

SUHEYLA LASKY: My name is Suheyyla Lasky. Welcome. I am one of the team leads with the Grants Financial Management Division. And I am accompanied by our Associate Director Erin Lorah, who is also on the line with us today. And she is here to help answer any question that you have during the presentation. So, I encourage everybody, please go ahead throughout the presentation, no need to wait until we have a break, put your questions in the chat box and Erin will provide a live response. And we do have sections throughout the presentation where we take a small pause and we go through all of the questions and answers that have come in through that time that I'm presenting. So, you don't have to monitor the chat box, we will make sure that we respond to your questions and go through everything throughout the presentation. So welcome.

I am happy to be here to talk to everybody about the incredibly engaging and interesting topic that is financial management of your grants. So today, we will start with actually describing a little bit about our division. Like I said, we're the Grants Financial Management Division. And I know that a lot of people that are on the line right now that you guys are very familiar with who we are and what we do. But for any new staff, we are involved in so many aspects of the life cycle of the grant. We are involved in the pre-award risk assessments and that's that portion prior to receiving the funds that we assess any potential risk of all applicants. We also review and approve budgets, which is one of the biggest things that we do every year. And we just want to remind everybody that we have a small team. We are small and mighty. And we are currently reviewing all of our budgets. If you have any questions about your specific budget, if you can hold off that question and send it to the help desk, Erin is here to answer any general financial questions related to the presentation. But if you have a specific question about your award, that might be better addressed the help desk, and I have that information in the next slide.

We also provide technical assistance and training. And that looks like the help desk. And also, what we're doing right now and sometimes some specific one-on-one training. We also have a part in the grant award modification process, and that's when you make any changes to your award, like extending the period of performance or making a modification to your budget. We're also involved in the conference cost request process. We helped to develop financial grants administration policy for the Office on Violence Against Women. So, if everybody remembers when they sent out the new regulations for 2 CFR Part 200, our division was involved in interpreting the policy and updating everything and, you know, we have a very, very large part in that process. We are also involved in the Office of Inspector General audit resolution process. And we're also involved in the closeout of your awards.

So, as you can see, we're here from the beginning to the end. Our division has a part in everything. Okay. So here are our help desks. The first one listed here is the Grants

Financial Management Division Help Desk. And that's our team. We have a financial analyst who is assigned every day, every work day to responding to inquiries from recipients, internal, external, anybody who has a financial question, they usually email the help desk. And so, you get a response within 24 hours. We really love this help desk and we encourage our grantees to contact them if they have financial questions and that's because you'll reach an actual financial analyst when you contact the help desk rather than a call center. So, you'll get a comprehensive, accurate response for your questions on this help desk.

The next one that you see listed here is the JustGrants Help Desk. And this one's specific for the Office on Violence Against Women, for our office. So, if you have technical questions when you are working with JustGrants, contact this help desk instead of the big help desk if you have a technical issue because this is run by a few of our staff internally, who are really good at follow-up and, you know, helping you out with your questions and getting you--getting you the assistance you need. And the last one that we have here is the ASAP Help Desk and that is our payment system. It stands for Automated Standard Application of Payments. So, this one is the system where you draw down on your funds for your award. So, if you have technical questions about the system like, "My payment request isn't going through, what's going on?" or, "I'm trying to enroll my new staff. Why isn't this working?" Contact their help desk and they'll be able to assist you. Now onto the really interesting part, administrative requirements. So as everybody knows when you receive federal funds, there are strings that are attached to the funds. And that looks like your award conditions and all other types of federal regulations and anything else that is--that you need to make sure you're aware of and that you're following so that you are properly administering these funds. So, we want to make sure that our grantees are familiar with all of these regulations, the ones that apply to how you spend your funds. And the first one that we wanted to go over is the uniform administrative requirements, cost principles, and audit requirements.

So, I know that a lot of the people that are on the line right now have been with their organizations for a very long time and you probably remember the old circulars, and then they changed over in 2015 to the new regulations where they combined everything together, all of the different rules and regulations into this one giant set of administrative requirements. So, this is the big set of regulations, one I describe and I like to think of it as the one that--the most broad set of regulations that applies to all recipients of federal funds. And so, you--it's going to not be very specific for your DOJ grant, but it is going to lay out all of the standards for costs, you know, what the administrative requirements are, everybody's audit requirements. It really sets out how you should be administering your award, and also information for the federal agency. But all of the policy that we develop internally, is all based off of these federal regulations. So, everybody should be familiar with those regulations, the really broad set. And then we get a little bit more

specific and we end up with the DOJ Financial Guide. And it is definitely specific for DOJ--the Department of Justice recipients, and it's going to list out all different types of policies and, you know, how we interpret some of the federal regulations. It is very specific to our recipients, so it is important that you're also familiar with this set of federal regulations. So, for example, let's say that you're at the end of your award and you need to figure out how to dispose of some of your equipment. There is an entire section in the DOJ Financial Guide about disposition of equipment items. So that's just an example, there's a ton of wonderful, interesting, great information in this guide. But definitely this is another one you want to be familiar with.

And the last one here is the program solicitation. And this one's a specific set of regulations or information that is very specific to your project and your program. And it might lay out additional requirements or additional allowability of expenses that are related to the scope of the project or statutory requirements on how your project should be formed. This is definitely one of the other regulations and legal authorities that you should be familiar with as well.

Going back to the topic of the uniform guidance, there is an entire section that is incredibly applicable for the way that you would develop your budget and how you approach each of the costs that you are incurring for your project and this is the section on the standards of costs. What makes up a cost that I can apply towards this grant to make sure that it's allowable, that it's reasonable, and necessary, et cetera. We're going to go through each of these bullets individually because it's important to remember that there are multiple considerations for knowing what the standard of that cost is. The first one is whether or not the cost is allowable. And for these examples, we'll actually use the cost of a laptop for an advocate just to go through this so that it makes a little bit of sense.

The first one is allowable and we need to know whether or not this laptop is an allowable cost. We're going to think, we remember the set of regulations that we talked about in the beginning. It's allowable under the uniform guidance, right? It's allowable under the DOJ Financial Guide, right? And it's an allowable cost within the program solicitation. So, I know that this is an allowable cost, give it a checkmark, and keep going through the list. Next, is the cost reasonable? That one, you would use a prudent person test. So, let's say that it's a \$1,200 laptop. That sounds reasonable to me as a prudent person. It's not listed at \$5,000 with every single bell and whistle that's available. It's exactly what the advocate needs to be able to perform the duties of their job. Check.

Next, is the cost of that laptop necessary and allocable? This one is a little bit more subjective, whether or not it's necessary, and you're going to have to look at what is needed to carry out the golden objectives of this project. If your project is for the

advocate to have a case load to serve victims and they needed to put in the case information into the computer, to keep track of for their clients, I would say that's necessary. It is necessary for that person to be able to perform the duties of their job under this grant? Okay. Is it allocable? Does that advocate work 100% of their time on this grant? Or are they 50% of their time on this grant? If they're a hundred percent, then a hundred percent of the cost of that laptop can be charged the grant. If they're 50% on the grant, then 50% of that cost can be charged to the grant. Those are the top three bullets are the big ones that we have to consider in our brains.

Every single time we look at a budget or we're asked whether or not a cost can be covered under a grant, we have to take all of those three items or those three bullets into consideration, to determine the standard of the cost. There are other pieces and components that should be considered as well and that is whether or not it's claimed against only one award, whether it's permissible under state and federal laws and regulations. Is there a specific state law that prohibits that type of expense, whether it's treated consistently between federal and non-federal funds? So, for example, we get a lot of questions especially from newer grantees about their fringe benefits rate and whether or not they can charge certain fringe benefits under the OVW grant that they-- that they normally provide to their employees. We remind them that as long as it's something that's treated consistently between federal and non-federal funding, then that can be charged under this grant as well.

