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**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
EXECUTIVE OFFICE OF THE MAYOR**



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**OFFICE OF VICTIM SERVICES AND JUSTICE GRANTS  
GRANT MANAGEMENT POLICIES AND PROCEDURES**



**Office of Victim Services  
and Justice Grants**

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Washington, DC 20001

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## **I. GENERAL INFORMATION**

### **1.1 Mission and Purpose**

The mission of the Office of Victim Services and Justice Grants (OVSJG) is to develop, fund, and coordinate programs that improve public safety; enhance the administration of justice; and create systems of care for crime victims, youth, and their families in the District.

In order to accomplish its mission, OVSJG coordinates and funds community-based and District agencies that serve crime victims, returning citizens and at-risk youth. Additionally, OVSJG manages efforts to reduce truancy in the District's public and charter schools, and supports juvenile diversion, mentoring, and gang intervention efforts. OVSJG is the State-Administering Agency (SAA) responsible for the direction of systemic criminal justice planning, coordination, management, research, training, and technical assistance. OVSJG also offers policy making expertise, advice, and counsel to the Executive on the role of victims and offenders in the criminal justice system and evidence-based practices to prevent violence and respond and intervene in criminal situations.

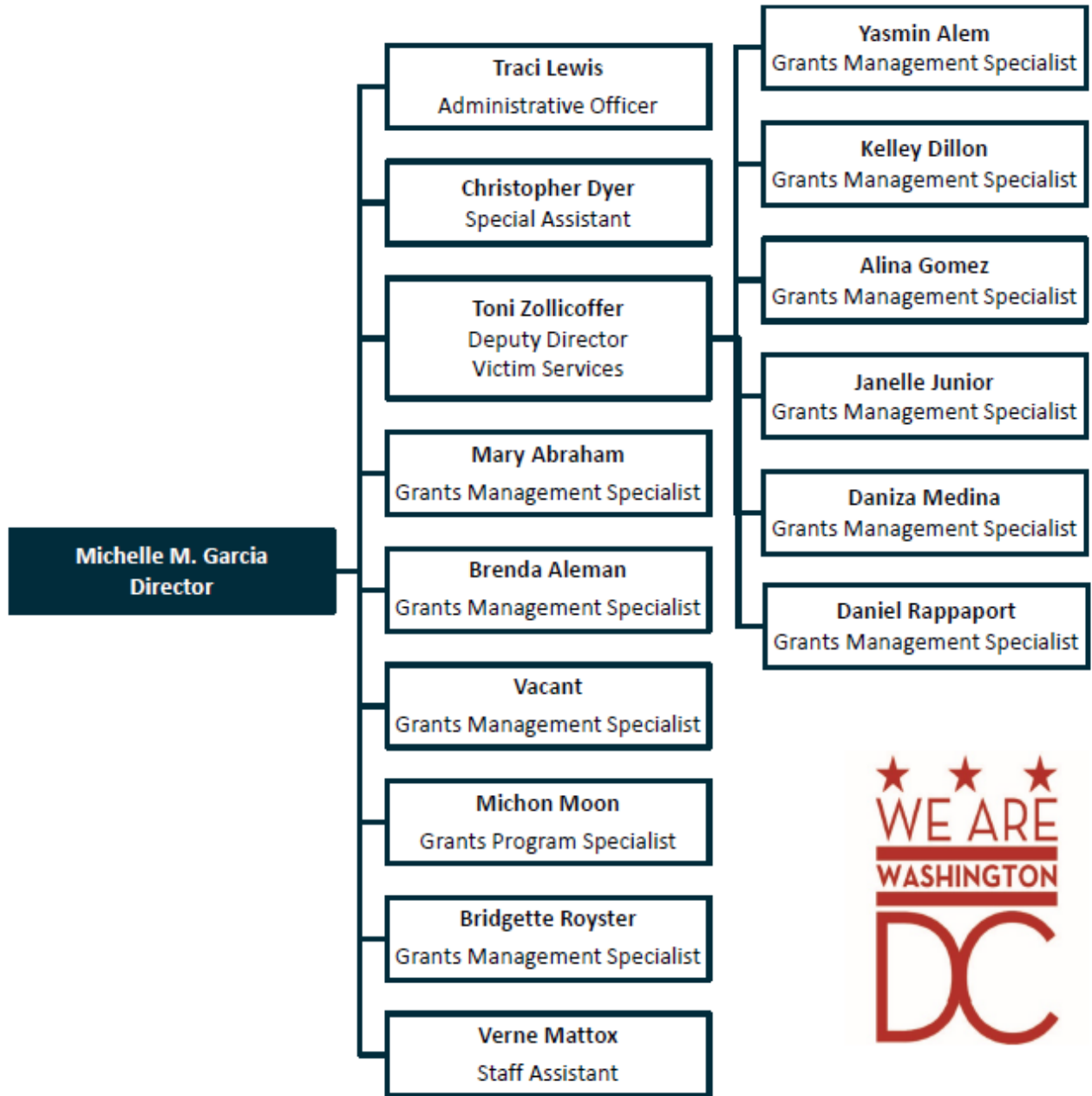
The OVSJG Grant Policies and Procedures Manual outlines the practices, policies, and procedures currently in effect for the agency's administration of Federal and locally-funded grants. This Manual presents the basic requirements for the programmatic and financial operations of grants awarded to District community-based organizations and governmental agencies. The Manual is intended to serve as a resource for grantees to understand the Agency's policies, and the specific directives and conditions found in grant awards.

This manual will be updated as needed to reflect changes in official policies and procedures adopted by the Government of the District of Columbia.

### **1.2 Structure and Staffing**

OVSJG's staff typically consists of a director; a deputy director, several grant managers and program specialists and an administrative officer. The grant managers and specialists oversee all programmatic and administrative activity on the federal and local grants in their portfolio and provide policy recommendations as needed. The administrative officer is responsible for organizing, managing, and reconciling OVSJG's agency and grant expenditures, assisting in developing and monitoring the agency budget and strengthening OVSJG's financial policies and procedures.

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OFFICE OF VICTIM SERVICES AND JUSTICE GRANTS  
ORGANIZATION CHART**



## **II. OVSJG AWARD-MAKING PROCESS**

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### **2.1 Funding Principles**

OVSJG uses the following principles to guide its funding decisions:

1. Grant awards will be consistent with the Mayor's priorities and federal funding purposes and requirements.
2. OVSJG prioritizes funding that falls within a continuum of services, i.e. each grant applicant has a responsibility to work with other funded programs to best serve the needs of their clients.
3. Funded programs will have objective, concrete, measurable outcomes; include formal procedures for evaluating progress towards those outcomes; and exhibit a commitment to continuously improve the program.
4. OVSJG funding will be primarily used to support existing programs; as a resource to launch or spark creative initiatives, policies and practices; promote capacity building and system reform efforts; and assist the District in funding statutorily required programs.
5. OVSJG will concentrate funding on agencies and organizations that are responsible administrators of awarded funds and comply fully with:
  - a. OVSJG programmatic and financial requirements, and
  - b. Local and federal laws and requirements.
6. OVSJG will seek to ensure that every funded initiative achieves outcomes that improve the District's justice system, strengthen services for crime victims, reduce truancy and juvenile delinquency, and give returning citizens increased opportunities to lead successful lives.

### **2.2 Competitive Awards**

1. The policy of the government of the District of Columbia is that, as a general rule, all funds be awarded on a competitive basis. There are exceptions to this policy, which may include but are not limited to, the following:
  - a. The funding source or grant award already establishes the recipient;
  - b. Legal and award requirements define eligibility in such a way that there is only one eligible applicant;
  - c. There is already one recognized coalition of service providers through which the targeted population can be effectively served;
  - d. The funds are awarded as part of an extension of the original grant;
  - e. OVSJG has unobligated funds from an original grant that it wishes to grant to the original award recipient(s) or another recipient for the stated purpose of the program;
  - f. The terms of a grant permit OVSJG to add or modify grant awards;
  - g. The original award document specifically allows it; or
  - h. The director or her/his designee determines that the purpose and goals of the project will be best served by awarding funds on a non-competitive basis, for

example, if time limitations require that funds be expended without an application process.

