

**VOCA GUIDEBOOK**  
**Victim Assistance Division (VAD)**  
**Effective: 3/11/2019**

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## **Introduction**

This guide was created to assist you with the implementation of projects funded by Victims of Crime Act (VOCA) dollars. The information contained within will be a tool to utilize throughout the project period in conjunction with the Special Conditions and the grant application instructions. Please take the time to thoroughly read the guide and assure others within the program who have oversight of the grant also read it and have it available. Updates could occur during the project period, at which time notification will be sent and the most current version will be available on the Nebraska Crime Commission website.

The increase of VOCA funds has been accompanied by an increase of federal oversight. Below is some general information to think about in the management of your VOCA grant and decreasing potential grant audit issues.

When an audit occurs, there are several things that are looked at. It is important to remember that an audit conducted at the federal level (OIG) is drastically different than the Single Audit (formerly A-133 Audit) that an accountant does for your agency each year. During a single audit they are not looking for compliance with federal or state grant compliance, rather the accounting methods used for the agency. From the federal level, the auditor wants to see that items approved and reimbursed fit the following criteria:

1. Is it **ALLOWABLE**? Does the funding source allow for that line item under the guidelines of the grant. State Administrators can be stricter with what is allowable than the federal guidelines allow.
2. Is it **ALLOCABLE**? Assuring that the line item is equitably charged to funding sources based on the benefit of the cost to the funded program.
3. Is it **NECESSARY**? For VOCA this would be determining if that line item is necessary in order to provide direct services to victims.
4. Is it **REASONABLE**? Being good stewards of the federal dollars is assuring that grant dollars are being spent on fiscally responsible items.
5. Is there **SUPPORTING DOCUMENTATION**? The above four items could be true, however if there is not adequate supporting documentation the grant cannot reimburse for that line item.

Auditors look through all supporting documentation to assure that they can tie the line item that was paid for back to what was approved within the grant. This is why it is very important when sending in reimbursement to assure that items being requested for reimbursement are already within the approved budget. It is also very helpful for the VOCA Financial Evaluators, auditors and the VPCA Grant Administrator to have recipients explain circumstances in the "Notes" section of the Transaction. The more information provided the better to reduce questions during reimbursement process, monitoring or several years down the road during an audit. An example of this would be, if an individual is filling in for a VOCA grant funded position that is vacant, indicate that in the notes for the applicable time period(s). Communication is the key to successful grant management. Maintaining frequent contact with the VA Division Staff will assist in timely resolution of issues and allow for technical assistance to be provided effectively.

**I. Match Requirements (28 CFR 94.118):**

- A. VOCA recipients are required to provide a 20% match share of the overall requested budget, unless a Waiver of Match has been approved.
- B. Match allocated for VOCA cannot be used or reported as match for other federal awards.
- C. All matching funds required by your VOCA grant must be obligated by the end of the project period.
  - 1. At least 50% of the match requirement for the grant budget year should be reported on or before the halfway point of the grant budget year.
  - 2. If 50% of the match requirement hasn't been met, please contact your Grant Specialist as soon as possible.

**D. Full or Partial Waiver of Match:**

- 1. Only the federal Office of Victim of Crime may waive the match requirement for subgrantees that can provide documentation of extraordinary need as outlined in 28 CFR 94.118(b)(3) of the VOCA Victim Assistance Final Program Guidelines.
- 2. Matching requirements are automatically waived for subrecipients that are federally recognized American Indian or Alaska Native tribes, or projects that operate on tribal lands.
- 3. Projects funded in previous project periods are expected to provide the level of match as provided in the previous project period.

**4. Waiver of Match Request:**

- a. Applicant must submit a Waiver of Match Request letter with the grant application.
- b. Request Letter must include the following information:
  - i. Be on the Applicant's Agency Letterhead addressed to the Crime Commission.
  - ii. Explain why the waiver is necessary/clarify the need for increased funding.
  - iii. Outline the issues related to the project's lack of resources (i.e. volunteers, other funding, in-kind donations).
  - iv. Clearly indicate/describe the hardship and/or type of circumstances that will hinder the applicant's ability to provide the required level of match.
- c. The Waiver of Match Request letter will be forwarded by the Crime Commission for review and approval determination by the federal Office of Victims of Crime.
- d. Please be aware that approval from OVC may not be received prior to the execution of a grant award.
- e. The Special Condition of the subrecipient's grant award will state the condition that if the match waiver is denied, the subrecipient will be required to generate the additional match that was denied or reduce the VOCA award to the proportionate amount of match provided.

- E. **VOCA match funds** may be in the form of cash contributions (cash match), in-kind contributions (in-kind match) or a combination of both methods.
- F. **Cash Match Funds** must be derived from non-federal sources (i.e. funds from states and local units of government that have a binding commitment of matching funds for programs or projects), except as provided in the Department of Justice Financial Guide, effective edition (Part III, Chapter 3, Match Requirements).
- G. **Utilizing Volunteer as In-kind Match**
1. Value of volunteer service is up to \$22.25 per hour for in-kind match purposes of professional equivalent positions (i.e. Advocates, CASA volunteers, etc.) or other direct service professionals such as attorneys, therapists.
  2. Value of volunteer service is up to \$15.00 per hour for in-kind match purposes of administrative support positions (i.e. filing, mail, file creation, etc.)
  3. Volunteer Service Documentation must include:
    - Name
    - Date
    - Description of Services Provided
    - Total Hours
    - **Volunteer Signature** – If it is difficult to secure the signature of volunteers due to accessibility to the office, consider:
      - Utilizing Electronic Signatures in a PDF fillable form
      - Having the volunteer email a jpeg (picture) of their signed timesheet that the volunteer's supervisor can print and sign for approval.
    - Supervisor Signature
    - Location of Service
- H. **Utilizing Rent as In-kind Match**
1. Must be documented with a lease that verifies the value of the space donated.
  2. The cost of the space may not exceed the rental cost of comparable space and facilities in a privately owned building in the same locality.
  3. A letter to the grant file from the rent provider will satisfy this requirement.
- I. Subrecipients are **required to maintain records on all match contributions** that clearly outline:
1. Contributing source
  2. Date of Contribution.
  3. Amount of Contribution,
  4. Explanation of the basis for determining the value of items used for match for your grant. (i.e. personnel services, materials, equipment and office space)