Similar question we get a lot for travel. You want one travel policy. You do not want a travel policy for federal funding and a travel policy for non-federal funding, just one travel policy across the board. And you also cannot shift your costs to either overcome funding deficiencies or to avoid the restrictions or award terms on another award. Let's say that you have an award that doesn't allow you to charge a portion of rent, you would not be able to take that award portion of rent and charge it to this grant because there was a restriction on your other award. So, when we developed this training a few years back, we were seeing a trend of a lot of audit findings. And we thought to ourselves, "Okay, so since this is at the beginning of the award when we do this presentation, what is the most effective information that we can convey to our grantees across the board on how to start things off on the right foot and hopefully avoid these audit findings?"

Our leadership goes through so many different audits and financial monitoring visits to try to find out what are the common threads? What are the most common findings? How can we help prepare our grantees best to start things off right and hopefully avoid these findings? We want to really shape our presentation around getting started on the right foot. To give some context what these audits and financial monitoring visits, what they are is that they are reviews by either internal if you hire a single auditor or if you have a financial monitoring visit or if you're audited by the Office of Inspector General, they are reviews of your organization where they really assess the entire operation of your

organization. They're looking at your policies and procedures for both like your accounting systems and your organizational policies and procedures. They're looking at your approved budgets and actual costs. They're testing costs to make sure that you're following your policies and procedures, and that you have all of the supporting documentation for everything. And they're also looking to determine if there's any excess cash on hand.

What are the most common findings that they come up with? And the biggest one, the one that is so common amongst everybody, make sure you have it within your records that it's an easy thing to be able to avoid, but it is the lack of documentation, and that's where there's missing or incomplete invoices, contracts, receipts, anything that supports the cost that you are charging to the grant. The next one is inadequate or no time sheets. And if you can imagine that, you know, the percentage of your budget that is labor-driven, those costs whether it's in personnel and fringe alone, a lot of our grantees have at least 40% to 60% of their budget is in those two categories. If you are not maintaining adequate timesheets to support that time that you're charging to the grant, if you're audited and they don't see those timesheets, then just imagine the amount of money that you have to be returning for not having the proper supporting documentation.

Another finding is that the expenditures on your financial report, that they don't match what's in your records, like in your general ledger and your accounting system, that there is no documented or inadequate policies and procedures, that there is a movement of funds more than 10% without the budget modification approval. And we'll go over that towards the end of this presentation. And as you're applying that a lot of grantees supplied the wrong indirect costs rate agreement to the wrong period, that's a pretty common one too. If you have to make sure that it's accurate.

We talked about what the audits look like. We talked about what the most common findings are. Now we're talking about what those findings could result in. The biggest one is generally that the unallowable costs are required to be repaid back to the Department of Justice. I cannot stress this enough. We don't want this money back. We want our grantees to be able to do good things in their community and their states, for their coalition partners. We want this money to stay with your organizations and not have to be returned to our office. That's one of the saddest things is when the money comes back to us because of one of those findings that we talked about on the previous slide.

Another thing that could happen is that the organization can be placed on the high-risk list for the Department of Justice. And then there's a hold on funds. And in order for you to receive funds, it's on a reimbursement basis that requires you to submit your general ledger. And we have to test costs. It's a long process to get your funds and it's a lot of

work for you. It's a lot of work for us. Neither of us like it, so please don't end up on the high-risk list. And also, there is potentially negative future funding decisions that are associated with some of the findings. And last is that it could lead to an OIG investigation if related to what the auditors find that there is a suspicion of criminal activity, or fraud, waste, or abuse. That's the really big bad one but that's not very common but it's also out there.

I am going to pause to see if there are any questions that have come through. Erin?

ERIN LORAH: We don't have any questions. But I did just kind of want to stress a little bit more about asking questions. If you don't feel comfortable putting them in the chat, you can send me a chat directly and I can just re-type it and put the answers in here. If you have a question, most likely someone else has that question, and Suheylya and I love talking, and we will talk for the next two and a half, three hours, but making this as a conversation, because it does drive more questions once the questions starts. So please don't think a question is stupid. No question is stupid. And we are here to help you. So ask away.

SUHEYLA LASKY: Thank you, Erin. And also, everybody on the line, just remember that Erin is not doing anything when no questions come through. So, keep her busy. Just kidding.

Our number one objective really is to help make sure our grantees are starting off on the right foot. And that starts with setting up your award and making sure that you have everything in there that is needed to keep everything nice and happy for your auditors. Make sure that your policies and procedures, that they actually list out what you need to do, the steps you need to take when you receive an award. It should talk about creating a grant file, whether or not that's hard or electronic, it's up to you, reviewing the award conditions, setting up new cost centers in your accounting system. Shout out to my financial folks on the line. Setting up tracking a budgeted versus actual expenditures and requiring source documentation. Go through each of these individually.

Creating a grant file, what does that look like? It looks like what somebody, if you leave the organization and a new person comes in that they know exactly what's going on with this grant, and they can just pick up and keep on going with it. Copy of the application, signed award document, any Memorandums of Understanding that you have in place, your approved budget, the most recently approved one too, any correspondence that is pertinent to the grant, something with your grant manager, with our office, anything, and your financial reports. And what we recommend doing if, let's say you have a hard copy system, that with your financial report that you've stapled to it a copy of the general ledger that you used to base the figures that you reported on for that quarter.

Carefully review all terms and conditions on your award. So, this is just a reminder for everybody that there's lots of conditions, these are parts of those strings that are attached. It's like--just like with any contracts, you know, this is the, read the fine print portion of it. Make sure you know what you are signing for. And what other conditions are in place. This one for example is saying that your budget was approved conditionally, so you received your award, we're still reviewing your budget, thank you for your patience, you'll have access up to \$20,000 for operational costs and then, you know, in the meantime, we're working on reviewing and approving your budget. There is one line in here as well, it's in the center, "Any obligations or expenditures incurred by the recipient prior to the budget being approved are made at the recipient's own risk." So that just means that if during the time that your budget isn't approved, that you do expend funds, and those expenses are not included in your final approved budget, then they are not reimbursable. That's just what that means. But once your budget is approved, you can go back to day one of your award period of performance and draw down on the funds that you expended, that are also approved in your budget.

So, you want to set up a process in your--either if in your financial accounting system or in excel, whatever works for your organization, you want to set up a system where you can track what was budgeted versus what was actually expended. This is something that you're going to do after your budget is approved. And you want to reconcile this on a monthly basis, but it really helps you project where you're headed and do you have enough money in certain categories? What does our future expenditures look like with this--with this grant and this budget? So, here's just an example what this might look like. And as you can see, we highlighted two of the lines in red. One was travel and it looks like it is an outlier based off of all the other numbers because it's quite a bit higher than everything else at 21.1% of the budget amount has been expended at this point. And the other number that's highlighted is the consulting contracts at 2.8%. It is significantly lower than the other numbers. So, they are only budgeting or only spending so far about 2.8 of what they budgeted. This is just an example here of how this can be a tool that is used to help you project what your expenditures are you in line to hit your numbers by the end of the award period, are you significantly over, are you significantly under. And it might also just be that there's a simple reasonable explanation for it. Like let's say for example, the travel, it might be higher because you went to your new grantee orientation and brought a bunch of staff, and so you ended up spending a lot of money on the onset of the award. And then the consultants is lower because you just haven't started working with your contractors yet, because you're still in the planning phase. So there are very reasonable explanations but it's still good to track this information and project what things look like so it can prepare you to the ends of the award.

Another piece that you want to make sure that you have in your policies and procedures for setting up your award is what type of source documentation you require to be maintained within that grant file. Any timesheets, purchase orders, invoices, travel authorizations, receipts, anything that supports an expense, related to your grant, needs to be maintained within the grant file. And you don't need to submit it to us, but you do need to keep it on file.