2. OVSJG may issue an award to an unsolicited proposal if:
  - a. The agency has unobligated funds remaining due to unusual or unanticipated factors;
  - b. The applicant has a program or project that significantly advances OVSJG's mission in an area identified as an agency priority;
  - c. The proposal involves the contracting of proprietary skills or technology that are limited in availability; or
  - d. The applicant brings to the grant program matching resources (cash or in-kind) equivalent to the match assistance required, if any.

### **2.3 Request for Applications Preparation Process**

1. OVSJG publishes throughout the year Requests for Applications (RFA) with its grant-making priorities and shares them with the general public and potential applicants.
2. OVSJG's RFAs identify:
  - a. The concrete goals and outcomes that OVSJG wants each initiative to achieve;
  - b. Required programmatic components for potential award recipients;
  - c. Application requirements and submission process; and
  - d. OVSJG funding guidelines and conditions.
3. In order to develop its award making initiatives and associated RFAs for the upcoming fiscal year (in addition to those carried over from previous fiscal years), the OVSJG director or her/his designee may solicit input from a cross section of stakeholders in the District on:
  - a. The key challenges and opportunities facing the system;
  - b. Current reform initiatives; or
  - c. Suggestions to identify areas where a targeted investment of resources could make a significant impact.
4. OVSJG drafts separate RFAs for each funding initiative. Each RFA shall include the following components and information:
  - a. Background/general information;
  - b. Availability of funds and award limits;
  - c. Eligibility criteria;
  - d. Eligible program activities;
  - e. Restrictions in use of funds;
  - f. Request for program goals, objectives, activities, performance measurements, reporting and evaluation plan;
  - g. Application review criteria;
  - h. Application deadline, as established by the OVSJG Director or her/his designee;
  - i. Proposal instructions;
  - j. Attachments (applicant profile/forms/certifications, assurances, budget, spending plan, etc.); and
  - k. Any additional requirements per District and/or Federal rules and regulations.

5. RFAs may contain contingency clauses stating that:
  - a. OVSJG reserves the right to make changes to the RFA based on any clarifications in the regulations, legislative changes, or funding level fluctuations;
  - b. Funding for any sub-grant is contingent on continued funding from OVSJG's funding source;
  - c. OVSJG reserves the right to accept or reject any or all applications if it determines it is in its best interest to do so;
  - d. OVSJG reserves the right to issue addenda and/or amendments subsequent to the RFA process;
  - e. OVSJG shall not, in any event, be liable for any costs incurred in the preparation of applications in response to an RFA;
  - f. OVSJG may conduct pre-award site visits to verify information submitted in the application, provide technical assistance, or determine if the proposed facilities are appropriate for the proposed services;
  - g. OVSJG may require the applicant to enter negotiations, or submit a revised budget or programmatic schedule as part of its grant-making process;
  - h. In the event of conflicts or ambiguity between the terms and conditions of the RFA and any applicable Federal or District law, regulation, or policy, the legal or regulatory provisions shall prevail; or
  - i. Applicants are solely responsible for complying with all relevant laws and regulations.
6. The release of an RFA does not commit OVSJG to issue an award and does not confer any rights to its applicants.

## **2.4 RFA Release Process**

1. OVSJG typically publishes funding opportunities in the DC Register, the District's Funding Alert, and its website.
2. OVSJG usually issues a Notice of Funding Availability (NOFA) to alert the community of the availability of funds. The NOFA is a brief summary description of the funding initiative; amount of funding available; eligible recipients; and instructions for obtaining a copy of the RFA.
3. Whenever OVSJG releases a NOFA, it will typically be published in the DC Register and the District's Funding Alert at least one (1) week before the release of an RFA. OVSJG will also attempt to publish both the NOFA and RFA in its own website.
4. In addition to the aforementioned sources, OVSJG will try to distribute the NOFAs/RFAs through its network of community-based and funding organizations, which may include OVSJG's current sub-grantees and a number of community-based organizations, funders, listservs and resource agencies that serve or represent a cross section of potential applicants.

## **2.5 RFA Questions and Bidder Conference**

1. All RFAs will have a grant manager serving as point of contact. The name and contact information of this person will be included in the RFA.
2. OVSJG may host bidders' conferences for interested applicants in an RFA. Conferences can be live or web-based. The date, time, and location of the bidders' conferences will be identified in the RFA for interested attendees.
3. Unless specifically mentioned in the RFA, attendance at a bidders' conference will not be a prerequisite for submitting an application, but strongly encouraged.
4. Throughout the application solicitation period, OVSJG can only respond to application questions in the manner specified in the RFA. Responses to any substantive questions that were not covered at the bidders' conference will be added to OVSJG's website.

## **2.6 Application Submission Process**

1. Each RFA will outline the specific instructions that applicants must comply with in order to have OVSJG consider their application.
2. As a general rule, all applicants are required to:
  - a. Obtain a Dun & Bradstreet D-U-N-S Number and create a U.S. Government System for Award Management (SAM) account prior to submitting an application for funding with OVSJG. This information must be included in all applications. Applicants are required to maintain their D-U-N-S and SAM accounts active and in good standing in order to receive funding.
  - b. Conform to and include all documentation required in the RFA. OVSJG will not consider any application that does not include all required documentation, is not submitted by the due date, or does not comply with the instructions set in the RFA.
  - c. Not exceed the established maximum number of pages set in the RFA.
  - d. Submit all originally produced documents and attachments required in the RFA with application margins of no less than one inch; a font size of 12-point; and numbered pages. A table of contents is recommended.
3. Applicants must complete all required Certifications prior to receiving an award, as specified in the RFA. Certifications will be treated as a material representation of fact upon which reliance will be placed when OVSJG determines to award the applicable transaction or grant.
4. The Certifications will require applicants to attest that they are:
  - a. The persons authorized by their organization to negotiate with OVSJG. All individuals with that capacity must be named, and their title, address, and phone number must be provided;
  - b. Able to maintain adequate files and records and meet all reporting requirements;
  - c. Current on payment of all Federal and District taxes, including Unemployment Insurance taxes and Workers' Compensation premiums. This statement of certification shall be accompanied by a certificate from the District of Columbia Office of Tax and Revenue (OTR) stating that the entity has complied with the



- filing requirements of District of Columbia tax laws and has paid taxes due to the District of Columbia, or is in compliance with any payment agreement with OTR;
- d. Financially and administratively able to provide and manage the proposed services and ensure an adequate administrative, performance and audit trail;
  - e. Able to secure a bond, in an amount not less than the total amount of the funds awarded, against losses of money and other property caused by fraudulent or dishonest act committed by any employee, board member, officer, partner, shareholder, or trainee;
  - f. Not proposed for debarment or presently debarred, suspended, or declared ineligible, as required by Executive Order 12549, "Debarment and Suspension," and implemented by 2 CFR 180, for prospective participants in primary covered transactions and is not proposed for debarment or presently debarred as a result of any actions by the District of Columbia Contract Appeals Board, the Office of Contracting and Procurement, or any other District contract regulating Agency;
  - g. Able to secure the financial resources and technical expertise necessary for the production, construction, equipment and facilities adequate to perform the grant or subgrant, or the ability to obtain them;
  - h. Able to comply with the required or proposed delivery or performance schedule, taking into consideration all existing and reasonably expected commercial and governmental business commitments;
  - i. In possession of a satisfactory record performing similar activities as detailed in the award or, if the grant award is intended to encourage the development and support of organizations without significant previous experience, that the applicant has otherwise established that it has the skills and resources necessary to perform the grant;
  - j. In possession of a satisfactory record of integrity and business ethics;
  - k. Able to have the necessary organization, experience, accounting and operational controls, and technical skills to implement the grant, or the ability to obtain them;
  - l. In compliance with the applicable District licensing and tax laws and regulations;
  - m. In compliance with the relevant provisions of the Drug-Free Workplace Act;
  - n. Meeting all other qualifications and eligibility criteria necessary to receive an award under applicable laws and regulations;
  - o. Keeping all fiscal records in accordance with Generally Accepted Accounting Principles (GAAP) and account for all funds, tangible assets, revenue, and expenditures whatsoever; that all fiscal records are accurate, complete and current at all times; and that these records will be made available for audit and inspection as required;
  - p. Agreeing to indemnify, defend and hold harmless the Government of the District of Columbia and its authorized officers, employees, agents and volunteers from any and all claims, actions, losses, damages, and/or liability arising out of any grant or subgrant from any cause whatsoever, including the acts, errors or omissions of any person and for any costs or expenses incurred by the District on account of any claim therefore, except where such indemnification is prohibited by law.

