Awards.** Grantees are also required to adhere to all applicable uniform (grant) administrative requirements, cost principles, and audit requirements set forth in 2 C.F.R. Part 200, commonly referred to as the Uniform Guidance. The Uniform Guidance can be found at [2 C.F.R. Part 200](https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf).

**Reimbursable Expense Categories (Allowable Costs).**

1. **Personnel** costs are the cost of salary/wages and personnel expenses (fringe benefits and payroll taxes). Overtime must be specifically listed and approved in the budget in order to be reimbursed. Reimbursement for taxes and benefits for overtime cannot include fixed monthly costs that do not increase with overtime pay; this generally pertains to health care benefits, but may include other taxes and benefits.

   Documentation has to be retained on site and must include copies of actual payroll reports showing the full amount paid for each employee (wages, taxes, and benefits) and signed Personnel Activity Reports (time sheets). If the employee works less than the 1.0 FTE on the SASP-funded program, the Personnel Activity Report must reflect an after-the-fact distribution of the employee’s actual time on the program and must also account for the total time for which the employee is compensated.

   **The Personnel Activity Report (time sheet) must provide a breakdown of the total time for which the employee is compensated. This includes the actual time spent on the SASP program (grant and/or match) and any other federal programs.**

   One example of documentation that satisfies the requirement for the Personnel Activity Report may include time sheets with a separate breakdown for each program. The employee should indicate on the time sheet how much time was spent each day on each of the different programs. If the requirement for submitting Personnel Activity Reports can be met within the recipient’s current management system, there is no need to establish a separate time tracking system. *Volunteer hours used for match must be tracked and approved in a similar manner.*

2. **Contractual Services** are services such as consulting, evaluation, treatment, or other grant-supported activities provided through subawards, subcontracts, or independent contractors rather than employees. Grantees must follow subaward guidelines and procurement standards described on page 21 in the *Guidance* when awarding contracts.
Federal rules limit compensation for individual consultants to $650 per 8-hour day ($81.25 per hour), plus expenses. An 8-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance of the contracted service. When the rate exceeds $650, prior approval is required from USDOJ.

If consultants are hired through a competitive bidding process, not sole source, the $650 threshold does not apply.

The documentation submitted under contractual services must clearly identify the name of the contractor, the service provided, time period of service provided, and the amount and basis of amount paid to the contractor. The requirements in this Handbook relating to expenditures are applicable to contractors as well as grantees.

Grantees must submit a copy of the subcontractor agreement with the first QFR of contractual services (unless submitted with the original application); a copy of the QFR must also be submitted if contracted services exceed $150,000. The agreement should meet the criteria stipulated in the Subcontractor Agreements section of the Handbook. The QFR for contractual services should conform to the dollar limitation, match requirements, payment procedure, and payment schedule outlined in the agreement.

3. Travel and Training include employee costs for meals, tolls, lodging, mileage, motor pool fees, commercial transportation, parking fees, registration fees, and material fees.

Travel costs are allowable as expenses by employees who are in travel status on official program-related business. These costs must be in accordance with federal, state, or grantee-approved travel policy. CVSSD follows federal travel rules as posted by the U.S. General Services Administration in determining allowable grant and match expenditures. If a grantee does not have a written travel policy, the grantee must abide by the federal travel policy. The current Federal Travel Regulation, per diem rate information, and privately owned vehicle (POV) mileage reimbursement rates are available at the GSA Web site.

Grantees must obtain prior CVSSD approval for travel out of state. CVSSD will approve out of state travel only if the travel is essential to meet the objectives of the program.

CVSSD requires that a state travel form or a form similar to the state travel form be included with the QFR and retained as documentation on site. A blank copy of the state travel reimbursement form, in Excel format, is available online at: Travel Expense Detail Sheet.

Allowable costs for conferences and training may include conference or training arrangements, publicity, registration fees, conference or training space, transportation and per diem for speakers or participants, lodging, and food and beverages subject to specific conditions cited under the Food and Beverage section.