We are going to keep moving on to talk about policies and procedures. Keep this party going. Next to lack of documentation, the next common audit finding is when organizations have incomplete, out of date, or inadequately enforced policies and procedures. So, can't stress enough how important that is. And just to kind of dive into each of those incomplete, that they just aren't comprehensive. They don't go over everything that your organization does. If it's out of date, maybe you had some quick expansion, and you haven't had time to go back and update your policies and procedures, so it's not even relevant anymore. And inadequately enforced, do you need to do more training for your staff? Are there internal controls and checks and balances that need to be put into place to make sure that people are properly enforcing their policies and procedures? Those are things that you want to ask yourself. Topics for your policies and procedures, this is not a comprehensive list, but these are general items that should be included. And that includes conflicts of interest, cost allocations, methodologies, segregation of duties, you want those checks and balances in there, internal controls, keep going through personnel and time and attendance. Procurement, record retention, conference costs, and the list--the list goes on. Again, not a comprehensive list but you should be at least covering these topics in your policies and procedures.

I know that we talked about this a second ago, but your policies and procedures must be complete and comprehensive. They need to cover all of the things that your organization does. It needs to be documented. It can't just be, "Well, this is what we usually do and, you know, everybody just follows this process." It actually has to be documented. An auditor, when they come in, they're going to look to see what you have documents then. Needs to be updated regularly, that's going to look different for every organization. What regularly means, if you have literally nothing changing, then maybe like every year, or every other year, or if you have a lot of things going on, then, much more frequently than that, but at the very least, you should have something in place where you at least assess, "Do we need to update our policies and procedures?" The answer could be no, but you have to ask your question that--ask yourself that question at the very least. And it should be relative to each organization's size and budget. Obviously, if you're a four-person operation, you're not going to use the state's policies

and procedures to model yours after. So, make sure it's relative to what your organization actually looks like.

And why is this important? It outlines all of what you do, all of the rules that your staff follows, all of the methods for your procedures. It will also help ensure that your financial system is generating accurate information. If you are following all the steps necessary, all of those internal controls, all of those checks and balances that are in place to make sure that this person is checking that person's work, then one could assume, that the financial management system has accurate information. And then that you're able to report reliable information to your funders. They all just build on each other.

In your policies and procedures, each of the different types of policies, they should also reference what specific documents are required or that will touch upon each of those processes. So, for example, in your personnel time and attendance, policies and procedures, you are definitely going to reference timesheets, that type of documentation. In your travel policies, you're going to talk about travel authorizations, receipts, so each of the policies and procedures that you have, make sure you're also saying what that source documentation associated with that procedure looks like.

Just a reminder, you don't have to submit anything to us, unless we specifically ask it from you. One of the most important elements of your policies and procedures, and how you build them, should be taking internal controls into consideration. And that is the process--these are procedures that are implemented by your organization to ensure that you have effective and efficient operations, you have reliable reporting, you're safeguarding the assets, you're complying with laws and regulations, and that there's a segregation of duties and checks and balances.

Let's take this idea of internal controls and as an example, so let's say that you might have a smaller operation, as far as human power goes, you still need to ensure that even with limited staff that you do not have the same person who opens the mail, who does write the checks, who does the financial reconciliations, and who signs off on things. You don't want one person to have control over the entire process because that is a big gap that leaves you open to the potential of fraud, waste, or abuse, because there are two sets of eyes on a process. So maybe a different person opens the mail and does the financial reconciliation from the person who writes the checks. So it's not one person doing all of that who could be potentially opening you up to fraud, waste, and abuse. Those internal controls that you write into your policies and procedures are crucial for ensuring that you are safeguarding these assets. And just still on the idea of internal controls, it is going to look different for every organization, what your internal controls are, what your checks and balances are, because all of that is relative to how

you have everything set up, what your org chart looks like, are there any people who are related within your organization? That's just something to keep in mind.

Next topic is cash management and Federal Financial Reports policies and procedures. You want to make sure that within your policies and procedures that you have an adequate system for cash management, that it minimizes the time between when you receive funds from the treasury to the time that that money leaves your account. So, most of our grantees are requesting funds on a reimbursement basis. That means that the grantee had spent the money with their own funds and then they come back and request the reimbursement from OVW for that.

If, however, your cash flow situation doesn't support that, that's okay. You can request an advance on these funds, but you cannot hold on to that money for more than 10 days. So, let's say you might need to coincide regular drawdowns with your biweekly payroll that runs. So, you draw down funds three days before you run payroll so that you have the money in your account so you can pay your staff. That's fine with me because that's within 10 days of receiving the funds that you're getting rid of the funds that are leaving your accounts.

We do also perform quarterly excess cash reviews where we compare how much you've drawn down, which is what we have in our accounting system versus how much you reported as expended on your financial reports. And we identify any significant discrepancies. So that financial report, the one that we use for the cash on hand analysis, this is a really important tool that grantees are required to submit quarterly, and they are telling the funder how much they have expended on this award up until the end of that quarter. From the beginning of the award period up until the end of the quarter that they're reporting on, how much based off of their internal accounting records, how much money has been expended on this award. I make this distinction because a lot of times grantees, they report on what they've drawn down from OVW instead of pulling the information from their internal accounting systems.

And you might ask, "Why is this such a big deal?" Well, we need to make sure that this number is coming from your accounting records, because we have access to your drawdown history in our accounting system. We don't need you to report to us what information we already have. But I don't have access to, let's say for example, your QuickBooks, and I can't get into your financial systems to see how much you're reporting as expended on this grant. That's the information we need you to report to us on, from your accounting system, how much have you expended so far. So that's what you report in line 10e of the report.

The quarterly reports are due 30 days after the end of each quarter. But then you have 120 days after the end of your award date. And that's a shift because it used to be 90 days, but a couple of years ago they bumped it to 120 days that you have for your final report. And even if you don't have an approved budget yet, you are still submitting your financial reports because you could still be spending money on the award even if you haven't gotten the approved budget yet. Because remember when we talked about you can still expend and obligate but you can only be reimbursed later for funds that are included in approved budget. So, this report, just as a reminder, it's submitted in JustGrants and it's performed by your financial manager.

Now we're going to talk about travel policies and procedures, because I feel like there are a lot of gaps in this topic or with grantee policies and procedures when it comes to this topic. So, we just wanted to talk about some of the things that you should be thinking about when you are developing your policies and procedures for travel. You need to make sure you have a documented travel policy that your staff follow and if you don't, then you need to refer to the federal travel regulations. So again, if you don't have your own travel policies, then you need to refer to GSA, General Services Administration Federal Travel Regulations. It is so vital to keep all of the supporting documentation around travel. And that might look like the travel authorization that your staff person submitted for approval prior to going on their travel event. The reimbursement form that they submitted to you after they went on travel that included all of their expenses and broke everything down, and the receipts to support those costs for anything that is required to be submitted based on your travel policies, or on the federal travel regulations.

Huge note, a copy of your credit card statement is not sufficient supporting documentation for auditors or financial monitoring. You have to keep the things that are listed here, make sure that you have them and not credit card statements. So, this is just an example and there are questions that we want our grantees to consider as they are developing or reviewing what their travel policies and procedures outline. So, they're just questions to think of.

For your approval and authorization for your staff before they go on travel, do your policies and procedures talk about when they need to receive their approval? For example, do they have to submit it to you two weeks prior to their travel? Does it talk about who approves travel requests and how is that travel request approval obtained? Is it through a routing form? Is it an electronic system? If it is, those names of those systems or the forms should be listed out in your travel policies. And what needs to be included with that request? Do they need to include a copy of an agenda so that you know that they do indeed need to be there for those periods of time? Do you need them

to submit a breakdown of their estimated costs so that your budget people know whether or not the money is actually available for them to spend for that travel event? All of these things should be things that you're thinking of that are being addressed in your travel policies for staff before they go on their travel events. Now, after their travel when they come in for reimbursement, your policy should address who is the reimbursement request submitted to for review and approval? So, your staff need to know who do they go to request their reimbursement when they come back? What do they need to submit with that reimbursement request? What types of receipts do they need to give you? What types of documentation for anything? What is required of them? It needs to be clear and your staff needs to be trained on that. And when do they have to submit it by?