## **II. PROJECT CHANGE REQUESTS (FORMERLY SUBGRANT ADJUSTMENTS)**

- A. A **Project Change Request** is a request to make changes to the a project's budget, program, key personnel, or project period that is submitted in GrantVantage by way of:
1. Budget Revision Request
  2. Request Budget Change

### 3. Program Approval Request

- B. **Budget Revision Requests, Request Budget Change, and Program Approval Requests** must be submitted through GrantVantage utilizing the communications feature.
- C. Program Change Requests are not in effect until an emailed confirmation response is received from VAD staff.
1. **Budget Revision Request**
    - a. To be used when:
      - i. There is a change in the start or end date of the funded project
      - ii. A transfer of dollars and any matching dollars above 5% of the total amount awarded
    - b. Must be requested and approved **prior** to a change made within the project.
    - c. Costs that do not have prior approval will not be reimbursed, with the exception of the 5% rule explained below (See Request Budget Change).
    - d. **All** Budget Revision Requests must have a narrative to explain the requested adjustment, this includes changes in project personnel.
    - e. Budget Revision Request submitted improperly will be returned.
    - f. Maximum of two budget revision requests initiated by the subrecipient will be allowed for every 12-month performance period of the grant.
      - **EXAMPLE:** A 2-year project period will allow for 2 budget revisions in the first 12-month period and 2 in the last 12-month period.
    - g. End of the project period adjustments needed to balance out the budget **do not** count towards the Budget Revision Request restriction.
    - h. All budget revision requests must be submitted by **the last quarter of the budget year (each 12-month period)**.
    - i. Requests submitted after this deadline will not be considered, *unless* they are for emergency direct-client assistance needs.
    - j. Budget Revision Requests go into effect on the date it is approved and are not retroactive.
  2. **Request Budget Change**
    - a. Utilize this budget adjustment function if your program is requesting to adjust up to 5% of your total project cost (grant funds + match) within broad cost categories (i.e. supplies, travel, operating expenses etc.) in the approved original budget.
    - b. DOJ does not allow movement of funds to a cost category that did not exist in the original approved budget.
    - c. **EXCEPTIONS** that must have prior approval and a budget revision:
      - i. Any **Personnel Increase Above 1.5%** that could include:
        - Cost of Living Increases
        - Performance Pay Increases
        - Hire Rate or Other Increases Above the Approved Wage/Salary in the Budget.
      - ii. Any **Change to the Indirect Cost** Category of an approved budget
    - d. It is the program's responsibility to ensure new costs added using this method are allowable per the federal VOCA regulations.
    - e. Please contact your Grant Specialist if you have any questions or want to

determine if a cost would be allowable.

3. **Program Approval Request**

- a. To be used when:
  - i. The focus of the funded project changes
  - ii. A new Program Point of Contact, Fiscal Point of Contact, or Authorized Official is named for the awarded project
- b. Project Personnel changes **do not** have to be done prior to the change occurring
- c. Changes in Project Personnel must be submitted within 30 days of the change occurring.
- d. Changes in the program need to be communicated with the Grant Specialist through the GrantVantage communication feature.
- e. Requests will be submitted through the GrantVantage communication for approval/review by the Grant Specialist.

**III. GRANTVANTAGE USER ACCESS**

A. **GrantVantage User Licenses**

1. **GrantVantage User License** is assigned to key project personnel to give them access to the GrantVantage Grant Management Solution for program and financial grant management.
2. The number of users assigned per agency will be determined on a case by case basis by the VA Division staff and is based off of business need.
3. Some considerations taken are size of grant, agency capacity and/or structure, and availability of licenses.
4. Authorized Official or any other position will not have a GrantVantage License if:
  - a. The position is the signing authority only OR
  - b. Have no responsibility for the day-to-day oversight of the grant as there is no business need for a license.
5. Due to the internal processes to manage licenses please allow up to 3-5 business days.

B. **New User License Requests**

1. To request a New User License, the Program Point of Contact will send to the assigned VOCA Grant Specialist and VA Division Operations Assistant a "For Approval/Review" communication via GrantVantage to request a New User License
2. If the New User is the Program Point of Contact, send an email to the subrecipient assigned Grant Specialist and VA Division Operations Assistant to request a New User License.
3. **Format of the New User License Request**
  - First and Last Name
  - Professional/Work Email
  - Mailing Address
  - Work Phone Number
  - Job Title
  - Role for Grant -- *If Applicable: Program Point of Contact, Financial Point of Contact, or Specify if Other*
  - State business need for the license



4. **New User License Request Approval and GrantVantage Login**

- a. The Grant Specialist will review the request and notify the Program Point of Contact of the decision made.
- b. If approved, the New User will receive **temporary** login information and a link to complete GrantVantage Training from [support@grantvantage.com](mailto:support@grantvantage.com).
- c. The New User will have up to **30-calendar days** to complete the training; after which, access to the training module will be deactivated and that person will no longer be eligible for a user license.
- d. Once training has been completed, the New User must save the Training Certificate and email a PDF version of the certificate to their Grant Specialist.
- e. The Grant Specialist will notify the VA Division Operations Assistant who will email to the New User:
  - i. Link to the GrantVantage Post-Award Solution.
  - ii. Login credentials of the New User
  - iii. Temporary Password to access the GrantVantage Post-Award Solution.
- f. The user must change their temporary password to a permanent password after logging in for the first time.

C. **Update User License Requests**

1. A request to modify or update a current GrantVantage user's license profile.
2. Examples of profile items to modify include, but are not limited to:
  - Email Address
  - Name
  - Job Title
  - Contact Information
  - Role within the Grant (if applicable)
3. The User or Project Point of Contact can submit the change to be made to the GrantVantage license by contacting their assigned Grant Specialist and VA Division Operations Assistant via the GrantVantage communication feature and provide the information to be updated.