The documentation must show the nature of the conference (i.e. title, subject) and identify the individuals for whom reimbursement is requested. The subject matter of the conference must be directly related to the VAWA or SASP program objectives. The number of individuals attending the conference should be reasonable and essential to the operation of the program. A copy of the conference agenda or brochure and conference registration forms must accompany the QFR.
Overnight lodging while attending a conference, meeting, or training should not exceed the federal lodging rates. Any lodging costs above the federal rate will not be automatically approved and reimbursed. This may result in all costs being disallowed.

Meals may not be claimed as a reimbursable expense if they are already included as part of the conference or training registration fee. Employees may receive the meal allowance under the following circumstances:

- An employee is in transit to or from a destination that requires an overnight stay.
- An employee is in transit to or from a destination and the employee must depart from the employee’s home more than two hours before the regular starting time or returns home more than two hours after the regularly scheduled end of shift.

Food and Beverage Costs. No SASP funds can be used to purchase food and/or beverages for any meeting, conference, training, or other event. The only exceptions to this restriction are stated below:

- The location of the event is not in close proximity to food establishments.
- It should be a priority to try to secure a location near reasonably priced and accessible commercial food establishments;
- If not serving food will significantly lengthen the day or necessitate extending the meeting to achieve meeting outcomes;
- A special presentation at a conference requires a plenary address where there is no other time for sustenance to be attained; and
- Other extenuating circumstances which necessitate the provision of food.

These food and beverage restrictions do not apply to:

- Water provided at NO cost (the restriction does apply to any and all other refreshments, regardless of the size or nature of the meeting or event); and
- Direct payment of per diem amounts to individuals in a travel status under your organization’s travel policy.

Any exceptions to the purchase of food and/or beverages for any meeting, conference, training, or other event due to the circumstances outlined above require prior approval from CVSSD. If an exception is approved by CVSSD, the following restrictions will apply:

- Only one refreshment break a day is allowable and grantees are strongly advised to eliminate all refreshment breaks and breakfast;
- The cost of a refreshment break may not exceed 11.5% of the General Services Administration (GSA) Meals and Incidental Expenses (M&IE) rate for the locality; and
- Any meal provided must stay at or below 150% of the applicable per diem rate, including any hotel service costs. Grantees are strongly encouraged to stay at or below 100% of the applicable per diem rate.

Grantees are subject to monitoring of adherence to the food and beverage policy. Grantees should maintain all necessary documentation to support any conference costs, or food and beverage expenses if prior approval granted by CVSSD. Grantees are encouraged to identify alternative training methods, such as webinars and teleconferences, to acquire lower cost locations and venues, and to avoid the appearance of extravagant spending.

4. Office Supplies are items that have a useful life of less than one year such as paper, pens, printer supplies, software and computer supplies, small equipment, etc. Supplies that have a
useful life of more than one year and have a value greater than the organization’s capitalization limit are considered Capital Outlay.

5. **Postage** includes mailing costs, exclusive of leased postage meter costs which would be included under Equipment Rental.

6. **Printing and Copying** includes internal and external costs for printing and copying, exclusive of leased copy machine costs which would be included under Equipment Rental.

7. **Communication** includes costs for land lines, long distance and toll-free telephone services, cell phones, pagers, Internet connections, and other costs related to telephonic or electronic communication.

8. **Equipment Rental** includes costs for renting or leasing equipment such as postage meters, copier machine usage and maintenance, etc.

9. **Rent and Space Costs** includes rent (office space, training space, storage space, etc.), utilities, janitorial, and other maintenance and operation costs that are not included in the rent costs and do not extend beyond the life of the award. The documentation retained on site should identify each location for which rent is paid and the basis for the amount requested. The basis for determining the rent cost should include a calculation of the cost per square foot, and a justification of the total program-supported square footage (FTE, actual utilization, etc.).