For example, Erin and I, when we go on travel, we have two weeks that we have to submit our reimbursement request because they don't want those funds that are just sitting out there for this entire time for two years and then we come in and ask for reimbursement. We got two weeks to submit our request for reimbursement.

If there's any questions about travel policy, definitely drop it in the chat box so that again we can keep Erin busy. I'm kidding. She's the busiest person I know.

Next topic, personnel and time and attendance policies and procedures. Somebody did have a question earlier about time and attendance. So hopefully we address your question here and if not, drop it in the chat or if it's just looking for a sample timesheet, if you look at the bottom of the slide right here, we do have the email address for our help desk and you can just send them a quick email, ask them for a copy of the timesheet and they'll send it to you. And it's just a sample timesheet that one of our grantees sent us that appears to contain all of the required elements for a timesheet. It is not an approved timesheet that's endorsed by OVW, it is a sample timesheet that you can use as a document to review.

What do timesheets need to contain? What are the standards for timesheets? Well, that person's time and effort needs to be clearly documented on timesheets and supported with activity reports, something to attest that the activity is related to the time that they're charging on the grant. The amounts charged should match the documentation, not basing it on the budgeted amounts. So, let's say for example, the advocate is budgeted at 50% of their time on this grant but now that we're actually going through in that two-week period, they worked 53% of their time on the grant. In that case, you charge 53% of their--of their salary to the grant. If conversely, they worked 48% of their time on the grant that two-week period, then you charge 48% of their salary to the grants. You need to make sure that that timesheet for any person who charges any amount of their time

to this grant, that that timesheet accounts for the entire activity of that pay period for that employee for all funding sources. So, it's not--I've seen before where there's--where a grantee submits or, you know, sends us a copy of the timesheet and it literally just says for the two-week period they worked eight hours on the OVW grant. You--that--what is being documented for the timesheet needs to be for that entire two-week period, all of the time that they worked for all of their funding sources and of that, eight hours was for the OVW grant.

That is what proper documentation should be showing. Your policies and procedures should be updated to reflect what you require of your staff and it should be documented. And you want to have internal controls in place to assure the accuracy. And that might look like having a supervisor who has firsthand knowledge of that person's time, who can attest to it, who's signing off on it. So, some sort of internal control that's in place to assure the accuracy. And, again, if you need a copy of a sample timesheet--there's a couple different versions of it, actually. Go ahead and send us an email.

We have some examples of recording time and pay practices. So, this is just a sample of policies and procedures. As you can see, in the sample policies for recording of time, we start off talking about the policy. What is the actual policy? That is for utilizing a time recording system that is accurate, et cetera. What is the purpose of this policy? What are the definitions of what you're going to read throughout the policy? Now, pay practices policy. Again, what's the policy, the purpose, the definitions, and then the procedures, okay? So, it talks about what the pay period looks like for each week, okay? When the paychecks are issued, that each paycheck will be accompanied with a statement showing X, Y, Z and what deductions are being taken out, et cetera.

So, this is the boring stuff, right? These policies and procedures, they're not the interesting things that organizations work on. I get that. But they are the necessary things. Here is a sample timesheet. Again, this is available if you email our help desk and just request a copy of it. But, as you can see, in the golden/orange boxes at the top, in the middle, you'll see that there are various funding sources. So, you have state VOCA training, state VAWA, another state VOCA. So, you see that, at the very top, you have all of the different funding sources. And below it is where the staff identify, each day, how many hours they're working on each of those funding sources. So just as an example to support, you know, what you should be reporting--what you should be recording your time is for the entire--all of the funding sources that are--that you're working on and charging your time to for that pay period. And on the very right-hand side is just a description of the work that was performed, just to substantiate the time that you worked.

Again, this is also in the sample timesheet that we can send out to you. It is just breaking down what the budgeted amounts are for each of those funding sources, what the actual percentage of time worked on for each of those, and just keeping tally of what was earned for their sick and vacation time, et cetera. So, this is just, you know, one organization's method for tracking their staff's time. I am going to pause and see if there's any questions that came through.

ERIN LORAH: They are keeping me busy. No, actually, they are not. But it's okay. I'm here listening, learning more things. As much as Suheyla talks, we still learn new things every day in how we do our own presentations. But we did get one question in and I responded to it in the chat.

So, the question was, "Since the Federal Financial Report is quarterly, can cash be drawn month--drawn down monthly instead of waiting until after the quarter end? The amount polled would equal actual expenses for the first month of the quarter." So, my answer was that the Federal Financial Reports, the FFRs, are submitted quarterly. However, you are able to draw down from the payment system on an immediate needs basis.

So, if you need to draw down weekly to make payroll because you are a smaller coalition, you can draw them weekly. We've been working with some of our grantees to try to develop a process. And Suheyla talked about that with the policies and procedures for cash management. How often do you draw down? Is it in line--you know, are you drawing down based on your anticipated expenditures for the next month or next week? Or are you drawing down based on your actual--based off reported expenditures and your general ledgers? So, you don't have to wait to submit your request for drawdowns based on the submission of the quarterly financial report. It should be based on your need.

And then we are actually getting more questions, Suheyla. And the next one, "Was the second example an acceptable timesheet? I was confused by that one." Suheyla, will you go back to the second timesheet?

SUHEYLA LASKY: I think it was this sheet, because there's only one timesheet, but there are two pages in the timesheet. Maybe that was the confusion.

ERIN LORAH: That might have been. This timesheet is a two-parter. So the first part pulls down to this bottom piece of it. So if you do want this example, we can send it to you. It's an Excel document that pulls into that bottom information, so it's easily able to report a budget in person, see your actual costs spent to the grant program.

The next question was on timesheet. "Is it on page 38 or 39, one or the other?" And we just confirmed that it's this one timesheet. They're just on two separate slides. So, for the future--I think these are really good questions. We should put in here that this is the exact same timesheet, because now that I look at this, this second sheet would not be

sufficient. It doesn't have much of anything in here because you don't have the hours that are actually working by funding source. It's just by percentage. So, we could probably add a little bit there. And then...

SUHEYLA LASKY: I just--oh, sorry.

ERIN LORAH: Go.

SUHEYLA LASKY: I was just going to say that we don't normally include these slides in our presentation, so the confusion is a hundred percent my fault. Sorry, guys. I know it in my head that this was a continuation of the previous slide. So sorry about that, guys. Point taken. I'll fix it on my next presentation.

ERIN LORAH: And, you know, Suheyyla, we started adding these into the slide because grantees were asking, because we have examples and we wanted to speak to it a little bit more in detail, and we started to expand a lot of our new grantee orientation conversations, instead of it being, you know, this same conversation every single time. So, we started to put actual samples into our presentation, and we saw grantees enjoyed it, so--and then the next question was, "Can we draw down purely on a reimbursement basis?" And, yes, you should be drawing down on a reimbursement basis.

The Cash Management Improvement Act says you should minimize the amount of time that is from drawing down the funds until the funds go out of your banking account. We do know that some grantees might have to draw down on Friday to make payroll on Tuesday. It's not a very good example of when you're making payroll but it gives you an idea of draw down the funds from our payment system so that you can actually make the payment outside of--from your banking system instead of having to use your own funds. We know that grantees sometimes can't cover this money on their own, so with the migration to ASAP, it has given our grantees an ability to get that money a lot faster. So, if you draw down before 2:00, the funds are normally in your bank account that day. So, this is probably a good time for you to look at your policies and procedures and see how it's written down for drawing down funds as it relates to expenditures.