D. **Delete User License Requests**

1. A request to remove a user license of a user that will part from the agency or no longer has a business need to access GrantVantage.
2. Notification *must* be sent within **24-hours** of the change occurring
3. Program Point of Contact will notify the Grant Specialist and the VA Division Operations Assistant via the GrantVantage communication feature with the following information:
  - User First and Last Name
  - Job Title
  - Role within the Grant (if applicable)
4. If the Program Point of Contact has an unplanned departure from the program, the Authorized Official or designee will notify the Grant Specialist and Operations Assistant via email with the same information as listed in Item-3 above.
5. Upon receipt of the communication

- a. VA Division staff will remove all user permission for the deleted user
- b. VA Division staff will make proper notifications for license removal
6. Once the user is deleted, that person is no longer eligible for a GrantVantage License.

**E. Password Reset Requests**

1. A request made by a current licensed user that needs their GrantVantage password reset
2. Submit an email to their Grant Specialist and the VA Division Operations Assistant with their user name and request for a password reset.
3. The user will receive an email from the OCIO Helpdesk with the new password.

- F. Grant Vantage Technical Assistance** - Users that are experiencing technical difficulties with GrantVantage will need to email [support@grantvantage.com](mailto:support@grantvantage.com) for assistance.

**IV. FINANCIAL REPORTING REQUIREMENTS**

**A. VOCA Financial Reporting**

1. All financial transactions, correspondence, and change requests are to be submitted by way of the GrantVantage platform utilizing the communication feature.
2. **Transactions and Invoices:**
  - a. Transactions
    - i. Tool for the reporting of expenditures in GrantVantage.
    - ii. Strongly recommend **entering weekly** into GrantVantage.
    - iii. Approved transactions compile to create an invoice.
  - b. Invoices for Drawdown:
    - i. GrantVantage equivalent to the formerly used Cash Report
    - ii. **Submission is required monthly.**
    - iii. Invoices are **Due on the 15<sup>th</sup> of the month** that follows when the expense/transaction was incurred.
    - iv. If the 15<sup>th</sup> of the month falls on a weekend or holiday, submit reports on the business day **prior** to that weekend or holiday.
  - c. Training Videos on Transactions, Drawdowns, and more can be found on the VOCA webpage of the Nebraska Crime Commission website <https://ncc.nebraska.gov/grants#tab-1-9>
3. **VOCA Financial Reports** should be submitted **no more than 2 months after** expenses are incurred.
  - **Example:** Expenses incurred in December 2018 should be reported no later than March 15, 2019.
4. All final reports for grants are due within 45 days after the end of the budget year.

**B. Inadequate/Deficient Financial Reporting:**

1. **IMPORTANT:** VA Division staff will “deny” any expenses that are not adequately supported and approve payment for only those that are verified.
2. Subrecipients will be provided two opportunities (per OI #10) to provide requested documentation before the cost is permanently denied.
3. If the cost in question is part of a larger cost, the whole expenditure will be

- withheld until the questioned cost is verified.
4. This may result in subrecipient being referred to the Division head for suspension of grant funds to address corrective action items.
  5. Continued deficiencies will be referred to the Executive Director of the Crime Commission for possible termination of the grant.
  6. **Reporting Example:**

*October Payroll for Advocate II has been submitted to NCC with a questioned time in one of the October payroll weeks. Due to this, all of Advocate II's payroll in the transaction allocation will be denied for the October reporting period and notice will be sent to the Fiscal Point of Contact requesting additional supporting information to be submitted to rectify the questioned cost on Advocate II's payroll. If questioned cost is not resolved after the first notice, there will be a 2<sup>nd</sup> and final notice requesting supporting information about the questioned cost. If the questioned cost is not verified after the 2<sup>nd</sup> notice, all of Advocate II's payroll will be permanently denied and the request for reimbursement will be considered paid in full when payment is made for the remaining costs that are not questioned. VA Division staff may require subrecipient to re-submit the request for reimbursement of questioned costs in the next reporting month.*

**C. De-Obligation, Suspension, & Termination of Funds**

1. VOCA funds that are not spent by the end of the project period will be de-obligated, no exceptions.
2. An indicator of good grant management is to assure that the program is able to expend the funds awarded within the project period.
3. VAD staff *may* request certain programs to extend project periods depending on the VOCA federal award's project period end date from which their program is awarded.
4. Sub-recipients who fail to comply with VOCA deadlines and requests for additional information may have disbursements temporarily suspended until reports are current and/or accurate.
5. Subrecipients that consistently fail to comply with timely financial and/or grant reporting may be subject to having their current award terminated.
6. Please refer to Nebraska Crime Commission Operating Instruction 10.011.02 (A-C); 10.011.04 (A-D) and 10.013. Operating Instruction #10 can be found on the Nebraska Crime Commission website at: <https://ncc.nebraska.gov/agency-policies-and-procedures>

**D. Refund Recovery**

1. Refund is owed by the subrecipient to the Crime Commission when funds have been paid to a subrecipient by the Crime Commission, but were for expenses not owed due to allocation, budgeting, and/or processing error.
2. When a subrecipient owes a refund to the Crime Commission:

- a. The subrecipient's VOCA Grant Specialist or Financial Evaluator will notify the subrecipient that a refund is necessary by way of a Refund Request Notice.
- b. **Refund Request Notice** is to include:
  - Reason for Requested Refund
  - State-issued Grant Number
  - Federal Grant Number
  - Dollar Amount to be Refunded
  - Date Refund is Due
  - Address to send refund:
    - Nebraska Crime Commission
    - c/o Budget and Accounting Division** ← **This MUST be included**
    - PO Box 94946
    - Lincoln, NE 68509-4946
- c. Refund Recovery is given no more than 5-business days for recovery to be received by the Crime Commission.
  - i. If need more than 5-business days - subrecipient must request an extension from the head of the VA Division outlining the reason for the request.
  - ii. The head of the VA Division or designee will determine if the extension will be granted and advise the subrecipient.