10. **Emergency Services** includes all types of emergency financial assistance provided to program beneficiaries including emergency food, clothing, transportation, rent and hotel costs, and some medical, legal and counseling costs, etc. All emergency services must be directly related to the victimization. No funds may be provided directly to a client, but rather must be issued to a third party on behalf of a client. Gift cards are acceptable under very specific circumstances and only if the Grantee has a written Gift Card policy. Documentation supporting each emergency services payment must be retained on site.

11. **Capital Outlay** is tangible personal property costing over an organization’s capitalization limit and having a useful life of more than one year. Equipment must be purchased from a governmental price list or through an open competitive process (refer to B. Procurement Requirements below).

   Equipment may not be transferred, sold, or disposed of during the grant period without the permission of CVSSD. After the end of the grant period, items with a current per unit fair market value of less than $5,000 may be retained by the grantee for purposes consistent with the SAPF authorized Purpose Areas, sold, or otherwise disposed of, in accordance with state procedures, with no further obligation to CVSSD.

12. **Indirect Costs** include the costs of operating and maintaining facilities, equipment, and grounds; depreciation or use allowances; and administrative salaries and supplies. These costs are usually charged to the grant as a percentage of some or all of the direct cost items in an agency’s budget; this budget is called the *indirect cost rate*. An agency must have a current federally-negotiated indirect cost rate agreement to charge indirect costs to a grant.
Agencies that have a Federally-approved indirect cost agreement may choose to charge their indirect cost rate to a SASP grant. Agencies MUST provide a current, signed federally-negotiated indirect cost rate agreement.

If an agency does not have a federally-negotiated indirect cost rate, an agency can obtain an indirect cost rate by submitting an indirect cost proposal to its cognizant federal agency and negotiating an indirect cost agreement. There are resources available on the Internet to assist in the development of an indirect cost proposal.

If an agency has never had a federally-negotiated indirect cost rate and does not wish to submit an indirect cost proposal at this time, the agency may use a de minimis rate of 10% of modified total direct costs (see below) with no additional documentation requirements. If an agency chooses to use the de minimis rate, it must do so consistently for all federal awards until such time that the agency chooses to negotiate a rate with a federal agency.

Modified Total Direct Costs (MTDC) means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first $25,000 of each sub-award (regardless of the period of performance of the sub-awards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, distorting rental costs, tuition remission, scholarships and fellowships, participant support costs (does not include emergency services) and the portion of each subaward in excess of $25,000.

13. Administrative Costs. If an agency does not have an indirect cost rate and does not want to charge 10% to all federal awards they can choose to direct charge administrative costs at any rate up to 10% of the MTDC. The MTDC is calculated the same as shown for the 10% de minimis. Typical administrative costs include the costs of operating and maintaining facilities, equipment, and grounds; depreciation or use allowances; and administrative salaries and supplies. A fixed percentage of administrative costs may be charged the SASP-funded projects as long as the agency has a Cost Allocation Plan (CAP). Although there are different methodologies for allocating costs, applicants must have a system in place to equitably distribute costs to all programs. Additionally, time distribution records must reflect an after-the-fact determination of the actual activity of each employee. Consideration in determining an appropriate base for allocating costs may include the relative benefits received, the materiality of the cost, and the amount of time and cost to perform the allocation. If an agency does not have a CAP, there are resources available on the Internet to assist in the development of an acceptable CAP.

<table>
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<tr>
<th>Grantees may:</th>
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<tbody>
<tr>
<td>1) use a federally-approved indirect cost rate;</td>
</tr>
<tr>
<td>2) use a 10% de minimis rate of the modified total direct costs if the organization has never had a federally-approved indirect cost rate; or</td>
</tr>
<tr>
<td>3) charge direct administrative costs up to 10% of the modified total direct costs.</td>
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</table>

Grantees may choose to waive administrative and indirect costs.

14. Other Costs are expenses that do not readily fit into any of the other budget categories.

Program Income. Program Income is gross income received by the Grantee that is directly generated by performing program service activities for a fee that are typically paid for by the recipient of the service or by a third party (i.e. insurance provider). Program income may be
related to grant-supported activity or earned as a result of activities related to a federal award, in whole or in part, during the period of performance, which is typically the award period. Examples of program income include, but are not limited to, event registration and tuition fees, reimbursable costs for counseling, reimbursable costs for health advocacy, etc.