PARTICIPANT: I was the one that just asked about the reimbursement basis question. So, the situation that we have is there are just me and half a person doing our financial management work. And the way we have been doing it--and I'm going to admit this. I suppose it might be my own fault, but I hopefully don't--OIG doesn't come down on us. But we essentially spend the money, and then draw down at like the end of the month based on, payroll and whatever other expenses after that. So, is that okay? Because we would be essentially holding on to that money but we're holding on to it because we already spent it, not because we plan to spend it. It's already left our account and we've essentially reimbursed ourselves for that.

ERIN LORAH: Yup. You're...

SUHEYLA LASKY: That is...

ERIN LORAH: ...claiming what we want you to do.

PARTICIPANT: Okay. Okay. That's what I thought. I just was confused by you...

ERIN LORAH: Okay.

PARTICIPANT: I'm impressed by the folks that can draw down on a Friday morning because the money is going to leave their account that afternoon or something like that. That's impressive to me. We can't play in that game, we just do it all at the end of the month after it's all left our account, so...

ERIN LORAH: Yeah. It just depends on your organization because some grantees are just a lot smaller. I know like one and a half people, that's a relatively small organization from a financial perspective.

PARTICIPANT: Yes. Yeah.

ERIN LORAH: I just worked a couple weeks ago with one of our tribal coalitions and she's like, "I need to start drawing down weekly," because they don't have that money to pay it upfront.

PARTICIPANT: Sure. Yeah.

ERIN LORAH: So--yeah.

PARTICIPANT: Okay.

ERIN LORAH: The way you're doing it is the way that we ask.

PARTICIPANT: Okay. Great. Thank you very much.

ERIN LORAH: So--you're welcome.

SUHEYLA LASKY: Yeah. Every organization is going to have a different cash flow situation, so I think that's what it comes down to.

ERIN LORAH: And, Suheyly, I have one question, and I had it up but then I started writing the answers to questions and--okay. I have one. Ready? "Why do sprinters eat before a race?"

SUHEYLA LASKY: The carb overload? I don't know. [INDISTINCT]

ERIN LORAH: Nothing. They fast.

SUHEYLA LASKY: That's cute.

ERIN LORAH: And so, I will respond to all of the questions that we had done live in the chat so that you guys can have the answers too. So, take it away, Suheylya.

SUHEYLA LASKY: Thank you, Erin. Okay. Where were we? Ooh, we're getting into the good stuff, guys. This is subrecipients and contractor determinations. Everybody, I know you've been waiting for this part this whole presentation.

So basically, any time you pay another organization, another entity, you're either paying them as a contractor or as a subrecipient, okay? And I think that this program, specifically, doesn't have a serious amount of subawards. However, I do know that a lot of our grantees that are on the call right now do have awards for other programs. So, this is still incredibly pertinent information to be familiar with. Listening ears on. Again, basically when you are paying another entity, you have to decide are you paying them as a subrecipient or as a contractor?

So, when you issue a subaward to a subrecipient, you're doing it so that they can carry out your program activities. So, like a part of your program that they're helping you in a collaborative effort to carry out part of that project. On the other hand, when you work with a contractor, you are issuing them a contract for the procurement of goods and services, okay? And that would also include consultants.

So, it is vital that the determination of whether or not that entity in that capacity, for the services that they're providing to you, casts them as either a subrecipient or a contractor. And that decision needs to be made prior to issuing them an agreement tool. And it is important because there are two very different sets of regulations that you need to follow depending on if they're a subrecipient or if they're a contractor, okay?

So, a contractor, you issue them a contract. You follow your procurement procedures. It might require you to go through a competitive bidding process. You might have to get certain quotes, right? That's a contractor.

A subrecipient, on the other hand, they're not going to go through procurement at all. They are going to go through a completely different set of regulations that we're going to talk about in a minute. But just emphasizing here that when you pay this other entity, you have to know if they're cast as either a subrecipient or a contractor.

So, what is a subrecipient? That is that non-federal entity, when they receive a subaward from you, to carry out part of your program. And a contractor, on the other hand, it is when that entity receives a contract, which is a legal instrument, for which you are purchasing property, goods, services that you need to carry out the project or program under the award. We'll talk about a few different types of examples. But, basically, you need to make a determination whether or not--like I said, before you issue them any sort of agreement tool, you need to make a determination on whether or not

that entity in that capacity for those specific services, whether or not they are a subrecipient or a contractor.

And the Uniform Guidance has a very specific set of different characteristics of what makes up a subrecipient and what makes up a contractor. And you need to determine, based off of those characteristics, what they most closely align with. So whether or not it's a subrecipient or a contractor. We recommend that our grantees develop a policy and maybe some kind of checklist form that you fill out that supports the decision that you made, that determination that they are one or the other. Why is it important that this determination is made? If you are determining that they are a contractor, like I said, you have to follow your procurement procedures. If you don't follow your procurement procedures when you are issuing a contract, then that is an audit finding, right? Your auditor will see that you did not follow your procurement procedures and you decided to issue them a contract, okay? It's important that you know ahead of time so that you can follow the right set of rules and regulations. If they are a subrecipient, then you need to have that determination put into place already because you are issuing them a subaward.

There are specific components and elements that need to be contained within that subaward document, including some conditions that you need to pass through to that subrecipient that are on your own award. And if they are a contractor, then you want to make sure that you are properly negotiating those costs, okay? It's not going to be the case where you're negotiating costs with a subrecipient because subrecipients, just like you, like we're not negotiating the--your staff salary that's on the budget. You're telling us what their salary is, what percentage of time they're going to spend on the grant, what your fringe benefit rates are. And we're just going to reimburse you for the activities that you're performing under this grant. You're not making a profit off of this. You're just getting reimbursed for your actual costs that you're incurring.

The same thing goes with the subrecipient. You're not negotiating their staff salary. You're--they're just saying, "Okay, well, we'd love to partner with you on this project." You know, let's go ahead and get our advocate on this. They can do the work that part of this program with you. And this is their salary and they can do 50% of their time to work on your specific activities. So, you know, you're not negotiating things when it comes to a subaward.

However, with a contractor, you are. And that's how you know what fair market value is. You're looking at other quotes. You're seeing what the rate looks like in the marketplace. You are negotiating the costs with them. So, they are very different approaches for each the subrecipient and the contractor.

So, we have a checklist here, and the first few are more closely aligned with a subrecipient. So, your Memorandum of Understanding partners, they are generally going to be a subrecipient. That's just the nature of what that partnership looks like that you've identified somebody in the community. They're helping you carry out a part of

this project. So, your Memorandum of Understanding partners are generally going to be subrecipients.

Your federal program requirements and terms and conditions, you are also passing those through, the applicable ones, to your subrecipients. Funds received by the subrecipient, they do count towards meeting their audit threshold of \$750,000 or more in federal funds expended during a fiscal year. And if they are a subrecipient, then you are required to report on them under the Federal Funding Accountability and Transparency Act, and that's if you issue a subaward greater than \$30,000.

And, last, for a subrecipient, you are reimbursing them for actual costs incurred, just like we are with--you know, our relationship with our office and your organization, that we're reimbursing you for your expenses. You're not making a profit. It's the same with the subrecipients. You're reimbursing them for their expenses so that they can participate on this project and also give their services, you know, to carry out some of the goals and objectives with you.