**E. Proper Financial Records**

1. VOCA federally requires that subrecipients retain all grant financial records, supporting documents, statistical records, and all other records pertinent to the award for three (3) years after the closeout of the federal award or three (3) years from NCC's VOCA Grant's last federal audit, whichever is later or longer in accordance with your agency's records retention policy.
2. Though all records must be retained, the current VA Division monitoring procedures no longer require 100% documentation to be submitted in GrantVantage unless otherwise advised based upon the program's monitoring level.
3. All VOCA financial documentation must be made available for VA Division staff if/when requested.
4. All supporting documents must show the prorated amount of the line item to VOCA and provide the calculation of that item.
5. The prorated amount must match what is provided on the general ledger and add up to the amount indicated in GrantVantage.
6. Personally Identifying Information (PII) of clients is confidential and must be redacted from all supporting documentation.

**F. Personnel & Fringe Benefits Categories**

1. **Personnel Records to be Submitted for Reimbursement:**
  - Timesheets
  - Paystubs
  - Name

- Date
  - Number of Hours Worked
  - Rate of Pay
  - Gross Pay
  - Employer-paid Fringe Benefits
2. All employees (including salaried) who are paid with VOCA grant funds or are used as Match are required to complete a timesheet that confirms actual hours worked, even when in excess of 40 hours per week (80 bi-weekly).
  3. All volunteers used for in-kind match must complete timesheets as well.
  4. **Acceptable timesheets** must include the following items:
    - Name
    - Pay period beginning and ending dates
    - Date
    - Hours worked (allocate actual hours by funding source)
    - General description of activities conducted
    - Leave (allocation to the funding source is based on actual hours worked)
    - Employee Signature and date
    - Manager/Supervisor Signature and date
  5. **Bi-Annual Certification**
    - a. All employees that are 100% devoted to VOCA must submit Bi-Annual Certifications that certify 100% of their time was spent on VOCA allowable activities.
    - b. The certification can only be completed for hours already worked.
    - c. Time periods covered are **July 1 – December 31; January 1 – June 30.**
    - d. The certification language can be added to the signed timesheet and completed by pay period.
  6. **Bonuses, Overtime, and Fringe**
    - a. Nebraska Crime Commission only reimburses for basic fringes as outlined in the approved budget.
    - b. Insurance invoices must be submitted with the first submission in GrantVantage to verify the expenses for the reporting period.
    - c. If the rates change mid project period, program must submit current invoice documenting the changed rate(s).
    - d. Payments of overtime is not allowed without prior approval.
    - e. Employee bonuses of any kind are not allowable.
    - f. If the budget does not specify leave benefits, then only the following will be allowed at a maximum:
      - i. State recognized Holidays
      - ii. sick leave
      - iii. vacation leave
      - iv. bereavement leave; and
      - v. other leave as required by federal law.

- g. The Nebraska Crime Commission will allow the submission of a program's current written personnel policies to determine if there is other reasonable leave that would be reimbursable.
- h. If any non-budgeted leave is approved by VAD Staff; a Budget Revision will be required.
- i. Leave Payouts are not allowed with VOCA funds due to the inability to accurately track the devotion to VOCA of that individual while employed by the agency.

**G. Consultants/Contracts Category**

- 1. All contracts or agreements under this category must be provided with the first submission in GrantVantage for the grant period.
- 2. It is the responsibility of the subrecipient to submit renewals or new agreements throughout the grant period when necessary.
- 3. Invoices must be retained in the subrecipient's grant records and made available to VAD staff upon request.

**H. Travel Category**

**1. Travel Policy Requirements**

- a. Programs may have travel policies that are more restrictive, however, it must be in compliance with CFR 200.474 regarding Travel Costs.
- b. If the agency has their own travel policy, a copy of the policy must be submitted with their first transaction submission in GrantVantage for the project period and anytime changes are made to their travel policy.
- c. If the agency does not have their own travel policy, the State of Nebraska Travel Policies must be followed (see sections H3-H5 below).

**2. Travel Records to Be Submitted for Reimbursement:**

- a. Mileage Logs which **must** include:
  - Employee/Volunteer Name, Signature, and Date
  - Date of Travel
  - Start/Stop Location
  - Total Miles Traveled
  - Purpose of Trip
  - Supervisor Signature and Date
- b. Itemized Airfare Invoice Showing:
  - Payment for Airfare
  - Departure Location & Date
  - Arrival Location & Date
- c. Itemized Hotel Invoice Showing:
  - Payment for Hotel
  - Dates of Stay
- d. Individual Itemized Meal Receipts Showing:
  - Date of Meal
  - Description of Item and Cost.
  - Tip that does not exceed 20% per occurrence
  - Incidentals w/ a maximum of the \$5 (to include tips).



- **EXCEPTION:** If the agency has a Per Diem policy, itemized receipts are not needed.
- e. **Certificate of Completion** or an **agenda** for trainings/conferences attended
- f. **Registration costs and other miscellaneous costs** (i.e. parking, ground transportation, etc.) must provide:
  - i. Dates Expense Incurred
  - ii. Location of the Expense Incurred, and
  - iii. Rate Charged for Expense Incurred.
- 3. **Airfare** must be the least expensive unrestricted accommodations class EXCEPT when travel would:
  - a. require circuitous routing
  - b. require travel during unreasonable hours
  - c. excessively prolong travel
  - d. result in additional costs that would offset the transportation savings
  - e. offer accommodations to meet traveler's medical needs - Documentation must be provided to justify the expense on a case-by-case basis.
- 4. **Meals:**
  - a. **Day Travel** - Meals for day travel are NOT reimbursable; even if the agency travel policy allows it.
  - b. **Overnight Travel Reimbursements:**
    - i. Reimbursements paid for food/meals will default to actual amounts spent if not paid a per-diem per the agency's policy.
    - ii. Per-Diem per the agency's policy is reimbursable if it is not above the GSA rate for Meals & Incidental Expense for the travel destination.
    - iii. Meals that are provided as part of a conference/training or lodging (i.e. breakfast included) cannot be reimbursed in addition to that cost unless the meal is not substantial (documentation must be provided to verify).

**Example A:** Lodging at a hotel that provides continental breakfast; Reimbursement of additional breakfast is not allowed.