- Grantees may not generate program income on CVSD administered federal grant funding without prior approval from CVSD.
- Program income funds are subject to the same allowances and restrictions as the federal grant on which the funds are earned.
- Program income is subject to the same terms and conditions under the VOCA Grant Agreement.


Unless specifically identified in the grant agreement, program income does not include interest on grant funds; rebates, credits, discounts, and refunds; or taxes, special assessments, levies, fines, and other such revenues raised by a grantee or subgrantee. Fines as a result of law enforcement activities are not considered program income.

*If you encounter a situation in which program income may be generated please contact your CVSSD Fund Coordinator.*

**B. Procurement Requirements**

Federal requirements state that “all procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, open and free competition.” These requirements apply to all procurements, including, but not limited to, procurements for goods, services, and equipment. Grantees shall follow their own established procurement procedures and regulations, provided they minimally adhere to applicable federal and state guidelines and standards. If a grantee’s established procurement procedures are less competitive than the federal requirements, the grantee must adhere to the following more competitive procurement requirements:

- For small procurements of $3,500 or less, grantees may solicit goods or services in any manner deemed practical or convenient. A procurement may not be artificially divided or fragmented so as to constitute a small procurement.
- For procurements exceeding $3,500 but not exceeding $150,000, grantees must solicit quotes or bids from at least three sources.
- For procurements over $150,000, grantees must formally advertise the proposed procurement through a competitive bid process.

Grantees must follow the threshold limitations established in their own procurement procedures if their internal procedures are more restrictive than the federal threshold.

Grantees must submit all bids over $150,000 that involve the use of federal or matching funds to DOJ/CVSSD for review and approval prior to their issuance. Interagency agreements between units of government are excluded from this provision.
**Sole Source Procurement.** In rare and unusual circumstances it may be necessary to waive the competitive bid process and utilize a sole source, noncompetitive procurement. Grantees may make the determination that competition is not feasible if one of the following circumstances exists:

- The item or service is available only from a single source.
- A public exigency or emergency will not permit a delay resulting from a competitive solicitation; or if it can be shown unequivocally that desired time frames for delivery must be met or the entire program will suffer as a direct result of the delay.
- After solicitation of a number of sources, competition is considered inadequate.

If sole source procurement is pursued, documentation reflecting actions taken and the position of the grantee is required. A justification statement for all sole source contracting should include:

- A brief description of the program, the amount to be designated for the sole source procurement, and the purpose of the contract.
- Explanation of why it is necessary to contract in a noncompetitive manner by providing supporting information as identified below in the applicable section(s):
  - If the item or service is available only from one source, describe the contractor’s expertise related to the current program (knowledge of program management, responsiveness, knowledge of the program, experience of contractor personnel), the uniqueness of items to be procured from the contractor (these services or items are only available from a single contractor), and any additional information that would support the case.
  - If a public exigency or emergency will not permit a delay resulting from a competitive solicitation, describe when the contractual coverage is required, the impact on the program if deadline dates are not met, how long it would take an alternate contractor to reach the same level of competence, and any additional information that would support the case.
  - If competition is determined inadequate after solicitation of a number of sources, describe the market survey, or similar effort, used to determine competition availability, and any additional information that would support the case.
- A declaration that this action is in the “best interest” of the agency.

For all sole source procurements in excess of $150,000, grantees must submit a justification statement for review and approval from DOJ/CVSSD prior to the procurement. Interagency agreements between units of government are excluded from this provision.

For more detailed information about federal procurement requirements refer to the Guidance on the Procurement Process document.

**C. Memorandums Of Understanding (MOU), Contracts and Subawards**

All formal non-financial and financial arrangements with other entities or individuals to collaborate, purchase a good or services, or accomplish a portion of a grant-funded activity, must be formalized in written and signed agreements between the parties involved.