Now, on the other hand, we'll talk a little bit about contractors. Procurement standards, including competition requirements and sole source approval requirements, they do apply to contractors, whatever your procurement standards lay out. Contract provisions also apply to contractors in that reference citation. And contractors can earn a profit and they, a lot of times, charge with a fee-for-service method of charging for their services, okay? So instead of listing out, you know, Mary's salary for the year times 50% of her time, plus her fringe benefits, plus her travel, instead of breaking it all down, it'll sometimes be like an hourly rate. That is inclusive of all of those other things, including profit, because they're allowed to earn profit. I'm going to take a quick pause to see if any questions...

ERIN LORAH: No questions, but I have a joke, if you want to take one. What do you call--and if anyone else wants to participate, please sit in the chat and maybe, Suheyla, we can just pretend to not know the answer. Well, I know the answer because it's in front of me, but what do you call an illegally parked frog?

SUHEYLA LASKY: I'm terrible at these. Let's see if anybody else--okay. Chris doesn't know what it is. Let's see if anybody else knows. An illegally parked frog?

ERIN LORAH: Yeah. I'm actually...

SUHEYLA LASKY: Toad truck?

ERIN LORAH: Toad.

SUHEYLA LASKY: Victoria...

ERIN LORAH: The answer is toad. So, thank you.

SUHEYLA LASKY: That's great.

ERIN LORAH: And then we do have one question, Suheylya, and I don't know if we want to go back to the slide, but--I don't remember where, but can you please circle back to the point about FFATA reporting? "Was that to reference to awards of over \$30,000?"

Yes. And this is the slide that DFMD had put together. I believe Suheylya did. And--to list out the specific characteristics that were outlined in the Uniform Guidance. And FFATA stands for Federal Funds Accountability Transparency Act. And that is when you, as direct recipients--I don't know, Suheylya, if you're typing it out, but if you award a--Federal Funding Accountability and Transparency Act, if you award a sub--subaward of \$30,000 or more, you are required to log in to FSRS, which is Federal Spending...

SUHEYLA LASKY: Reporting System.

ERIN LORAH: Yeah. And go through a whole bunch of reporting requirements of that subrecipient. So, if they are a subrecipient, you are then required to report them in FSRS.gov to come into compliance with the Federal Funding Accountability and Transparency Act.

And then the next question is, again, on the Federal Funding Accountability and Transparency Act. "How do we handle if a contract is paid with more than one fund source?" I will actually need to get back to you on that question for contract pieces of it, because I believe it is based on the source of funding. Once you give them a subaward or a contract up to that amount--so let me research it. I will let you know and get back to you.

And then the next question is timeframe, during the grant period, at one point in the grant of a multi-year grant or each year. So, they actually did updates to the definition of when the reporting is done. And once you reach the \$30,000 for that award, and I can get the specific language from the website so that it's the guide and everything, you are then required to submit an FSRS.gov the month after it was awarded. So, you essentially have 30 days to report it. There are a lot of questions about FFATA, Suheylya, so I'm actually going to go to the website, pull that stuff out, so we can give the FAQs that is specific to FSRS and a requirement of the award condition. So, I will write a whole bunch of fizzy-kippity of putting in some more FFATA information for everyone.

SUHEYLA LASKY: Thank you, Erin. Okay. So, we've talked about the importance of making the determination of whether that entity services in that context aligns them as a subrecipient or a contractor, okay? So, first, you make the determination which one are they. Next, you need to follow the right rules and regulations associated with each. So, the first one we're going to talk about is a contractor, which needs to follow your procurement policies and procedures.

Procurement is the process that your organization uses to obtain goods and services from an outside vendor. You should have a documented procurement policy that

complies with the Uniform Guidance, Section 200.318 through 200.327. You need to verify in SAM.gov that that vendor or consultant is not expend--oh, excuse me, suspended or debarred, because you cannot issue federal funds to them if that's the case. You want to make sure that your policy talks about potential conflicts of interest. Does anybody need to recuse themselves for any reason? Your procurement procedure should be consistent across the board. That's something that we talked about in the very first slides under the standards of costs, that things should be treated consistent regardless of the source of funding.

You should have one procurement process for all funding types, not a different one for each funding type, federal versus non-federal. You want to make sure that it allows for free and open competition. If you are purchasing a big-ticket item, then you may be asked to provide a lease versus purchase analysis. And if that's the case, we'll let you know and we'll give you instructions on it. You want to keep on file the records detailing each procurement. So, let's say, for example, that your procurement procedures require you to get three quotes for a specific type of threshold for expenses, okay? So that's what your procurement procedures say that you need those three quotes before you--before you decide on somebody as that contractor. If that's the case, you need to keep on file those three quotes that you got, because if you get audited, that auditor is going to say, "Did you get three quotes for this?" And you say, "Oh, yes, I did." They say, "Okay. Can we see it?" And you have to be able to show them that, right? So please hold on to anything that is surrounding your procurement details that is consistent with you following your policies and procedures, because if they look at it, they will ask for it.

Your prior approval is required if you have a sole source contract that exceeds \$250,000, and that's basically when you have like a non-competitive contract that you don't bid out. That's over that threshold. Your contract should outline all payment terms and you want to negotiate all of those payment terms. You want to identify everything, negotiate that ahead of time. You don't want to leave any room for ambiguity with your contractor. I had somebody ask a question one time that a trainer came in after the fact, after the training and wanted reimbursement for their travel costs prior to the event and getting there, doing all the things, but they never negotiated it in the contract. I mean, those are all things that you want to take into consideration when you're working on negotiating that contract. Those are all things that should be in there. Let's say in that situation, maybe you would have gone with somebody else that was equally as good, maybe their travel expenses were less.

So those are the things that you need to think of ahead of time. And also, your procurement procedures should be outlined so that they avoid obtaining unnecessary or duplicative items. All right. So, we did add this slide here because OVW—our office, just like our grantees, we get audited as well. And the auditors came back and said, "Everybody has this rate in their budgets for \$650 a day for consultants or \$81.25 per hour for their consultants, what's going on?" And we got a ton of audit findings. So, we need to make sure that our grantees are aware that \$600--so you do have an award condition, right? And it does say that you are required to obtain prior approval for any consultant rate that is in excess of \$650 per day or if it's based off of hours only, then

\$81.25 per hour. So that is not a DOJ general federal rate for consultants. There is no standard federal rate for consultants.

Consultant rates should be reasonable compensation for the consultants that is based on that individual's experience and education and the current market conditions for that area or for where they are. It should be based on an individual case-by-case basis for each different consultant. If the rate exceeds the threshold, then you come in for prior approval. But it is not a general standard consultant rate. So, we just need to make sure that we emphasize that. We did add a clarification in here, that for translators and interpreters and contracts for accommodations, that the consultant rate threshold does not apply for these types of costs. You still need to follow your procurement procedures, which if it requires you to get quotes, then you have to get quotes. If that's what your procurement procedures say, you still have to follow it. You don't have to go with the cheapest person, unless that's what your procurement says. You're required to get quotes, how do you know that anybody's rates are even reasonable, unless you know what the market looks like by getting those quotes? You're going to go with a person that provides the best service for your needs. And we know that, especially in our fields, where we have very specific needs for translators and interpreters to have a specific set of vocabulary specific to our field. So, again, you're going to go with the person that best fits your needs, but you still need to follow your procurement procedures. And, again, last clarification, the consultant threshold does not apply to these types of services.

So, we're going to shift from contracts and procurements. We're going to go to subawards and managing and monitoring your subrecipients. If you recognize this word, pass-through entity, from the Uniform Guidance, that just means that you are an organization who receives direct fundings from your federal agency and you take--so here's OVW and here is you. And we give you the money and then you take a portion of that money and then give it to a subrecipient. So, when you do that, you're passing through some of the money to that subrecipient. You're passing through the federal requirements. You're passing through those award conditions. You're passing through everything. So, you are a pass-through entity. You need to make sure that you are clearly identifying that agreement as a subaward. And there are specific elements that need to be contained within that subaward document that's outlined in the Uniform Guidance. We have the reference right here. It's under 2 CFR part 200.332(a).