5. Award recipients shall provide in writing the names of all its insurance carriers and the type of insurance provided. Before any award can be signed or executed, award recipients shall provide OVSJG a copy of the binder or cover sheet of their current policy for any policy that covers activities that might be undertaken in connection with performance of the grant, showing the limits of coverage and endorsements.
6. All award recipients' policies, except the Workers' Compensation, Errors and Omissions and Professional Liability policies, that cover activities that might be undertaken in connection with performance of the award, shall contain additional endorsements naming the Government of the District of Columbia, and its officers, employees, agents and volunteers as additional named insured with respect to liability abilities arising out of the performance of services under the award. The award recipient shall require their insurance carrier of the required coverage to waive all rights of subrogation against the District, its officers, employees, agents, volunteers, contractors and subcontractors.
7. OVSJG reserves the right to establish additional certifications for award applicants and recipients.

## **2.7 Applicant Budget Preparation Guidelines**

1. As a general rule, OVSJG will not pay for fundraising positions or functions.
2. As a general rule, applicants requesting funding for non-programmatic personnel (for example, administrative or executive) must be cognizant that these positions may only be funded by OVSJG to the percentage that the final award (if approved) is a percentage of the organization's budget or the time that the employee can justify as direct work on the project. For example, if an OVSJG award is 25% of an organization's budget, the organization will only be permitted to request funding for these non-programmatic positions up to 25%. If a non-programmatic employee can justify more than 25% of their time on the project being funded, the employee shall provide proof of that work through regularly executed timesheets. That being said, it is OVSJG's sole discretion to approve funding for all requested positions, and to what extent.
3. Applicants must include any planned personnel salary increases in their original application for funding. If these are not included, OVSJG reserves the right to disallow future requests for reimbursement of salary increases.
4. Notwithstanding the aforementioned, OVSJG is willing to meet with an awardee to discuss potential reprogramming of funds to subsequently include unforeseen personnel costs. Any salary adjustments approved in this manner will only be authorized as of the date of approval of a Grant Adjustment Notice.
5. Grant Applicants may request in their application to be reimbursed their negotiated indirect cost rate agreement (NICRA). To be reimbursed its NICRA, the organization must include their agency determination letter and relevant documentation in their application for funding. Alternatively, grant applicants can request to be reimbursed the prevailing *de minimis* rate established by the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Requirements"), dated December 26, 2013 and codified at 2 C.F.R. Part 200, as amended. The Uniform Requirements are available at

<https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>.

6. OVSJG reserves the right to request documentation of indirect cost expenses incurred by an award recipient prior to reimbursing a NICRA or *de minimis* rate.

### **III. APPLICATION REVIEW PROCESS**

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#### **3.1 Initial Application Review**

1. Grant managers shall conduct an initial review of submitted applications to ensure the application is complete prior to forwarding the application for peer review.
2. A complete application is one that includes:
  - a. All elements required in the RFA.
  - b. Verification that the organization has not been suspended or disbarred from receiving Federal or local contracts, if applicable.
3. In order for an application to be considered, it must be within the scope of the RFA, address the needs identified by the District, aim to cover any gaps in services identified in the RFA, build or sustain a core service, align to the OVSJG priorities, and meet all requirements.
4. OVSJG reserves the right not to review incomplete applications.

#### **3.2 Application Review Process**

1. Award applications that are complete and meet the RFA's criteria will be reviewed and scored by OVSJG or its designees. OVSJG will create a form that reflects the specific programmatic components and key criteria highlighted in the RFA.
2. The OVSJG director or assigned Review Coordinator may identify panelists to review each RFA when necessary. The review panelists should be experts in the fields related to the RFA, and ideally, familiar with OVSJG procedures and the systems and services landscape of the District of Columbia. Review panelists should include a mix of government and community based organization representatives. For juvenile justice grants, it should also include members of the Juvenile Justice Advisory Group's grant review committee.
3. Review panelists may be compensated depending on availability of funds.
4. District government employees may serve as reviewers. However, they cannot be compensated, and must provide a written authorization from their supervisors to serve as a reviewer.
5. Panelists are expected to review all their assigned applications for a particular RFA.
6. Review panelists are required to submit an application and resume or curriculum vitae (CV) to OVSJG in order to be considered. Subsequently, once OVSJG has selected peer reviewers, they must complete and submit a Master Supplier Form, and W-9 form. OVSJG electronically sends the review panelists: a letter describing the review process policies and procedures, a copy of the RFA, scoring form, and applications for review.
7. Peer reviewers selected to evaluate an application for funding may do so as long as she/he does not have a conflict of interest with that applicant. To that effect, they shall sign a certification stating that they have no personal or professional vested interest in the organizations that submitted applications in response to the RFA peer reviewer has a conflict of interest and is ineligible to review an application when:

- a. The reviewer or her/his spouse, partner, sibling, or parent is named in the application as a person having a role in the project.
  - b. The reviewer or her/his spouse, partner, sibling, or parent would receive a direct financial benefit of over \$1,000.00 if the application is funded.
  - c. The reviewer or her/his spouse, partner, sibling, or parent has been an employee, paid consultant, or board member with the applicant during the past year.
  - d. The application includes a letter of support, reference letter, or memorandum of understanding from the reviewer.
  - e. The reviewer has an indirect interest from the applicant institution of over \$10,000.00 in income, stock, or fees during the course of the last fiscal year or award period.
  - f. The reviewer has a significant role in another application submitted in the same solicitation process.
8. A peer reviewer must disclose a conflict of interest to OVSJG as soon as she/he identifies the conflict. OVSJG will then decide if there is a conflict, and if so, on the best course of action to resolve it.
  9. If a peer reviewer feels that she/he has a conflict with an agency for another reason not listed above, she/he should disclose the perceived conflict to OVSJG as soon as possible for advice and resolution.
  10. Reviewers should be given no less than two (2) weeks to review applications and return the completed scoring and comment forms to OVSJG.
  11. The OVSJG grant management team is responsible for synthesizing the peer review comments to determine the highest rated applications for each RFA.
  12. While the peer review process is ongoing, the OVSJG director and grant management team conduct their own review of all applications for funding to identify the strengths and weaknesses of each one, respond to any questions or suggested changes; identify any missing required attachments; and establish any special conditions for applicants that can be funded such as restrictions and/or additions to the applicant's proposed budget and/or work plan.
  13. After all scores are received, the OVSJG director or peer review coordinator may schedule meetings with each review panel to discuss the applications and ratings received, with the majority of time focused on those applications with scores that place them in an indeterminate funding status given the number of awards that will be made and the funds available. Review panelists may help OVSJG identify the applications' strengths and weaknesses; key questions and additional information needed; project changes or adjustments recommended for the application to be worthy of funding; and identify consensus preliminary funding decisions when possible.
  14. The names, scoring, and recommendations of the review panel are advisory only, and not deemed to be public information. A summary of peer reviewer information is publicly available upon request following the process outlined in OVSJG's Dispute Resolution Policy.

15. All final funding decisions rest solely with the OVSJG director. Decisions are made based on OVSJG's priorities and the impact that this application might have on advancing the agency's mission.
16. OVSJG reserves the right to accept or deny any or all applications if it determines that it is in the best interests of the agency to do so.

### **3.3 Applicant Risk Factor Assessment**

1. OVSJG will conduct an annual review of agencies' requests for funding, in addition to grantees' programmatic and financial reports and publicly available information in order to determine whether, if their proposal is selected for funding, they are a Low, Medium or High-Risk award recipient for the agency.
2. Factors considered for determining risk level include:
  - a. Award amount
  - b. Prior experience managing same or similar awards
  - c. Substantial changes to personnel or the budget in a fiscal year
  - d. Timely submission of financial and program performance reports
  - e. Results of audits
  - f. Number of request for advance(s)
  - g. Site visit findings
3. Depending on the risk level assessed, OVSJG may require award recipients or applicants selected for funding to comply with one (1) or more of the following special conditions in order to receive funding:
  - a. Provide monthly financial statements that include, at a minimum, balance sheet, cash flow, or Profit and Loss Statements.
  - b. Provide an organizational budget and any subsequent revisions to it.
  - c. Provide project cost documentation upon request. This may include but is not limited to payroll journals, timesheets, vendor invoices, cancelled checks, credit card statements, and compliance with internal procurement policies.
  - d. Deliver Accounting Journal Entries and Ledgers upon request.
  - e. Offer copies of other grant agreements upon request.
  - f. Complete additional Performance Measure, Financial, or Program Reports.
  - g. Report its staffing plan and immediately report new hire updates.
  - h. Immediately report any changes to their Personnel or Financial Manuals.
  - i. Verify reported data and outcomes with backup information.
  - j. Any other requirements determined by the OVSJG director or her/his designee.
4. In the event that an award recipient is designated as a high-risk grantee, the grant manager and OVSJG director or her/his designee will meet with the recipient's programmatic and fiscal point of contacts and executive director to discuss the findings and develop a Corrective Action Plan with concrete deliverables and a timeline. Award recipients that exhibit continued noncompliance will receive notification through a formal letter that their funds will be de-obligated.
5. Award recipients that have an award de-obligated due to noncompliance may be declared ineligible to receive an award from OVSJG in the next fiscal year.