Non-financial arrangements are formalized using a Memorandum of Understanding (MOU).
Financial arrangements are formalized using either a Subcontract or a Subaward depending on the type of purchase.

- A procurement transaction (subcontract) is needed when grant funds will be used to obtain *ancillary* goods or services from an outside entity (contractor) for the applicant’s own use or for project participants at the direction of the applicant (the contractor will not make participant eligibility determination and does not have the authority to make decisions regarding the delivery of services and the types of services provided).

- A subaward is needed when these grant funds will be awarded to an outside entity (subrecipient) to carry out one or more services of the grant-funded project (the subrecipient generally makes participant eligibility determination and has the authority to make decisions regarding the delivery of services and the types of services provided within the scope of the agreement).

The proper classification of a financial arrangement as a subaward or a procurement transaction at the time it is proposed is critical to ensure proper accounting for costs and compliance requirements. The following table provides some of the more important factors:

<table>
<thead>
<tr>
<th>Subaward Factors</th>
<th>Procurement Factors</th>
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<tbody>
<tr>
<td>Distributes financial assistance in the form of money or services to eligible subrecipients.</td>
<td>Provides the goods or services within its normal business operations.</td>
</tr>
<tr>
<td>Performance is measured against the objectives of the federal award.</td>
<td>Provides similar goods or services to many different purchasers.</td>
</tr>
<tr>
<td>Has responsibility for programmatic decision making.</td>
<td>Operates in a competitive environment.</td>
</tr>
<tr>
<td>Has responsibility to comply with applicable federal program requirements.</td>
<td>Not subject to the compliance requirements of the federal program.</td>
</tr>
<tr>
<td>Uses the federal funds to carry out its own program, as compared to providing goods or services for the program of the grantee.</td>
<td>Provides goods or services that are ancillary to the operation of the federal program.</td>
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</table>

A more detailed [Subrecipient and Contractor Determination Checklist](#) is available to assist Grantees in making the correct selection in these financial arrangements.

**Memorandums of Understanding (MOU).** An MOU is a written plan between two or more parties for carrying their separate activities in a coordinated and mutually beneficial manner. An MOU is generally used when there will not be an exchange of funding or resources but there is a need to formally document the relationship(s). An MOU generally has the following components:

- Parties of the MOU
- Background and Purpose
- General Responsibilities of all Parties
- Specific Roles and Responsibilities of Each Party
- Additional Terms and Conditions (conflict resolution, amendments, termination, etc.)
- Duration of the MOU
- Acceptance and Authorized Signatures
Procurement Transaction (Subcontract). An Independent Contractor Agreement formalizes the financial arrangement between a Grantee and a Contractor who has been selected through a competitive procurement process (unless a sole source arrangement has been justified) to provide goods or services for the Grantee.

An Independent Contractor Agreement must, at a minimum, include (a detailed description of each element is available at: https://justice.oregon.gov/crime-victims/pdf/cvsd_subcontract_elements.pdf):

- Parties to the Agreement
- Term of the Agreement
- Scope of Work and Deliverables
- Contractor Compensation
- Independent Contractor Relationship
- Representations and Warranties
- Indemnification
- Confidentiality
- Insurance Requirements
- Amendments
- Signature of Authorized Representatives

All subcontractor agreements must be submitted to DOJ/CVSSD when fully executed and no subcontractor payments will be issued if a subcontractor agreement has not been received by DOJ/CVSSD.

The written agreement may not affect the grantee’s overall responsibility for the duration of the SASP-funded program and accountability to DOJ/CVSSD. The grantee is responsible for monitoring the subcontractor and determining that all fiscal and programmatic responsibilities are fulfilled.