One of the other things that is required of you as a pass-through entity, is to assess the subrecipient's potential risk for non-compliance with federal statutes, regulations, award requirements. So, it's also another opportunity for you to determine what type of subrecipient monitoring you put on to that subrecipient as well. So, if you think back to when you submitted your application for funding, we asked a set of 11 questions about your financial systems, about your conflicts of interest, policy, about your drawdowns, your cash management. We asked a whole bunch of questions. And it wasn't just to waste your time, I promise. It is part of our responsibility as the federal funder to make sure that we are assessing our applicants' potential risk for administering these federal funds. So, we ask you those questions as part of that process. And your responsibility as a pass-through entity is to do the same with your subrecipients, because you are

responsible as the pass-through entity to ensure that the subrecipient is expending those funds appropriately.

What other kinds of things can you take into consideration when assessing the risk? You can look at their prior history with similar subawards. You can ask them about it. You can look at their previous audits, if they've had them. Whether or not the subrecipient has had a lot of turnover recently with high level staff and/or with leadership or even with their accounting systems. Anything. You're just looking to get a good feeling about things, really. The extent and results of federal agency monitoring. When you look at those things, you can make determinations on, you know, if you're going to impose any additional award conditions or extra monitoring, anything like that.

Other things you have to do is check SAM.gov for the subrecipients prior to issuing the subawards because, again, you cannot issue funds to an entity that has been suspended or debarred. If you need to add special conditions at this time, go ahead and do it. And you would base that off of your risk assessment, like we talked in the last slide. You want to verify that if that subrecipient is required to submit their audit, that they are doing so. Consider if the results of their audits or if it requires you to make any adjustments to your records based off of that.

Again, you're making sure that they have the capacity and the ability to expend these funds appropriately. You're going to monitor their activities, their financial and performance reports, audit compliance, et cetera. And, if necessary, you can take enforcement action for their non-compliance, just like we can.

Subrecipient monitoring. It is a tool that you have that you are required to perform as a pass-through entity. You're going to monitor them by looking at their financial and performance reports, address any deficiencies that you identified during their audits or their monitoring or anything else, and you can issue management decisions for audit findings. So, it's just more tools that you have in place to ensure that during the life of the grant then that that subrecipient is doing what they need to be doing. So, you have the tools, you have the power to do all of these things.

All right. So more on subrecipient monitoring. Depending on the results of your initial risk assessment or any subrecipient monitoring, you can provide to them additional technical assistance and training. So that's to say that you don't have to not fund them if you had some concerns, but you might give them additional tools, like training or technical assistance, if there was something that you think that maybe they lacked, that would be helpful for them. So, it doesn't mean you can't fund them, but you might feel like they would benefit from additional trainings. So that's an option. You can increase the level of onsite monitoring. You can increase what you request from them for reimbursements. You know, there's lots of different things. You can arrange agreed upon procedures engagement. So, you have a lot of different types of tools available. I am going to take a pause because I feel like I saw a thousand chats coming through.

ERIN LORAH: Yes. A majority of the questions were done about the Federal Funds Accountability and Transparency Act. And I put a lot of information in there, specifically from their website. Let me go through and go to the questions. And some of the questions were very specific to, I believe, instances. And just know that this is not our website. This is not something that we determine. This is the Office of Management and Budget and, you know, transparency of where federal funds are. And it's just for federal assistance. It's not for contracts. So just for clarity there.

So, you know, "Who submits the Federal Funds Transparency Act?" That is going to be the grantee. If you meet the criteria of having to report to the website, then you are responsible of doing it.

The next question. And, you know, it just kind of goes into--I provided a link for definitions of what you have to do for reporting the subaward and executive compensation. So, if you want to go into the chat, you can see a bunch of the links. And one of the questions is that--you know, someone reached out to the help desk and they were not very clear on the dollar threshold of what needs to be submitted. And I think maybe because of the help desk you may have called is more of like a support of submitting that report.

So, I dug a little bit deeper into the actual guidance for the federal regulations. And as a prime recipient, you are required to report the obligation of the \$30,000 and each \$30,000. And that is my interpretation of what the guidelines say within the regulation. So, if there are specific questions that you guys may have for your other discretionary awards, we can actually speak to it like one-on-one. I think these are a lot of questions that don't necessarily--I would have more questions for, so that we're making sure that we're giving you specific answers. But at the end of the day, we can only read and provide guidance. The actual submission of that report in this system is something that is done with that help desk. So, we can help you with that part of it.

The next question is, "Do translators include hiring someone to translate a document website or educational materials?" And the answer is yes. That is something that we have worked hard within our office is that we don't hold those translators to the \$81.25 an hour. A lot of translators, particularly the victim services part of our office is they need to know specific crimes and the language to be able to interpret correctly, so they do not comply with the \$81.25 an hour.

The next question, "So what happens if you miss the one-month deadline?" Well, it would be a finding and you would have to make sure you beef up your policies and procedures for submitting that. Within your federal award conditions, there is an award condition on there that states that if you meet that thresholds of awarding--or sub-awarding out, you are confirming you will submit the required reports to FFATA. So, if you're ever monitored, they'd go and look to make sure that, one, do you have any subrecipients and, two, if you do, did they obligate--is the award more than \$30,000? Did you report within that timeframe that you're required to? And if not, it would just be a recommendation.

The next question is, "Can you clarify whether contracts over \$30,000 are not subject to this reporting requirements, only subawards? I think that is what I heard you say but want to make sure." When I looked on 2 CFR part 170, the Federal Financial Assistance subject to the Transparency Act is applicable to grants, cooperative agreements, loans, loan-guaranteed subsidies, insurance, food commodities, direct appropriations. I did not see any contracts on there, so--and I can copy the link address and put that in the chat.

And then the next question is, "Can you clarify whether folks should still do it in ASAP after they realized?" Yes. So, if recipients figure out that they should have reported and it's FSRS.gov and they didn't, immediately log into the system, create an account, and report it. We understand that you may not have met that deadline, but just go in, document it, and report what you need to make sure that you come into compliance with the award condition. So, thank you for that question. I think that is all of the questions. And they should just do it as soon as--yes. What we always try to tell all of our grantees is that we are here to help and we're not here to like, "Oh, my goodness. You did it this way, you're in trouble." No, we are not like that at all. We'll help you, guide you what you need to do as much--as well as, you know, do it as soon as possible.

Did you submit--did you forget to submit your Federal Financial Report? Go in there and submit it. Your funds are on hold until it's been submitted anyways. So just remember, unless you have the egregious things Suheyla had mentioned earlier in the presentation, nothing is not fixable and everything can be discussed and we can work through it. So--and to make sure that you are managing your award, from a financial perspective, in the correct way, in line with the Uniform Guidance. So, I think that was it, Suheyla. We had a lot of questions. And if I did perhaps forget to answer specifically some of them, let me know, and reach out to us because we can maybe go into a little bit more specifics. The links to the regulations are there to give you a little bit more information. And I do apologize that the help desk was--not our help desk. Clarification. Another federal agency's help desk was not as helpful with submitting in those reports. And I would hope that if GFMD have the answer, they would be able to provide that for you.

One more question. "We are currently reporting on the dollar amount we make to the agreement out to be a total dollar amount that we can or may pay up to over the course of one or three years if the whole thing is over \$30,000. It was the actual amounts paid per month if those were over the threshold at \$30,000. Our auditors tell me otherwise that it shouldn't be actual amounts paid each month and that the obligated value is what's in the written contract with them. We will continue to report on the agreement amount unless you tell me otherwise." So, it's not the amount that is paid. It is the amount that's obligated. So that is the award document. So, if we--as a federal agency, we commit and obligate our funds to you because we're obligating and committing we're going to pay you \$30,000. If you give an award and the first amount is only \$10,000 obligated, you wouldn't report it yet. Once it reaches the cumulative amount of \$30,000, as that's the obligated amount, because you are agreeing to give that amount to them, and that is when it needs to be reported to the website. So, I think I'm understanding

and I believe I'm in agreement with your auditors that it's not the amount that you have paid them, it's the amount of that subaward once it reaches \$30,000. Okay, Suheyla, take it away.