### **3.4 Award Notification**

1. OVSJG will attempt to inform applicants of their application results within fifteen (15) business days of finalizing review of all applications.
2. Applicants whose applications are denied can request more information regarding OVSJG's decision by following the agency's Dispute Resolution Process, available in Appendix B of this Manual.
3. Applicants who receive a Letter of Intent from OVSJG will be notified of the amount OVSJG is considering to award them. The Letter will inform the applicant of any other forms, documents, or changes that need to be added or revised to the original application in order for an award to be granted.
4. In the event that an applicant does not submit the requested changes outlined in the Letter of Intent in the required timeframe or to the satisfaction of OVSJG, the Letter of Intent can be rescinded and the application denied.
5. If the applicant declines the Letter of Intent or if OVSJG rescinds it, the OVSJG director will determine how to best use the competed funds.
6. Receiving a Letter of Intent does not grant any rights or benefits to an applicant. OVSJG reserves the right to reduce the amount outlined in a Letter of Intent at any time before a Grant Agreement is signed. Furthermore, any award can be reduced by OVSJG after its issuance in accordance with this manual and Federal and District laws, rules and procedures, or if funding to OVSJG is reduced.
7. All awards are contingent upon OVSJG receiving funds to carry out a project.

### **3.5 Award Package**

1. Once the requirements of the Letter of Intent are met, OVSJG will issue an award package that contains a description of the award's instructions and any award special conditions, which may include additional requests for information or revisions to the original application and budget.
2. The award letter will include an Award Agreement and other related documents, which must be signed and returned in accordance to the terms in the Award Letter.
3. Grant managers will assign each award recipient an award number in the appropriate OVSJG form and place this number on all recipient award forms. Award recipients must also include this number in their post-award reports.
4. All documents in the award package must be reviewed carefully by the receiving agencies as the award terms and conditions are legally binding, and agencies' failure to comply with these terms and conditions may affect their award status.
5. Organizations that fail to submit the required paperwork on time may have their awards revoked by OVSJG.

### **3.6 Registration with the Office of Contracting and Procurement**

1. Applicants receiving an award from OVSJG for the first time must establish a new vendor account with the District of Columbia's Office of Contracting and Procurement (OCP) Procurement Automated Support System (PASS), before any payments can be disbursed.

- The process to create an account can be found at OCP's website, <http://www.ocp.dc.gov>.
2. Once the applicant registers with OCP, they must also register with the ARIBA Supplier Network (ASN). Information on how to establish an AS account can be found at <http://ocp.dc.gov/page/vendor-registration-electronic-solicitations-ocp>.

### **3.7 Registration with the Department of Consumer and Regulatory Affairs**

1. Any applicant or contractor with OVSJG that expects to receive a contract or award of at least \$2,500.00 in payments from the agency during a one year period is required to obtain a business license with the Department of Consumer and Regulatory Affairs (“DCRA”) prior to signing the agreement.



## **IV. POST-AWARD REQUIREMENTS AND COMPLIANCE**

### **4.1 Award Recipient Orientation and Training**

1. All award recipients' executive director (or similar position), programmatic and/or financial points of contact may be required to participate in an OVSJG orientation and grant management training to be held before the end of the first quarter of the grant award period.
2. The training will include information on OVSJG's financial and programmatic expectations; the financial reimbursement process, forms and documentation; programmatic reporting process and forms; and any special conditions.
3. OVSJG will offer trainings on specific topics throughout the year as needed. Training or information sessions that address OVSJG policies or procedures may be mandatory.
4. Upon request, OVSJG can provide technical assistance (TA) to grantees on the Civil Rights' Audit requirements, Limited English Proficiency and Equal Treatment Regulations, among other topics.

### **4.2 Award Recipient Files**

1. Award recipients are required to maintain a grant award file that includes all the documents kept by OVSJG, which include:
  - a. The final project application, budget, signed certifications and assurances, award letter, and award agreement;
  - b. EEOP waiver form;
  - c. Requests for reimbursement and support documentation;
  - d. Match forms and support documentation;
  - e. Equipment and electronic purchase and sole source justification forms when applicable;
  - f. Programmatic and performance measure reports;
  - g. Site visit assessment findings;
  - h. Grant adjustment requests and notices; and
  - i. All other significant grant correspondence and documents.OVSJG grant managers may review this grant file during a site visit.
2. OVSJG, the DC Inspector General, and the U.S. Department of Justice, or any of its authorized representatives, have access for purposes of audit and examination, any books, documents, papers, and records of the award recipient related to the grant award at any time. This may include information that is otherwise confidential, although OVSJG will make every effort to limit the review of identifiable data. In addition, award recipients must maintain all grant records for at least three (3) years after the completion of the grant period or until an audit is completed and/or any litigation is

resolved and all questions arising from these reviews are resolved. Grant records must be sufficient for the DC Inspector General to audit them and determine whether the costs incurred and billed are allowable under the terms of the grant award.

3. Award recipients that received \$750,000.00 or more in Federal or District funds over a year are required to conduct a single audit in accordance with the provisions of the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Requirements"), dated December 26, 2013 and codified at 2 C.F.R. Part 200, as amended. The Uniform Requirements are available at <https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>. Failure to do so shall be considered a significant violation of a Grant Agreement and may result in cancellation of an Award.
4. Award recipients that receive an award of \$750,000.00 or more from OVSJG can request in its program budget to be reimbursed for all its Single Audit costs. If this is requested, the recipient must sign a certification acknowledging that they are not requesting or using funds from any other source to pay for the Audit. If the recipient is only requesting partial reimbursement, they must sign a certification stating which other government agencies or foundations will be contributing to the Audit's costs, and the amount that each of them will provide.
5. If the award recipient receives an award of less than \$750,000.00, but, is nevertheless required to prepare a single audit due to a combination of other federal or District awards, the recipient can request funds to cover the single audit's costs up to the percentage that the award is relative to the total of \$750,000.00. For example, if the OVSJG award is for \$250,000.00, the award recipient can request in its program budget to receive up to 1/3 of its single audit costs.
6. Award recipients must account for their expenditures in accordance to generally accepted accounting principles recognized by the Financial Guide set forth by the DOJ Office of Justice Programs, Office of the Chief Financial Officer, as amended.
7. Award recipients that receive between \$250,000.00 and \$749,999.99 in District and federal funds during a year and are not otherwise required to prepare a Single Audit shall have an independent accountant prepare and file at the end of the grant award's fiscal year a financial statement report covering the award recipient's last 12 months prior to the final month of the award period containing:
  - a. An Income Statement (or Statement of Financial Position);
  - b. A balance sheet;
  - c. Reconciliation of cash balances;
  - d. Reconciliation of stockholder equity (if the awardee is a for-profit entity) and
  - e. An independent review of management's internal controls.
8. Award recipients receiving and expending between \$25,000.00 and \$249,999.99 of OVSJG's funds during a fiscal year and are not otherwise required to prepare a Single Audit shall prepare and file at the end of the grant award's fiscal year a financial statement covering the award recipient's last 12 months prior to the final month of the award period that contains:
  - a. An income statement (or Statement of Financial Position);

- b. A balance sheet;
  - c. A reconciliation of cash balances;
  - d. A review of management's internal controls.
9. It is the responsibility of the award recipient to close out all award accounting records at the end of the project, and submit a final report using the format approved by OVSJG.
10. The audit reports and annual financial statements required under this Section are due within six (6) months of the conclusion of the award recipient's fiscal year. Copies of these reports shall be sent to OVSJG within thirty (30) days of receipt.