Subawards. An Subaward Agreement formalizes the financial arrangement between a Grantee and a Subrecipient for the purpose of carrying out a part of the grant-funded activities. A sample of a VOCA subaward agreement is available at (minor revisions would be required to adapt for a Subaward using SASP funding): https://justice.oregon.gov/crime-victims/pdf/cvsd_subaward_elements.pdf

None of the program activities supported by SASP funds may be subawarded to another organization without specific prior approval from DOJ/CVSSD. Where the intention to make subawards is made known at the time of application, the approval may be considered given, if these activities are funded as proposed.

D. Request for Amendment Requirements

An amendment request is used to request programmatic and/or financial changes associated with a grant award as they occur during the grant cycle. Consider the following when requesting an amendment:
At no time may a program or budget modification change the scope of the original grant agreement.
Funds may only be moved and spent within the scope of the approved services.
Budget revisions do not change the total amount of funding available for the grant.
If a grantee determines that any modification of the approved budget or the extension of a grant period is necessary, a request should be made in E-Grants using the “Amendment Request” page.

The grantee must obtain approval from CVSSD for any amendment requests prior to the change being implemented. All amendment requests must be received at least 45 days prior to the end of the award period to be considered during the final quarter of a grant award.
Requests submitted after the project end date or those that would require retroactive approval shall be denied, unless an exception is granted for extenuating circumstances.
CVSSD will review each amendment request and will approve on a case-by-case basis.

Budget Amendments. A budget amendment request is required for any of the following circumstances:

- Redirection of funds in or out of the Personnel category;* OR
- Movement of funds that totals more than $1,000 in the Services and Supplies or Other Services categories; OR
- Movement of funds to any unbudgeted category; OR
- Extension of the project period.

* Budget category is defined as being either Personnel, Services and Supplies or Other Services and include the individual budget line items contained within.

Budget Amendment Documentation. The following information must be submitted when completing a formal budget amendment request:

- A completed Amendment Request page in E-Grants;
- A completed Budget Amendment Request form.

SASP Budget Amendment Request Forms can be downloaded from the Amendment Request page in E-Grants and must be uploaded in the Form/Document Upload section on the Amendment Request page once completed.

If approved, CVSSD staff will make the requested changes to the budget in the E-Grants system and the Grantee will be notified of the approval via a system notification in E-Grants.

Once approved, all subsequent FRs will automatically contain the amended grant budget.
Grantees will not be able to submit FRs while an amendment request is in process.
E. Program And Fiscal Monitoring

CVSSD monitors each grant to assure the grantee is operating the project as agreed, that the grantee is working towards its objectives, and that the grantee is following appropriate federal fiscal procedures. CVSSD monitoring includes financial and administrative risk assessments, one or more financial report verifications, policy and procedure reviews, and on-site visits. The process flow chart displayed on the right is available here.

After reasonable notice and as often as CVSSD may deem necessary during the grant award period, CVSSD may perform program and fiscal monitoring activities. Monitoring may be conducted on-site and may include review of program and fiscal records, policies and procedures, meetings with sub-recipients, program stakeholders, and/or any staff directly or indirectly involved in the performance of the award program. Monitoring visits are intended to ensure compliance with award and fiscal requirements, to provide technical assistance, to offer program development guidance, and for observation of program activities.

F. Suspension or Termination of Funding

CVSSD may suspend funding in whole or in part, terminate funding, or impose another sanction on a VAWA or SASP subrecipient for any of the following reasons:

- Grantee fails to make satisfactory progress toward the goals and objectives set forth in the application.
- Grantee fails to adhere to the requirements and the terms and conditions of the grant award.
- Grantee proposes or implements substantial plan changes to the extent that, if originally submitted, the application would not have been selected or approved.
Grantee fails to submit the required financial, or program reports, or to resolve financial, program, or audit issues.

Grantee institutes or has instituted against it insolvency, receivership, or bankruptcy proceedings, makes an assignment for the benefit of creditors, or ceases doing business on a regular basis.

Grantee fails to comply substantially with any other applicable federal or state statute, regulation, or guideline.

Before imposing sanctions, CVSSD will provide reasonable notice to the grantee of its intent to impose sanctions and will attempt to resolve the problem informally.