SUHEYLA LASKY: Okay. Next, we're going to talk about grant modifications, but we're actually only referring to the ones that come across our desk in our finance office. So those two that come through our office are the budget modification GAMs and also when you're changing the project period. They used to be called Grant Award Notifications and now they are called Grant Award Modifications now but--you know what? I don't even remember what they used to be called, but we call them GANs. Erin, do you remember?

ERIN LORAH: Grant Adjustment Notices.

SUHEYLA LASKY: Thank you. It feels like a million years ago that we were in GMS. Okay. So, moving on. The budget modifications, as you may notice, if you've been here long enough, the list of changes that require grantees to come in for modifications continues to dwindle down, which is a good thing for you and you have our wonderful leadership with Erin to thank for that.

So, we are working harder to put on less requirements for our grantees. This being one of them. So, now, prior approval via the budget modification is only needed when, one, if you move funds into a category that were--that was not previously approved. So, let's say, for example, you have \$0 under the supplies category and you moved \$500,000 into that category, you need to come in for a budget modification. The second thing is the one that everybody is familiar with is when there is a cumulative change greater than 10% of the award amount. So, if you have an award for \$300,000 and 10% of that is \$30,000, then if you move more than \$30,000 amongst the categories, then you come in for a GAM.

I want to--clarification. That's amongst the category. So, from personnel to friend or from consult--or contracts and procurements to other, right? I'm not talking about within the category but that's from category to category. When it adds up to \$30,000, then you come in for a budget modification. There's always a lot of questions about that, so I will let them be addressed in the chat box, if there's any. So please feel free to ask away.

Now, with your budget modification, make sure you're attaching the revised budget, and the level of detail that's in that revised budget should be similar to what you include in your original approved budget and all costs should be broken down and supported with a narrative to justify cost. Attach any indirect cost rate agreement if you have one and that should cover the whole period of performance of the award. And just as a note, your budget is reviewed and approved by a program specialist first and then the financial analyst. So, there are multiple review levels and we each look at them for different things.

All right. Closeout and records retention. So, when you are finishing up your award, I'm sure you're going to remember this part of the presentation, where we talked about closing out your award. So just come back to this slide and--you know, for some guidance and everything will come back to you. So, with that closeout, you need to work on submitting your final financial report, final progress report, satisfy all your award conditions, complete a Financial Reconciliation, and then submit your closeout in JustGrants within 120 days after the award ends. Make sure you do this on time because non-compliance with that closeout requirement, unless there is a technical glitch that is documented, then that could negatively impact future funding decisions. The previous closeout period was 90 days, but it has been extended to 120. So that's a good thing.

What is the Financial Reconciliation that I mentioned on this last slide? What does that mean? And that's basically where the system and you are comparing what you drew down for reimbursements from OVW against what you actually expended in funds. So, who owes who what money? Do we owe you money? If so, draw it down in the payment system. If you owe OVW money, contact us and we'll give you instructions on how to return the funds, okay? But you want to do this within the 120-day window, because if you don't draw down on your funds that are owed to you within that window--it's called the liquidation period. If you don't do it yourself within the 120 days, I'm not saying it's lost but it's going to take a long time to get that money. So, please, draw down your funds within that 120-day period. Okay.

Your records, you need to hold on to them after your award closes for three years after you submit your final financial report and--or if you have an open audit, then after your audit, everything--after that's closed, everything was addressed. But it's three years. And I still get questions from people who I know who are on presentations every single year. You know, "I don't know the retention period is. How long is it?" Three years. And that's after your final financial report is submitted. And what do you need to hold on to? All of your financial records, any supporting documentation, and, really, anything else that pertinent to your award, okay? So, make sure you hold on to it for this period because it is still auditable. And you can either hold on to that hard or electronic copy, doesn't make a difference for us. Just make sure it's consistent with your policies and procedures and that any confidential records are maintained in a secure fashion.

Resources. Here we have--the first link is the Electronic Code of Federal Regulations. So that's where you can see that big Uniform Guidance. I do recommend that you visit this link. Erin is putting it in the chat right now. You visit the link and you save it as a bookmark or whatever. I think that it's important for every grantee to be familiar with. This is really the crux of what we base our policy off of and, you know, if you have questions about indirect costs, if you have questions about allowability of costs, it's definitely the first place that we look. So please be familiar with that.

Then we have the OVW--the Solicitation Companion Guide. Then a link to the DOJ Financial Grants Management Guide. Another one that's great to bookmark. Then we have a webinar on creating a budget and it's a training for OVW applicants on how to

put a budget together. So, I've been talking for about--what's it been like? Two plus hours right now. If you haven't had enough of my voice over the last two hours, then you get to listen to another training if you want on creating a budget. So, it's a good resource on what does OVW look at when we look at a budget, what are the considerations we make, where should you be putting those funds, et cetera. It's in the training. And then the last one is the resources for JustGrants training, okay? That's a good one. If you're stuck in JustGrants and need to figure something out, it's a good place to go.

All right. Last, we have the online training. And this is the financial grants management course that used to be an in-person course, like 10 plus years ago, and we took the in-person training with--oh, it's a component-wide training between our office, the COPS office, and the Office of Justice Programs. And we took the in-person training and made it online. So, it's accessible at any time. No registration limitation. It's free. You just need your UEI and your award number to register. You have one year to complete the course and retain all of your progress. And it takes about 14 to 16 total hours to complete. There are quizzes throughout and a final exam at the end. And if you pass it, then you get a certification and you get to hang it up on your wall, there's a website for that. But, yeah, I recommend the training. I think it's a good one. And, Erin, do we have any final questions?

ERIN LORAH: We do. We just have a couple.

The first question is in reference to the Grant Award Modifications with the budget modification, and they had asked if that was only for grant awards up \$250,000 or more? And I actually went into the financial guide so we can get the specific information, and the GAM could be initiated for a budget modification if the request is to modify the budget to reallocate the funds among the budget categories. The 10% rule does not apply to an award of less than \$250,000. However, if you are moving it in to categories that weren't previously approved, then, yes, you are required to submit the budget modification.

The next question, and I didn't give them a very good answer because I cannot guarantee any of the answers for the system, "Can Grant Award Modifications and deliverables be submitted during the closeout periods?" You can submit your final reports during that closeout period. However, I do not know that you have the ability to submit any award--oh, so this might be--you're supposed to but it may not work.

SUHEYLA LASKY: So, I saw chatter recently amongst developers for JustGrants. GAMs cannot be initiated by external users in the closeout period. And that's...

ERIN LORAH: [INDISTINCT] in the legacy system. And so--but we have heard requests of being able to do it while it's in closeout. And then we just got another question, "I still find JustGrants pretty confusing. If there was more we needed to do for our closeout, would it show in my worklist?" If you need to submit your closeout and you are the assigned grant award administrator, it would be in your worklist for you to do it, but you would have to be the assigned grant award administrator to complete that. So, I

recommend you to log in and see if it's in the worklist. And if you have any questions, you can just reach out to the help desk and we can go in there and research it for you. That is all of the questions, Suheyla.

SUHEYLA LASKY: Thanks, everybody, for hanging around and listening so intently and asking great questions. It's really appreciated. And it's how we know that you're listening. I'm just kidding. No, we appreciate your time. We really do. And you know where to find us, you know our email addresses, you know our help desks, so let us know if you have any questions afterwards. Thank you.

ERIN LORAH: Thank you, everyone.