#### **4.3 OVSJG Programmatic Responsibilities and Oversight**

1. The OVSJG director and grant managers are responsible for ensuring that award recipients are:
  - a. Achieving appropriate progress towards meeting the objectives, outcomes, performance measures, and timelines identified in their award terms and conditions;
  - b. Accurately and completely collecting and reporting required data and outcomes;
  - c. Appropriately spending the District's funds in accordance with the parameters of the grant agreement;
  - d. Addressing startup and implementation challenges; and
  - e. Assisting their sub-grantees with addressing these challenges through training, technical assistance, and/or corrective actions as needed.
2. OVSJG grant managers shall aim to meet with each award recipient at least once during the first quarter of the grant award period to review project progress; obtain and review programmatic requirements; respond to all inquiries and discuss project activities and any grant related issues. This meeting can be conducted in person, online, or by telephone.
3. OVSJG grant managers are expected to check on the programmatic and financial status of their award recipients in relation to the size of the grant award and the level of award recipient's risk level. For high-risk award recipients, the grant manager is required to check in with the programmatic point of contact and the organization's executive director on a monthly basis or more frequently as needed.

#### **4.4 Grant Adjustment Requests and Notices**

1. Award recipients must obtain prior written approval from OVSJG for all financial or programmatic modifications to any portion of the approved budget or scope of work. OVSJG shall approve changes in an official Grant Adjustment Request/Notice Form. For proposed programmatic changes, a Grant Adjustment Request must be submitted prior to the proposed change. Requests to make changes to a budget must be approved prior to the date of expenditures affected by the change. A Grant Adjustment Request/Notice must be requested by an award recipient for:
  - a. Any change in the scope of the project;
  - b. Any change in the staff working on the project;

- c. Any change to the project site;
  - d. Any request to change the approved project budget.
2. Award recipients that experience significant programmatic or financial grant award challenges that adversely affect the timeliness, quality implementation, and/or objectives/outcomes of the grant award must submit to their grant manager an electronic Grant Adjustment Request form as soon as the problems are identifiable. Potential reasons for submitting this form include but are not limited to:
  - a. Significant startup or staff hiring/retention challenges;
  - b. Lack of personnel to carry out the project;
  - c. Lack of referrals;
  - d. Program model adherence/implementation challenges;
  - e. Stakeholder/partnership conflicts; or
  - f. Financial expenditure and/or accounting problems.
3. Award recipients experiencing such problems must identify in the request the specific, detailed steps they are taking to remedy the problem. They may also submit a formal grant adjustment from OVSJG at this time in the event that the problem cannot be resolved.
4. If an award recipient needs to submit a Grant Adjustment Request in the final quarter of a grant period, the request must be made no later than thirty (30) days prior to the end of the project. If said date falls on a weekend or holiday, the final date shall be the next work day. Requests submitted after that date will not be approved, unless the change is needed due to an unforeseen emergency.
5. OVSJG grant managers will aim to review all received forms and subsequently provide feedback to award recipients within ten (10) business days of receiving the form. For identified problems, if needed, the grant manager will outline specific tasks with timelines for addressing the identified problems in addition to offering technical assistance resources requested or recommended. Award recipients must make and report to OVSJG sufficient progress towards accomplishing these tasks or face further actions.
6. The grant manager will determine whether to approve or deny a Grant Adjustment Request. If approved, the grant manager will complete and send a Grant Adjustment Notice outlining the approved adjustments. Grant managers will save copies of all Grant Adjustment Requests and Grant Adjustment Notices.
7. Grant Adjustment Requests will generally be approved if the:
  - a. Grant Adjustment Request will assist the award recipient in more efficiently or effectively carrying out the goals and objectives of the grant;
  - b. Reason for the Grant Adjustment Request was beyond the scope of control of the award recipient;
  - c. Grant Adjustment Request is submitted prior to August 31 of the relevant fiscal year;
  - d. Failure to approve the Grant Adjustment Request would cause significant hardship to the award recipient or significantly impede its ability to successfully complete the goals and objectives of the grant.

8. All personnel funded in whole or in part under a Grant Award must be identified by name. Using an OVSJG Grant Adjustment Request/Notice Form, the Authorized Official or Project Director must give written notification within fifteen (15) days of any changes in project personnel. If this is not followed, the grantee will only be reimbursed for this person's expenses as of the date that they notified OVSJG of the change.
9. Award recipients must obtain prior written approval from OVSJG for all requests for changes or modifications to any portion of the Grant Award. Requests must be submitted within thirty (30) days of the change or occurrence and require the written approval of OVSJG to become effective. Failure to submit this request within the 30-day period may result in suspension of payment. In addition, all requests must be submitted on the approved OVSJG Grant Adjustment Request/Notice Form *provided* to the Grantee at the start of the Fiscal Year.

#### **4.5 Advance Payments Policy**

1. As a general rule, award recipients can only receive payments on a reimbursement basis. However, agencies that OVSJG has identified as core service agencies may request an advance payment to cover operating expenses for up to a 30-day period. Advance requests in excess of 30 days will be considered upon request and on a case by case basis and upon OVSJG determination that this is urgently needed. Repeated advance requests may affect a grantee's risk status assessment.
2. Core agencies are those offering services that are:
  - a. Available 24/7/365 for District residents and visitors; and
  - b. Considered to be emergency services in nature and responsive to acute incidents of trauma or crisis; or
  - c. Any other entity determined by the director.
3. OVSJG reserves the right to suspend, deny, or limit advance payments to high-risk award recipients or any core agency that is not in compliance with its reporting requirements.
4. Advance payments must be deposited and maintained in insured accounts whenever possible. Furthermore, interest earned on advance payments deposited in interest-bearing accounts must be remitted annually to the DC Treasury in the manner prescribed by OVSJG. However, if this presents an undue hardship to the agency, they may submit a written request to OVSJG's Director requesting a waiver of this requirement.

#### **4.6 Compliance with Financial Requirements**

1. Award recipients are expected to abide by all financial terms and conditions of their grant award as outlined in their award agreement. Among others, the key terms and conditions for award recipients include ensuring that expenditures are in line with their approved

final budget and budget categories, expenditures are for allowable costs and follow government standards on travel and consultant rates.

2. OVSJG grant managers will track the pace and nature of award recipients' expenditures, and if sub-grantees are not expending funds in a timely fashion, the grant manager may request further documentation, including a detailed spending plan for the remainder of the award period. By the end of the third quarter, award recipients that have not spent approximately 75% of their grant award and cannot provide a compelling explanation for how they will ensure all grant funds are expended may have all or part of their funds deobligated. In this case, OVSJG may identify another recipient to receive this funding for the remainder of the grant period. OVSJG does not need the permission of the grantee to deobligate funds.
3. Award recipients are expected to spend the full amount of their grant award within the identified grant award period, with extensions to this period approved only in exceptional circumstances. Award recipients that expect to expend funds in a disproportionate manner throughout the grant period or that experience challenges in spending grant funds should bring this to OVSJG's attention as soon as they are aware of the situation. In addition, OVSJG reserves the right to unilaterally decrease the amount of the award in the event that an award recipient cannot provide any assurance that the funds awarded will be spent, or if the recipient has a significant amount of unexpended funds by the end of the Fiscal Year's 3<sup>rd</sup> quarter and cannot justify the lack of expenditures.
4. Award recipients that fail to spend down their grant award by the end of the award period may be classified as a medium or high-risk award recipient for the next fiscal year, and significantly jeopardize their ability, for at least the next fiscal year, to secure additional awards from OVSJG.
5. Whenever established in a federal award program, award recipients may provide a cash and/or in-kind organization match to OVSJG's grant award. In these cases, award recipients must meet the full amount of this match by the end of the grant award period in a manner consistent with their final grant budget; and must provide quarterly or monthly updates to OVSJG on their match progress through their Financial and Programmatic Reports to OVSJG. Similar to reimbursement requests, they must provide OVSJG with financial documentation supporting all reported match expenditures, and the OVSJG grant manager will track and ensure that they meet their match in an appropriate and timely manner.
6. Award recipients that fail to meet their match requirements by the end of the award period may be reclassified as medium or high-risk award recipients, and significantly jeopardize their ability, for at least the next fiscal year, to secure additional awards from OVSJG.
7. Award recipients that make individual purchases of equipment **or supplies** in excess of \$5,000.00 must develop an internal inventory system to record these purchases. In addition, award recipients are strongly encouraged to keep an inventory of all computers, cameras and electronic equipment purchased with grant funds. Upon request, award recipients must provide a report to OVSJG that includes the details of these purchases, their location, and the name of the staff person(s) using them.