**Example B:** Attending a conference that lunch is provided; Reimbursement of additional lunch is not allowed.
  - c. The below meals are allowable for overnight travel:
    - i. **Breakfast:** when the person traveling leaves at or before 0630, breakfast can be reimbursed
    - ii. **Lunch:** when the person traveling leaves at or before 1100, or returns from overnight travel at or after 1400, noon meal may be reimbursed
    - iii. **Supper/Dinner:** when the person traveling leaves for overnight travel at or before 1700 or returns from overnight travel at 1900, the evening meal may be reimbursed

5. **Lodging:**
  - a. Allowable expense if the person is more than 60 miles from his/her workplace.
  - b. Exceptions may be made due to weather, work requirements, or medical conditions.
  - c. If any of the above circumstances exist, the reason must be clearly stated on disbursement documentation.
  - d. Lodging must follow the "government rate" (GSA) when possible.
  - e. If there are no hotels in the area able to offer the government rate, this information must be clearly stated on the disbursement documentation.
6. **Training and Conferences:**
  - a. It is the responsibility of the agency to assure training attended with VOCA funds is relevant to providing services to victims of crime and follows the proper travel policies and rates.
  - b. VOCA cannot fund non-direct service staff to attend training
  - c. Out-of-State Training that is included in the approved budget as unspecified will require the completion of the Out-of-State Travel Authorization Form
  - d. In-state Training that is included in the approved budget as unspecified training travel expenses does not require prior approval from VAD staff if attending training sponsored by one of the following:
    - Nebraska Coalition to End Domestic Violence and Sexual Assault,
    - Nebraska Child Advocacy Center Alliance,
    - Nebraska CASA Association,
    - Nebraska Coalition for Victims of Crime,
    - Nebraska Victim Assistance Academy,
    - Nebraska Crime Victim-Training and Technical Assistance Program (once implemented by the Victim Assistance Division) or other VOCA sub-recipients.

**I. Consultants/Contracts Category**

1. All contracts or agreements under this category must be provided with the first submission in GrantVantage for the grant period.
2. It is the responsibility of the subrecipient to submit renewals or new agreements throughout the grant period when necessary.
3. Invoices must be retained in the subrecipient's grant records and made available to VAD staff upon request.

**J. Subawards Category**

1. Programs that have subawards (2<sup>nd</sup> tier subawards) to other agencies are responsible to ensure that each subaward has the following:
  - Grant Award document
  - Special conditions
  - Proper financial controls
  - Systems in place for data collection
  - Compliance with Federal Civil Rights
2. Program will be responsible for monitoring (Program and Financial) each 2<sup>nd</sup> tier



subaward to ensure grant compliance. Documentation of monitoring must be maintained as part of the grant file and provided upon request.

- K. **Supplies Category - Supplies** are any general office supply that is consumable/that gets used up or discarded and includes but are not limited to:

- pens
- pencils
- notebooks/paper
- paper clips
- staples
- facial tissue/Kleenex
- bathroom tissue

- L. **Operating Other Expenses Category**

1. **Rental Agreements**

- a. Whether your agency rents office space or receives space as in-kind donation, you are required to have a written rental agreement or statement of in-kind value provided by a Realtor's assessment.
- b. All contracts or agreements under this category must be provided with the first submission in GrantVantage for the grant period.
- c. It is the responsibility of the subrecipient to submit renewals or new agreements throughout the grant period when necessary.
- d. Acceptable rental agreements generally include:
  - Date of agreement
  - Terms of agreement
  - Payment details or value of in-kind contribution by a Realtor's assessment
  - Signatures of appropriate parties

2. **Utility Bills** - Acceptable utility bills generally include:

- Company name, address and phone number
- Account number
- Billing period
- Service address
- Total cost
- Breakdown of charges

3. **Client Assistance** - any direct assistance to victims:

- a. Cash assistance cannot be provided to victims
- b. Assure that all expenses are reasonable, allowable and able to have supporting documentation.
- c. Client assistance expenses requested for reimbursement must provide the date of the expense and a detailed record of the expense.
- d. VOCA cannot pay for fees or fines – Example: If a victim needs assistance with a utility bill and has late charges the late fee cannot be reimbursed.

4. Any expense claimed in this category must have a detailed receipt or invoice supporting the cost.

5. Items that are inappropriately put in this category will not be reimbursed.

6. If the agency has already been reimbursed the cost, the inappropriate allocation will need to be remedied.
7. If you are unsure about a certain item, please consult with your Grant Specialist prior to allocating the expense to VOCA.

**M. Indirect Cost Category:**

1. Indirect Cost Rate (ICR) must be federally approved or a Certified De Minimus.
2. If a subrecipient has an approved Indirect Cost Rate the below apply:
  - a. Subrecipients with federally approved ICR's that are renewed during the performance period of the grant must have the new ICR approved documentation submitted to the Financial Evaluator for review within 30-calendar days of the paperwork being received by the subrecipient.
  - b. Subrecipients utilizing the 10% DeMinimus must have a Certification of Indirect Costs on file at the time of grant application as well as the Modified Total Direct Cost (MDTC) plan.
  - c. Subrecipients who have an approved Indirect Cost Rate (either federally approved or DeMinimus) agree to:
    - i. Submit for reimbursement of the indirect costs not to exceed the approved rate.
    - ii. Apply the ICR only to actual direct costs expenditures for the reporting period.

***EXAMPLE:***

*Subrecipient utilizing the 10% DeMinimus cannot charge more than 10% ICR of actual direct costs per reporting period.*

***OR***

*\$100.00 Actual Direct Cost Expenditures for a period ≥ \$10.00 of Indirect Cost to be claimed for that period.*

- iii. Subrecipient is responsible for retaining documentation to support the charge of the ICR to the grant and will make available upon request to NCC, and other oversight agencies.
- iv. Must charge the ICR to all federal grants

**N. Unallowable Expenditures include, but are not limited to:**

1. Direct cash assistance to victims (gift cards, deposits, checks, cash, etc.)
2. Food costs outside of budgeted grocery expenses for shelters, or emergency client assistance
3. Tobacco, alcohol, trinkets advertising the agency
4. Always contact your Grant Specialist if a purchase is questionable.