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Section V – REPORTING REQUIREMENTS

A. Financial Reports

Financial Report (FR). CVSSD requires accurate and clear expenditures that follow the approved budget prior to reimbursement. CVSSD operates funding for the SASP Grant on a reimbursement basis, meaning that grant funds are paid to grantee agencies after expenditures have been made. Payments to grantees are made when CVSSD receives a quarterly Financial Report (FR). The FRs must be accompanied by the required quarterly, semi-annual and annual progress reports (see Progress Report Requirements).

- CVSSD reimburses only actual and allowable expenditures for goods and services purchased during the grant period.
- Expenditures must be reported in the quarter in which the expenses were incurred.
- Expenditures should be reported for actual approved and incurred expenses, as opposed to dividing the total amount of the grant into equal requests for reimbursement for the length of the grant. While this is a convenient method of requesting payment it may not necessarily accurately represent the expenditures charged to a grant.
- All expenditures must coincide with the current approved budget submitted, which will be one of the following:
  - the original budget submitted with the grant application through E-Grants;
  - an amended budget submitted through E-Grants;
- CVSSD does not reimburse items that are not in the approved budget.
- CVSSD reimburses expenses quarterly unless otherwise agreed between CVSSD and the grantee.
- FRs submitted without the accompanying required quarterly, semi-annual report and annual reports will not be processed for reimbursement until all reports have been submitted and reviewed.
- It is the responsibility of the grantee to respond to all requests for modifications or information made by DOJ CVSSD staff in a timely manner. Failure to comply will delay payment.
- Grantees may not obligate funds, order goods, enter into contracts, or request purchase orders prior to the start of the grant period.
- Reimbursement payments are generally processed daily, but may take up to two weeks.
• FRs may be submitted in E-Grants by organization members with the role of Authorized Official, Agency Administrator, or Financial Officer. It is the responsibility of the grantee agency to ensure that only those organization members authorized to submit a FR do so.
• CVSSD will hold a grantee accountable for any overpayment, audit disallowances, or any other breach of grant agreement that results in a debt owed to the federal government.

Financial Reports in CVSSD E-Grants. The E-Grants FR will show page errors if any of the following is entered:
• Total costs in the Personnel category (Salary + Personnel Expenses) in excess of the budgeted amount for the Personnel category.
• Unbudgeted costs totaling more than $1,000 in the Services and Supplies and Other Costs categories.
• Costs in any unbudgeted subcategory.

It is the responsibility of the grantee to adhere to the approved budget as referenced in the grant agreement, or to request a budget amendment.

Cash or Accrual Basis. Agencies may complete FRs based on either accrual or cash principles. Cash basis is the method of reporting revenues and expenses when cash is actually received or paid out. Accrual basis is the method of recording revenues in the period in which they are earned, regardless of when cash is received, and reporting expenses in the period when the charges are incurred, regardless of when payment is made.


<table>
<thead>
<tr>
<th>Quarter</th>
<th>Due Date</th>
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<tbody>
<tr>
<td>January 1 - March 31</td>
<td>April 30</td>
</tr>
<tr>
<td>April 1 - June 30</td>
<td>July 20</td>
</tr>
<tr>
<td>July 1 - September 30</td>
<td>October 31</td>
</tr>
<tr>
<td>October 1 - December 31</td>
<td>January 31</td>
</tr>
</tbody>
</table>

Deobligated Funds. If funds are not expended by the end of the grant period, DOJ CVSSD will deobligate the remaining funds from the grantee. A letter will be sent to the grantee informing the grantee that funds have been deobligated and the grant is closed.

B. Progress Reports

Grantees must submit progress reports to CVSSD. Progress reports have the following purposes:
• To determine if the grantee is implementing the program as agreed.
• To determine if the grantee is making progress towards meeting its performance measures.
• To determine if the activities performed by the grantee are linked to the specific outcomes of the program.
• To allow the grantee to present information on any problem encountered (e.g., what were they, how they impacted the program, and how were they resolved).
• To develop data for statewide planning.
• To provide/present information to the Oregon Attorney General’s Office, the Legislature, the Office on Violence Against Women (OVW) and Congress.
To help other agencies that might undertake a similar program.