8. During site visits, OVSJG will verify the existence and use of, in accordance with grant purposes, all property and equipment included in the Equipment and Capital Expenditures Purchase Form.
9. Award recipients must identify and adhere to their own codified procurement policies and procedures regarding contracts with other vendors when using OVSJG grant funds. In addition, OVSJG strongly encourages award recipients to use District Certified Business Enterprise (CBE) companies as their vendors. CBEs can be found at <http://dslbd.dc.gov/service/find-certified-companies>.
10. Award recipients are required to submit to OVSJG a request for approval for any sole-source sub-contract in excess of \$150,000.00. OVSJG will not reimburse this purchase if it was not approved prior to the selection of the contractor or expenditure of any funds.
11. Award recipients that have spent less than 75% of their supplies and operating expenses budget through the end of the Fiscal Year's third quarter must submit a Grant Adjustment Request explaining why these purchases have not been made. They will also submit a purchasing plan and request for pre-approval for any purchases to be made in the final quarter of the grant award period that exceed \$500.00. Otherwise, OVSJG may deny reimbursement of the purchase, even if it is included in the grant award budget. Furthermore, OVSJG reserves the right to deobligate these funds if the award recipient fails to submit a spending plan by the end of the third quarter.

#### **4.7 Programmatic Reports and Performance Measures**

1. Award recipients will submit electronic quarterly programmatic reports to their OVSJG grant manager following the agency's programmatic report template. These reports will include a progress report on all objectives and outcomes as appropriate, any additional objectives and outcomes approved in their Grant's Award Terms and Conditions, and any required additional federal or District performance measures.
2. Completed programmatic reports shall be submitted in electronic form to the OVSJG grant manager by the fifteenth (15) day of the month following the end of the quarter. The grant manager will review the reports to ensure all requested information is included and identifies any questions or concerns. Shall there be any; the award recipient will be required to respond.
3. If the report submitted by the award recipient identifies significant implementation challenges, the grant manager will initiate a conversation to discuss and develop a plan for resolving these concerns. This discussion and a resolution plan should be finalized no later than one month after receiving the initial report.
4. OVSJG does not consider a reimbursement request complete and will not submit any requests for payment until all corresponding quarterly programmatic reports have been received and approved.
5. In the event that the Department of Justice requires specific reports or information, OVSJG grant managers will attempt to incorporate these into the quarterly reporting template provided to award recipients at the start of the award period.

#### **4.8 Data Reports**

1. OVSJG may require award recipients to complete data and performance measure reports in addition to the regular programmatic and financial reports. All award recipients will be required to provide these as necessary.
2. Failure to provide these data reports may lead to a suspension of funds, re-classification of the award recipient as high-risk, or termination of the grant agreement.

#### **4.9 Reimbursement Requests**

1. Award recipients shall submit reimbursement requests that include required forms through OVSJG's approved system.
2. New and high-risk grantees must submit supporting documentation for each reimbursable item requested.
3. Award recipients are required to submit reimbursement request packages on a quarterly basis or a monthly basis, at the award recipient's preference. However, the award recipient must specify their preference within fifteen (15) days of the start of their grant period.
4. Completed packages are due no later than the 15th day of the month following the end of the agreed reimbursement period. Repeated failure to submit reimbursement packages in a timely manner may result in the elevation of the award recipient's risk status.
5. Final reimbursement requests are due no later than October 10<sup>th</sup>.
6. Requests must be submitted online using OVSJG's Financial Reimbursement Database request and tracking system. Once submitted, OVSJG grant managers will review the request, may solicit additional information, and approve or reject it.
7. Award recipients receiving a request for additional information must respond within five (5) business days. If the reimbursement total is adjusted by OVSJG, the OVSJG grant manager notifies recipients in writing by listing unallowable expenses via OVSJG's approved system.
8. Award recipients requesting payment for personnel overtime expenses must include in their reimbursement request the organization's overtime payment policy, and internal documentation showing compliance with it. Otherwise, payment for overtime expenses will be disallowed.
9. Award recipients requesting payment for personnel or consultants hired through a temporary employment agency must have received prior approval from OVSJG to use an agency. Otherwise, the reimbursement will not be approved. Furthermore, once a person has been hired through an agency, the award recipient must inform OVSJG about the hire to OVSJG in the same manner as a regular personnel change. Otherwise, the agency will be reimbursed for the temporary employee's expenses from the date they communicated the hire to OVSJG.
10. Award recipients may request reimbursements for operating expenses related to the maintenance of telephone, computer or internet support services, or maintenance of a facility. However, these expenses will be limited up to the percentage that OVSJG's award is of the recipient's total budget or as necessary to support the specific project



being funded. An award recipient may submit a written request asking for a waiver of this requirement in the event that this presents an undue hardship to the ongoing operations of the agency. OVSJG has the sole right to deny this request.

11. Award recipients that submit three (3) late or incomplete requests within their grant award period may be designated as high risk grantees and be in danger of having their award de-obligated, and jeopardize their ability for at least the next fiscal year, to secure additional awards from OVSJG.

#### **4.10 Disallowed Costs**

1. Disallowed costs are expenses charged to an award that are subsequently rejected by the original funder or OVSJG for not complying with the terms of the award agreement.
2. Disallowed costs might be identified by the District or the original grantor.
3. If OVSJG notifies an award recipient that any disbursements made under a grant or subgrant are disallowed costs, the award recipient shall be given the opportunity to justify the questioned costs prior to a final determination. If OVSJG or the grantor ultimately determines that the costs are disallowed, reimbursement in full to the District of said amounts must be made by the award recipient within forty-five (45) calendar days after final official notification from the District, unless otherwise agreed in writing.
4. If the reimbursement is not received in full in the manner agreed upon by OVSJG and the award recipient, the recipient shall receive no further funds from the agency until such time as the reimbursement is fully repaid.
5. Agencies found to have disallowed costs may be classified as high-risk grantees.

#### **4.11 Reimbursement Payments**

1. OVSJG shall review submitted requests, required forms, and supporting documentation to ensure that submitted costs are allowable under the award agreement and comply with requirements of the funding source.
2. Once OVSJG has verified that the reimbursement package contains only allowable costs, OVSJG approves the reimbursement request. OVSJG will make every effort to forward it within five (5) business days to the Office of the Chief Financial Officer (OCFO) for processing and disbursement.
3. Once the OCFO Accounts Payable Division approves the payment, award recipients can expect to receive a check (at the address listed on the organization's Vendor Registration Form and Master Supplier Form or via electronic transfer (if the recipient has submitted an ACH automatic deposit form) within 30 business days in the amount approved by OVSJG. or an electronic transfer (if the recipient has submitted an ACH automatic deposit form).
4. If the grantee does not receive a check within 31 business days of the request being approved by the OVSJG grant manager, the grantee shall contact their Grant Manager by telephone or email for an investigation into the matter. NOTE, For the purposes of the Late Payments Act, the calendar starts running on the date that the Accounts Payable Division approves the request.

#### **4.12 Fraud or Misconduct Complaints**

1. If an OVSJG employee has reason to believe that an award recipient is committing financial or programmatic fraud or any other kind of misconduct or harassment in an OVSJG partially or fully funded organization, or receives a complaint from a third party describing or alleging similar activities, the employee shall report this suspicion to the OVSJG director. The director will review the allegation, and if the Director believes there is reason to believe that fraud or other misconduct may have occurred, within 48 hours, the director may do one or more of the following:
  - a. Suspend temporarily all reimbursement to the award recipient and notify their programmatic and financial points of contact as well as the executive director of this suspension and the potential fraud investigation;
  - b. Conduct an investigation into the matter;
  - c. Submit an electronic report to the Department of Justice, Office of the Inspector General via their required Grantee Reporting Form and Alert the District's Office of the Attorney General, if required;
  - d. Request a meeting with the complainant to receive more information on the allegations; or
  - e. Request a meeting with the award recipient to receive more information on the allegations. The OVSJG director or her/his designee shall conduct an inquiry into the allegations without identifying the source of the allegations.
2. The OVSJG Director will work with authorities to address the allegation, as required. If there are no findings of fraud, abuse, or other misconduct, the Director will inform the award recipient, who may then resume its grant award and project activities. If it is determined that fraud has occurred, OVSJG will determine the status of the grant award and notify the award recipient's executive director and board president of its findings and next steps.
3. Organizations that knowingly commit fraud or other financial misconduct with OVSJG funds may have their award immediately terminated and be ineligible to receive OVSJG funding for up to the next three (3) fiscal years.
4. Organizations that unknowingly commit fraud or other financial misconduct with OVSJG funds may be declared ineligible to receive OVSJG funding in the next fiscal year, even if they have already received a letter of intent or award.