**V. PERFORMANCE MEASURES**

**A. Performance Measurement Tool (PMT):**

1. The Office for Victims of Crime requires all VOCA funded organizations to complete quarterly Performance Measurement Tool (PMT) Reports.
2. These reports are completed via the federal reporting website [www.ovcpmt.org](http://www.ovcpmt.org)
3. GrantVantage will not be replacing the PMT System as it is a federal requirement for subrecipients to report data to OVC.

4. PMT reports are due every quarter to the federal government as well as the Nebraska Crime Commission.
5. **PMT Reporting Due Dates:**
  - Quarter 1 (Oct 1 – Dec 31) **DUE January 29**
  - Quarter 2 (Jan 1 – Mar 31) **DUE April 29**
  - Quarter 3 (Apr 1 – Jun 30) **DUE July 29**
  - Quarter 4 (Jul 1 – Sep 30) **DUE October 31**
6. Failure to submit these reports by the expected due date may result in suspension of grant.
7. **Changes to PMT System Contact Person:**
  - a. PMT System Contact Person changes must be made within 30-calendar days of the effective date.
  - b. It is the responsibility of the subrecipient to notify the assigned Grant Specialist if there is a change to the subrecipient's PMT System Contact Person.
  - c. The Grant Specialist will not assume that if program's Project Point of Contact is changed that the change also applies to the PMT System Contact Person.
  - d. Updating a change to the PMT System Contact Person can be made at the same time of requesting a change to the Project Personnel.
8. Please note that forgotten or lost PMT login information following its initial creation will require the subrecipient to work with the OVC PMT HelpDesk to regain access to the account.
9. For PMT technical assistance, contact [ovcpmt@usdoj.org](mailto:ovcpmt@usdoj.org) or 1-844-884-2503.

**B. Objectives and Priority Area Spending Reporting in GrantVantage:**

1. Beginning with the SFY 2020 VOCA Grants, all VOCA recipients will be required to track the progress of Priority Area Spending Outcomes through the Objectives Program Management feature in GrantVantage.
2. All Objectives & Outcomes will be reported monthly in line with the financial reporting requirements.
3. GrantVantage is not replacing the PMT reporting system, as PMT Reporting is a Federal requirement for agencies.
4. Outcome Reporting will be requested during desk reviews, on-site monitors, and/or upon request from VA Division staff.

**C. Surveys:**

1. In addition to Priority Spending Reporting in GrantVantage and the PMT System, VAD staff may send a survey to subrecipients to complete at the end of the project period.
2. These surveys are essential for VA Division to effectively complete the annual report to OVC.

**VI. MONITORING**

**A. VOCA Monitoring Plan**

1. The Office for Victims of Crime requires each State Adminstrating Agency to have a Monitoring Plan in place for VOCA funds.
2. This Monitoring Plan will determine the frequency and level of monitoring for each

VOCA recipient both financially and programmatically.

**B. Operational Assessment Tool**

1. The **Operational Assessment Tool (OAT)** is the tool utilized to determine the level of monitoring.
2. Some factors considered to determine monitoring level:
  - Number of consistent years as a VOCA recipient
  - Changes in or Turn-over of Key Grant Staff
  - Level of Funding
  - Amount of Total Government Funding Received/Managed
  - Increase/Decrease Trends of Victims Served
  - Attendance at Grant Management Training
  - Compliance with Grant Management Requirements
3. The OAT is an internal document and assessment completed by the staff within the Victim Assistance Division that are familiar with the program.
4. Data is collected and evaluated from last three years of NCC VOCA grant file records, PMT Data, and other available sources of information.
5. The OAT is reviewed on an annual basis, at which time programs will be notified of their monitoring levels.

**C. Desk Reviews**

1. Each VOCA subrecipient will receive a request letter through GrantVantage for a mandatory financial & program desk review regarding a previous reporting period.
2. Generally, subrecipients will receive a request for a desk review at least once every 12 months.
3. A **Financial Desk Review** will consist of the subrecipient submitting supporting documentation that has not already been submitted for the expenses reported during a specific reporting period outlined in the desk review request letter.
4. A **Program Desk Review** will consist of the subrecipient submitting progress on outcomes, and answering pre-determined questions that will be outlined in the desk review request letter.
5. VAD staff will determine and specify if any other information to be provided is necessary for the desk review.

**D. On-Site Reviews:**

1. VAD staff will conduct on-site reviews, or monitors, based on the determined monitoring plan for each subrecipient relevant to the Operational Assessment Tool score.
2. For monitoring purposes, subrecipients are required to make records available that support the data reported on the financial and performance reports, including, but not limited to, invoices, payroll journals, bills, receipts, cancelled checks, timesheets, travel expense reports, collaboration meeting minutes, training agendas, redacted case files, etc.

3. Prior to an on-site visit, VAD staff will send a letter to the subrecipient through GrantVantage that will explain the process and detail the information to be provided prior to and/or have available during the monitor.
4. VAD staff will make every effort possible to conduct program and financial on-site monitors together.
5. On-site visits may also include a tour of the facility when appropriate.
6. During site visits, VAD staff will check purchased equipment to ensure it has been properly identified and labeled.
7. Once the site visit is complete and VAD Staff have sufficiently reviewed all documentation, the program will be provided a letter via GrantVantage with any Corrective Action Plan items and/or recommendations.

## **VII. RECORDS RETENTION**

- A. All VOCA funded subrecipients are required to retain all grant financial records, supporting documents, statistical records, and all other records pertinent to the award for three (3) years after the closeout of the federal award or three (3) years from The Crime Commission's last federal audit, whichever is later or longer in accordance with the subrecipient's records retention policy.
- B. In the event that the VOCA federal award undergoes a federal audit, notification will be sent to your agency to advise.