To justify continued funding of the SASP programs.

CVSSD will not issue financial reimbursements if any progress report is outstanding or incomplete.

The grantee must receive prior written approval from CVSSD to extend a progress report requirement past its due date. It is the full responsibility of the grantee to ensure that progress reports are received by CVSSD by the due date.

**Quarterly Reporting of Client Feedback on Common Outcome Measures:** All SASP grant recipients are required to collect feedback on services provided using the prescribed common outcome measures listed below. The client feedback will not be tied to the specific, SASP-funded project, but rather to all victim services provided by the program. Grantees are only obligated to survey appropriate clients, and should specify which clients will be surveyed via an internal, agency policy. For example, no clients in crisis would be appropriate, whereas support group clients, clients exiting shelter, or clients receiving follow-up services may be more appropriate. The forms are due quarterly, at the same time as the FRs. Programs are expected to have at least a 10% response rate from clients who receive surveys with the goal of a 90% positive response rate.

Programs may use Client Feedback Forms already in use in their agency; however, all programs are required to include the appropriate outcome measures described below.

Programs serving primarily adult sexual assault victims are required to report client responses collected by one of three types of services provided: (1) clients receiving shelter services; (2) clients receiving support group services; and (3) clients receiving non-shelter based advocacy and other services. **Programs do not have to collect evaluations from all three groups.**

The three common outcome measures are:

- *The program provided me with services that helped me make informed choices about my situation.* (This CVSSD Common Outcome Measure is applicable to all program types and must be stated exactly as shown).
- *After working with this agency, I have some new ideas about how to stay safe.*
- *After working with this agency, I know more about resources that may be available, including how to access them.*

Programs serving primarily victims of child sexual abuse are required to report client responses on the following common outcome measures:

- *The program provided me with services that helped me make informed choices about my situation.*” (This CVSSD Common Outcome Measure is applicable to all program types and must be stated exactly as shown).
- *The program staff treated my family with sensitivity and respect.*
- *The program staff was supportive in helping me to access recommended treatment services for my child and family.*
**Semi-Annual Narrative Reporting.** Each Grantee must submit a semi-annual narrative report on grant-funded activities and Goals, Objectives and Performance Measures. CVSSD E-Grants has a specific reporting form for submission of progress on the goals, objectives, output measures and outcome measures.

**Note:** If a grant receives a time extension, a final narrative and goals, objectives and performance measure report covering the duration of the extension must be submitted within 30 days of the grant closing.

**Annual (Muskie) Progress Report.** SASP requires programs to report on the number of primary victims served and partially served, the number of victims seeking services who could not be served, the number of secondary victims served, demographic data for primary victims served and partially served, the number services provided to primary victims, informational materials developed or distributed, the number of hotline, walk-in and web-based contacts, the number of outreach activities, and the number of temporary and final protection orders requested and granted. Instructions and reporting tools for completing the SASP Annual Progress Report can be accessed at: [http://muskie.usm.maine.edu/vawamei/saspformulaform.htm](http://muskie.usm.maine.edu/vawamei/saspformulaform.htm).

Grantees must carefully consider who their SASP grant clients are in order to accurately collect and report relevant data. In general, clients are “identifiable individuals who receive direct services by the staff resources reflected in the SASP grant budget.”

**Progress Report Due Dates.** Reports should include activities and outcomes, as well as cumulative information to date. For the SASP program, the reports are due on the following dates:

**Quarterly**
- January 1 - March 31: Due Date April 30
- April 1 - June 30: Due Date July 20
- July 1 - September 30: Due Date October 31
- October 1 - December 31: Due Date January 31

**Semi-Annual**
- January 1 – June 30: Due Date July 20
- July 1 – December 31: Due Date January 31

**Annual**
- January 1 – December 31: Due Date January 31