#### **4.13 Discrimination Complaints**

1. Complaints of impermissible discrimination should be submitted via email or letter to either the subgrantee grant manager or the agency civil rights coordinator, the director of OVSJG.
2. In the event that OVSJG receives a complaint against an award recipient for discrimination, the agency civil rights coordinator will immediately assign staff to investigate the matter. OVSJG will ensure that staff are trained regarding the responsibility to refer discrimination complaints or potential discrimination issues to the complaint coordinator as soon as the alleged discrimination comes to light.
3. The assigned OVSJG staff will review the complaint internally, and refer it to the

DC Office of Human Rights (OHR) for investigation when appropriate, and notify the complainant of this action. In this case, OVSJG will work with OHR to resolve the complaint.

4. If the grant is supported by federal funds, OVSJG will report the matter to the Office for Civil Rights (OCR), Office of Justice Programs, U.S. Department of Justice, and notify the complainant of this action. OVSJG will also notify the complainant that they may file a complaint directly with the Office for Civil Rights. See Appendix C for the Procedures for Responding to Discrimination Complaints Against Department of Justice-funded Subgrantees.
5. OVSJG reserves the right to suspend any award until the matter is investigated and its findings are communicated to the award recipient.
6. All award recipients are required to report to OVSJG within 48-hours of notice any complaints of discrimination that have been filed against them. Award recipients must update OVSJG on the status of the complaint and its resolution.
7. Failure to report a complaint is considered to be a significant violation of the award agreement. Whenever this occurs, OVSJG has the option to terminate the award agreement or classify the grantee as high risk.
8. An award recipient that is found to have engaged in intentional discrimination may be declared ineligible to receive OVSJG funding, even if they have already received a letter of intent or award.
9. OVSJG will monitor subrecipients to ensure that each subrecipient is providing notification to its employees and beneficiaries that the subrecipient does not discriminate on the basis of race, color, national origin, religion, sex, disability, or age; and that it does not retaliate against persons who file a discrimination complaint or lawsuit, who complain to the state administering agency or the subrecipient about discrimination; or who participate in a discrimination proceeding, such as being a witness in a complaint investigation or lawsuit.

#### **4.14 Risk Level Assessment**

1. OVSJG will conduct an annual review of grantees' performance and reports in order to determine whether they are a low, medium or high-risk award recipient, as defined in Section 3.3 of this Manual.
2. Depending on the assessment, OVSJG may require the award recipient to comply with one or more of the following special conditions in order to continue receiving funds:
  - a. Provide monthly financial statements that include, at a minimum, balance sheet, cash flow or Profit and Loss Statements;
  - b. Provide an organizational budget and any revisions to it;
  - c. Provide upon request Project Cost documentation – which may include but are not limited to payroll journals, timesheets, vendor invoices, cancelled checks, credit card statements, and compliance with internal procurement policies;
  - d. Deliver Accounting Journal Entries and Ledgers upon request;
  - e. Offer copies of other grant agreements upon request;

- f. Complete additional Performance Measure, Financial or Program Reports;
  - g. Immediately report any changes to their Personnel or Financial Manuals;
  - h. Verify reported data and outcomes with backup information; or
  - i. Any other requirement as determined by the director.
3. Failure to comply with any Special Condition may result in award termination and make the program ineligible to receive continued or increased funding.

#### **4.15 Desk Reviews, Site Visits, and Audits**

1. OVSJG may review award recipients' program activities and expenditures at any time to determine whether activities and expenses are allowable, consistent with the approved budget and project activities, and conform to required grant conditions. Any unallowable activities may affect an award recipient's risk status and unallowable expenses will not be approved for reimbursement, or will require award recipients to return funds to the District.
2. Grant managers may conduct desk reviews, site visits, and audits of award recipients at anytime.
3. Award recipients selected for a desk review will receive a letter requesting information that the agency must provide to OVSJG. After the desk review is concluded, grant managers will send a close-out letter within sixty (60) days that summarizes the process undertaken, informs any findings that require immediate action, provides recommendations for improvement and communicates whether their risk assessment level has changed as a result of the audit.
4. The frequency of site visits will depend on the award recipients' risk level. OVSJG will schedule routine site visits in the following manner:
  - a. Low risk grantees may receive site visits once every three (3) years.
  - b. Medium risk grantees may receive site visits once every two (2) years.
  - c. High risk grantees may receive site visits once a year or more frequently as required.
5. New grantees will receive a site visit in the first year of funding from OVSJG.
6. Site visits may include one or more of the following components:
  - a. Grant managers will send a letter to selected grantees prior to the site visit. The letter will inform the agency about the documentation it must provide before and during the visit.
  - b. During the site visit, grant managers will review all requested programmatic and financial reports. They reserve the right to ask for additional documentation during and after the site visit.
  - c. Grant managers will also interview designated programmatic and financial contacts, as well as other personnel as determined necessary.
  - d. At the conclusion of the site visit, the Grant Manager may conduct an exit interview with the agency's leadership to discuss the visit and outline the next steps in the process.
  - e. Grant managers may conduct a grant file desk review in addition to the site visit to identify any missing or incomplete documents and to review programmatic and financial outputs and outcomes.

- f. After the visit, grant managers will send a report that summarizes the visit, informs any findings that require immediate action, provides recommendations for improvement, and a plan to follow-up on requested technical assistance. The Report will also inform the award recipient whether their risk assessment level has changed as a result of the site visit.
7. If significant concerns are identified in the close-out report, the award recipient will be required to provide a written response that outlines their corrective action plan to address the identified concerns within a timeline to be determined by OVSJG.
8. A hard copy of the site visit or desk review findings and any follow-up correspondence shall be placed in the award recipient's agency file.

#### **4.16 Corrective Actions and De-obligation**

1. Award recipients that consistently fail to comply with significant administrative, financial and/or programmatic requirements may be designated as a high risk award recipient, which may hamper the continuation of their current grant award and ability to secure continued or increased funding.
2. Upon being designated a high-risk grantee, the grant manager and OVSJG director or her/his designee will meet with the recipient's programmatic and fiscal point of contacts and executive director to discuss the findings and develop a Corrective Action Plan with concrete deliverables and a timeline. Award recipients that exhibit continued noncompliance will receive notification through a formal letter that their funds will be de- obligated.
3. Award recipients that have an award de-obligated in this manner may be declared ineligible to receive an award from OVSJG in the next fiscal year.
4. Award recipients whose awards are prematurely terminated are subject to the same requirements regarding audit, recordkeeping, and submission of reports as a project that runs for the duration of the project period.
5. Grant managers and the OVSJG director may identify an eligible agency that can receive the de-obligated funds so these can be spent down by the end of the award period. Per District policy, these funds may not need to be re-competed.

#### **4.17 Award Extensions**

1. It is OVSJG's policy that no Grant Award Extensions will be authorized for programs using local appropriations if the duration takes them past the end of the District's fiscal year that the award was granted for.
2. An award extension may be requested for programs using federal funds, if requested ninety (90) days prior to the end of the original grant period. Prior to approving this extension, program managers must check with the OVSJG director or her/his designee to determine whether approval is appropriate. If there are funds available for a specific grant and time frame, the administrative officer must initial her/his approval prior to the grant manager's approval of the request. If the resources are not available, the grant manager can request a modification to cover

the extension. Once this is approved, the request may be granted.

3. An award extension may be requested for the following reasons:
  - a. Delay in programming.
  - b. Extraordinary circumstances.
  - c. Delays in receipt of funding.
4. For grant adjustments, an award recipient must obtain prior written approval from OVSJG in order to implement any desired change.
5. Other grant award extensions requests may be considered by the agency's Grant Managers upon written submission.