## **VIII. MISCELLANEOUS GRANT REQUIREMENTS**

- A. **Single Audit Compliance:** Agencies that expend \$750,000 or greater in federal funds in a fiscal year is required to comply annually with the Single Audit Compliance regulation until the final close of the Crime Commission's VOCA federal award.
- B. **Grant Management Training:**
  - Each subrecipient must attend VAD Grant Management Training once every three years.
  - Key staff identified on the grant should attend.
  - It is required for the Program Point of Contact and Fiscal Point of Contact.
  - New subrecipients and new staff in the key positions identified above must attend VAD Grant Management Training within 12 months.
- C. **GrantVantage:** All GrantVantage users will be required to complete GrantVantage Certification every 12 months in July.
- D. **Crime Victim Reparations:**
  - Per OVC requirements all subrecipients are required to inform victims of the Crime Victims Reparations program.
  - All programs must have CVR brochures available to provide to victims and track number of applications assisted to be reported in the PMT System.
  - Please contact the CVR Program manager if your agency is in need of training or brochures.
- E. **Surveys:** OVC requires all subrecipients of VOCA to survey clients and track the results

of the surveys. If you have questions regarding surveys or need assistance with developing a survey please contact your Grant Specialist.

- F. **Publications:** All publications (ex. brochures, posters) funded in whole or in part by VOCA must have the following language:

"VOCA

*This publication was supported by **grant number** awarded by the Office for Victims of Crime, Office of Justice Programs, U.S. Department of Justice, through the Nebraska Crime Commission."*

**IX. NEBRASKA VICTIM ADVOCACY PROGRAM**

- A. The **Nebraska Victim Advocacy Program** ensures access to advocacy and direct client assistance to victims of crime regardless of location or victimization type.
- B. As a program, we are **committed to serving people affected by various types of victimization** including, but not limited to:
- DUI/DWI Victims
  - Elder Abuse
  - Adult Survivors of incest or child sexual abuse
  - Survivors of homicide victims
  - Robbery
  - Assault
- C. **Services provided by the Victim Advocacy Program** include:
- Information and Referrals
  - Personal Advocacy | Accompaniment
  - Emotional Support | Safety Services
  - Assistance with Filing Crime Victim Reparations (CVR) Claims
  - Assistance with Registration with VINE
  - Collaboration with Other Service Providers
- D. **VOCA DIRECT VICTIM FUND**
1. The intent of the **VOCA Direct Victim Fund** is to ensure access to resources to all crime victims throughout the State of Nebraska, in order to better their quality of life.
  2. If victims of crime, in your community or surrounding area, need additional assistance other than what your program can provide, the VOCA Direct Victim Fund may be able to supplement or fully cover allowable expenses not covered by Crime Victims Reparation (CVR) Program or other community resources.
  3. The VOCA Federal Grant Program funds the Direct Victim Fund.
    - a. All VOCA rules and regulations regarding allowable and unallowable expenses apply.
    - b. Refer to **VOCA 28 CFR 94.119** for a more comprehensive list of allowable direct services.



4. Please contact Julie Geise at (402) 429-1609 or at [julie.geise@nebraska.gov](mailto:julie.geise@nebraska.gov) for more information, referrals for service or, to submit a request for the Direct Victim Fund.

E. **ALLOWABLE EXPENSES** through the **Direct Victim Fund**:

- **Relocation Expense:**
  - Up to 3-months of Rent and Deposit
  - Storage
  - Moving Expenses
  - Limit One Occurrence per Victim/Family
- **Emergency Food/Transportation/Clothing/Shelter:**
  - Up to 5 nights per victim/family
  - Emergency Services may be funded at the time of the need and not reimbursed by invoice should the need be immediate and necessary to ensure the safety and well-being of the victim **AND** the program does not have funding to provide for the immediate need.
- **Replacement or Repair Services**
  - Window/Door/Lock repair or replacement service expenses
  - Must be necessary to ensure victim safety
  - Limit One Occurrence per Victim/Family
- **Transportation/Meals/Lodging Expenses**
  - **Must be incurred for the victim to participate in Criminal Justice system**
  - Compensates up to 5 nights per Victim/Family
  - Cannot be expenses incurred as a witness
- **Other Incurred Expenses:**
  - Miscellaneous or other incurred expense not mentioned above must be well-justified
  - Approved on a case-by-case basis by the Victim Advocacy Coordinator

F. **UNALLOWABLE EXPENSES** not covered by the **Direct Victim Fund**:

- Expenses incurred due to being a witness in the Criminal Justice System, even if the witness and victim are one in the same.
- Gift Cards cannot be used.
- Past-Due fees.
- Fines.

G. **PROCESS TO REQUEST FUNDS FROM THE DIRECT VICTIM FUND**:

1. Go to [ncc.nebraska.gov](http://ncc.nebraska.gov) to locate forms or contact the Victim Advocacy Coordinator.
2. **Complete the Forms for Service Expense Consideration:**
  - a. Programs may submit the Pre-Approval Form to the Victim Advocacy Coordinator, Julie Geise at [Julie.geise@nebraska.gov](mailto:Julie.geise@nebraska.gov), to discuss whether an expense is allowable or would be considered under the fund.
  - b. State the reasons for the request and how it will assist to ensure the immediate safety and well-being of the victim.

- c. In considering approval of any request that state the reason for the request to be due to *"Not enough in budget to cover expense,"* the Victim Advocate Coordinator will verify with the organization's assigned VOCA Grant Specialist and/or Financial Evaluator the status of victim funds available and expended.
  - d. Allow 5 business days for determination
  - e. Expedited decisions can be made on a case by case basis.
3. Steps after Service Expense Approval:
- a. Within **14-calendar days of expenditure**, submit invoice(s)/receipts that support the approved expense.
  - b. Itemized Invoices are required from the service provider directly and cannot come from the program or the individual requesting the fund.
  - c. Communicate with the Victim Advocacy Coordinator for direction if supporting documentation will not be available within 14-calendar days.
  - d. Late or Delayed submissions will be approved on a case-by-case basis at the discretion of the Victim Advocacy Coordinator
  - e. Verified Expenditures of the VOCA funded program/organization will be:
    - i. Reimbursed through direct deposit set up by the State of Nebraska.
    - ii. Included within, but not be earmarked or differentiated from other payments scheduled for deposit to the program/organization during that time period.

**H. IMPORTANT TO NOTE:**

- 1. **DO NOT** send any **Personally Identifying Information** (PII) for a victim through email.
  - a. All records within the Nebraska Crime Commission are public record.
  - b. **Be sure to assign a unique Victim ID# to your victim** to help assure confidentiality while maintaining a direct connection to your program's victim records.
  - c. Include the client ID# on all applicable communications and submitted documentations.
- 2. Services afforded by this fund **will not** be reflected in your Performance Measurement Tool (PMT) data report.
- 3. Your program **is not** required to show match for funds paid out.

**I. VICTIM ASSISTANCE FUND FAQ:**

- 1. What is the Victim ID?
  - The Victim ID is the identifier that you use within your program for maintaining confidentiality in reporting of a client's information. All Personal Identifying Information should be redacted from documents prior to submission to the Victim Advocacy Coordinator.
- 2. Do individuals need to be working with an agency to request funds?
  - Individuals do not need to be associated with any one program to request funds, victims may contact the Nebraska Victim Advocacy Coordinator directly if they choose.



3. Is there a certain amount allowable to any one program?
  - No.
4. Are medical expenses allowed?
  - Some medical expenses may be considered, refer to VOCA rule 28 CFR 94.119(a)(9) detailing what is and isn't allowable.
5. If we have the money in our budget to cover needed cost for the types of things listed, do we have to have approval from this program?
  - No, these expenses will be managed and monitored through your VOCA grant.

## APPENDIX A – COMMONLY USED ACRONYMS

Acronym	Definition
CVR	Crime Victim Reparations
DOJ	Department of Justice (Federal)
EEOP	Equal Employment Opportunity Plan
FCR	Federal Civil Rights
GSA	General Services Administration (Federal)
GV	GrantVantage
ICR	Indirect Cost Rate
LEP	Limited English Proficiency
MTDC	Modified Total Direct Cost
NCC	Nebraska Crime Commission
OCFO	Office of the Chief Financial Officer (Federal)
OI#10	Operating Instruction #10
OIG	Office of the Inspector General (Federal)
OJP	Office of Justice Programs (Federal)
OMB	Office for Management and Budget (Federal)
OVC	Office for Victims of Crime (Federal)
PMT	Performance Measurement Tool
SAR	Subaward Report
SASP	Sexual Assault Services Program
VAD	Victim Assistance Division
VAWA	Violence Against Women Act
VOCA	Victim of Crime Act

## APPENDIX B – GLOSSARY OF TERMS

**Allocation** - An allocation is found within a transaction that identifies different costs within the transaction. A transaction can have multiple allocations.

**Blue Ribbon Bar** - Located just below the URL address in GrantVantage, the **blue ribbon bar** is a menu bar used to access the Project Management Menu, G Man Icon, and help desk icon.

**Budget Categories** - **Budget categories** are the categories that separate the expenses within the budget. An example of budget categories would be: personnel, travel, and operating expenses.

**Budget Revision Request** – A **budget revision request** is used in GrantVantage when there is a change to project's start end date, and/or when the expenses in the budget are adjusted from the original prorated amount moving more than 5% of the total project budget dollars including match dollars.

**Budget Sub-Categories** - Sub-categories found under major categories that separate the expenses within the major categories in the budget. An example of budget sub-categories would be different positions within personnel or different operating expenses.

**Dashboard** - The **dashboard** is located on the home screen and displays an overview of budget, objective performance measures, and grant activities.

**Direct Costs** – Costs or expenses that can be identified specifically with a particular final cost objective, such as a Federal award, other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. (2CFR 200.413a).

**Drawdown** - A **drawdown** also known as a reimbursement request is a request that is made by the subrecipient that pulls all the transactions for a reporting period into a summary report for payment.

**G Man Icon** - This icon is located on the left side of the blue ribbon bar and is a shortcut to the home screen.

**GrantVantage** – A cloud-based, grant management system in which pre-award and post-award data is tracked for optimal program and financial grant management on the recipient (NCC) and subrecipient levels.

**Home Screen** - The home screen in GrantVantage will be the screen that appears after you login. It is from this screen that a project is located.

**Indirect Costs** – Costs or expenses incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. (2CFR 200.56)

**Invoice** – An **invoice** is the compilation of a month's reported transactions/expenditures that is used to request a reimbursement of the funds expended. This is the GrantVantage equivalent to the formerly used NCC Cash Report.

**Modified Total Direct Cost (MDTC)** – The expenditure or cost base to which indirect cost rates are applied. Eligible MDTC expenses include total direct salaries and wages, fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first \$25,000.00 of each subaward or subcontract. Exclusions apply. (See also 2CFR 200.68)

**NCC Grant Management Solution** – A cloud-based, application database in which the Crime Commission administers grant funding opportunities for both grant applicants and grant reviewers. This pre-award system communicates by way of data transfer with the GrantVantage post-award grant management system.

**Personally Identifiable Information (PII)** - Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. (OMB Memorandum M-07-1616)

**Program Approval Request** – A type of Project Change Request where the focus of the funded project changes or there is a change to the project's Program Point of Contact, Fiscal Point of Contact, or Authorized Official.

**Project Change Request** - A is a request to make changes to a project's budget, program, key personnel, or project period that is submitted in GrantVantage by way of a Budget Revision Request, Request Budget Change, or a Program Approval Request.

**Project Management Menu** - The **project management menu** is a menu that is found on the blue ribbon bar in GrantVantage. The project management menu is used to access different windows within the project: objectives, budgeting, and drawdowns & disbursements for example.

**Prorate** – The basis for charging an expense to a certain cost objective (i.e. grant). The basis will vary depending on the expense and available information to determine what the cost is for the benefit of the grant.

**Request Budget Change** - A budget adjustment function in GrantVantage used if a program is requesting to adjust up to 5% of the total project cost (grant funds + match) within broad cost categories (i.e. supplies, travel, operating expenses etc.) in the approved original budget.

**Single Audit** - A **Single Audit** (formerly an A-133 Audit) is an organization-wide financial and compliance audit of recipients of federal funds, such as States, local governments, universities, and non-profit organizations. A **Single Audit** is generally conducted by an independent certified public accountant or State auditor and is intended to assess whether the recipient spends federal funds properly. ([www.oig.dot.gov/oversight-areas/single-audits](http://www.oig.dot.gov/oversight-areas/single-audits))

**Transaction** – A transaction is a GrantVantage tool used for the reporting of expenditures. Approved transactions compile to create an invoice.