## V. APPENDICES

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### Appendix A: Regular Grant Cycle Timeline

The following grant cycle provides a general timeline of OVSJG's grant award year. OVSJG strives to manage its federal and local grants within these timeframes; however, dates are subject to change given federal or local circumstances, and may be different for specific awards. For specific details, please read each RFA when published and an award's terms and conditions.

1. April: Release of OVSJG principal Requests for Application (RFA)
2. May: Funding applications due
3. June 1 – July 30: Application review and scoring
4. August 1 – August 30: Application decisions and Letters of Intent issued
5. September 1 – 30: Awards issued
6. September 30: Award documents and signed agreements must be on file
7. October 1: Start of fiscal year and grant period
8. By December 15: Award recipient orientation and training
9. January 15: First quarterly reports due
10. April 15: Second quarter reports due
11. June 30: Final grant adjustment requests due
12. July 15: Third quarter reports due
13. October 10: Fourth quarter and final reports due
14. October 30: Award files will be reviewed and closed

## **Appendix B: OVJSG Dispute Resolution Policy**

This section is intended to provide guidance to applicants on how OVSJG will address any disputes related to its RFA competitive award process.

### **A. Notification**

Applicants should be provided a timely written notification that they were not selected as an award recipient based on one or more of the following rationale:

1. The applicant was determined to be ineligible for award consideration as a result of the eligibility criteria established in the Request for Applications (RFA);
2. The applicant was not selected for an award based on their ranking/scoring after an evaluation of their application against the scoring criteria contained within the RFA;
3. The applicant had been classified by OVSJG as a high-risk grantee and failed to implement the reforms necessary to remove itself from this risk level;
4. The applicant has a deficient programmatic or financial reporting record with OVSJG;
5. The applicant has exhibited inadequate internal controls;
6. The applicant has failed to comply with requirements in prior OVSJG awards;
7. The applicant's proposal does not appear to be feasible;
8. The applicant lacks a track record of collaboration with other community service providers or following best practices with regards to the delivery of services;
9. The application was not selected for funding due to lack of award money available; or
10. The applicant was not selected for an award based on other grants management considerations.

### **B. Non-Compliance with Submission Requirements**

Applications deemed to be non-compliant with the RFA's technical submission and formatting requirements will not be eligible for an award. Failure to receive an award for not complying with these requirements is not subject to this dispute resolution procedure.

### **C. Notification of Funding Decision**

OVSJG will make its best efforts to notify its funding decisions to applicants within fifteen (15) calendar days of concluding its process. The notification will indicate whether the application was successful, unsuccessful, or ineligible for consideration based on a review of the criteria established in this Policy.

### **D. Request to a Debriefing**

1. An applicant has ten (10) calendar days from the date the notification letter is sent to request in writing a more elaborate explanation of OVSJG's decision.
2. The request shall be sent to the following address:  
Office of Victim Services and Justice Grants  
ATTN: Grant Application Inquiry  
441 4<sup>th</sup> Street, NW, Suite 727N  
Washington, DC 20001



It may also be submitted via email to: [ovsig@dc.gov](mailto:ovsig@dc.gov).

3. The applicant must include a copy of the *Applicant Profile* with any correspondence. Otherwise, the Request will not be considered.
4. In its written request, the applicant must include a detailed statement of the legal or factual basis for the dispute, the remedy that the applicant is seeking, information on how to communicate with the applicant or its representative and any documentation relevant to its position.
5. The grant manager receiving the request must promptly notify the OVSJG director or her/his designee so that a Grant Award Dispute Official (GADO) can be designated to respond to the Request.
6. Debriefings may be provided orally or in writing at the discretion of the applicant organization. Oral debriefings will be scheduled at a mutually agreeable time and place as soon as practicable after receiving the debriefing request.
7. The program debriefing responses should be limited to the following, as appropriate:
  - a. Identify the threshold eligibility criteria that the applicant failed to meet and explain how the applicant failed to meet this criterion.
  - b. Provide the applicant with the numerical scoring/ranking for the applicant application.
  - c. Provide the applicant with summarized information on the strengths and weaknesses of its application under the evaluation criteria published in the RFA. Reviewer specific comment and information are not discoverable, as they are considered to be part of the deliberative process.
  - d. Provide responses to relevant questions regarding whether the evaluation and selection procedures contained in the announcement were followed and why the applicant was not selected for an award. The debriefing will not compare their application to other applications. Furthermore, the names of the reviewers or their unedited comments are not public information, and thus, will not be disclosed.
  - e. Discuss those grant management issues that precluded the applicant from receiving an award, if any.
8. The GADO may consult with the program officer and OVSJG director to determine whether it is in the agency's best interest to delay the award process pending resolution of the request.
9. The GADO will review all the information relevant to the request, and with concurrence of the director, issue a timely written decision. The decision is final and not subject to further review.

## **Appendix C: Procedures for Responding to Discrimination Complaints Against Department of Justice-funded Subgrantees**

### **I. Policy**

All individuals have the right to participate in programs and activities operated by OVSJG subgrantees regardless of race, color, national origin, sex, religion, disability, and age. The OVSJG will ensure that its subgrantees are in compliance with the following statutes and regulations, as applicable:

- A. Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin in the delivery of services (42 U.S.C. § 2000d), and the U.S. Department of Justice (DOJ) implementing regulations at 28 C.F.R. pt. 42, subpt. C;
- B. The Omnibus Crime Control and Safe Streets Act of 1968, which prohibits discrimination on the basis of race, color, national origin, religion, or sex in the delivery of services and employment practices (34 U.S.C. §§ 10228(c) and 10221(a)), and the DOJ implementing regulations at 28 C.F.R. pt 42c subpt. D;
- C. The Victims of Crime Act of 1984, which prohibits discrimination on the basis of race, color, national origin, religion, sex, or disability in the delivery of services and employment practices (34 U.S.C. § 20110(e));
- D. The Juvenile Justice and Delinquency Prevention Act of 1974, which prohibits discrimination on the basis of race, color, national origin, religion, or sex in the delivery of services and employment practices (34 U.S.C. § 11182(b)), and the DOJ implementing regulations at 28 C.F.R. pt. 31;
- E. The Violence Against Women Act (VAWA) of 1994, as amended, 34 U.S.C. § 12291(b)(13), prohibiting discrimination in programs either funded under the statute or administered by the Office on Violence Against Women, both in employment and in the delivery of services or benefits, based on actual or perceived race, color, national origin, sex, religion, disability, sexual orientation, and gender identity) (referring to the Safe Streets Act for enforcement.
- F. Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (29 U.S.C. § 794), and the DOJ implementing regulations at 28 C.F.R. pt. 42, subpt. G;
- G. Title II of the Americans with Disabilities Act of 1990, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (42 U.S.C. § 12132), and the DOJ implementing regulations at 28 C.F.R. pt. 35;
- H. Title IX of the Education Amendments of 1972, which prohibits discrimination on the basis of sex in educational programs (20 U.S.C. § 1681), and the DOJ implementing regulations at 28 C.F.R. pt. 54;
- I. The Age Discrimination Act of 1975, which prohibits discrimination on the basis of age in the delivery of services (29 U.S.C. § 6102), and the DOJ implementing regulations at 28 C.F.R. pt. 42, subpt. I; and
- J. The DOJ regulations on the Partnerships with Faith-Based and Other Neighborhood Organizations, which prohibit discrimination based on religion in the delivery of services and prohibit organizations from using DOJ funding on inherently religious activities (28 C.F.R. pt. 38).

These laws also prohibit agencies from retaliating against an individual for taking action or participating in action to secure rights protected by these laws.

## II. Definitions

- A. "Complainant" refers to the person or persons who initiate a complaint.
- B. "Complaint Coordinator" refers to the OVSJG employee designated by the OVSJG to receive and process complaints of discrimination filed against OVSJG subgrantees. The Complaint Coordinator is Michelle Garcia.
- C. "Discrimination" refers to unfair treatment of one or more individuals due to race, color, national origin, sex, religion, disability, or age.
- D. "Retaliation" refers to adverse actions by an agency because an individual engaged in a protected activity, such as opposing a discriminatory practice or participating in a discrimination complaint process.
- E. "Subgrantee" refers to an organization which receives a DOJ grant award that is administered by the OVSJG.

## III. Complaint Procedures

An employee, applicant, or beneficiary of a OVSJG subgrantee may raise a complaint alleging discrimination by a OVSJG subgrantee with any OVSJG employee. If the complaint is verbal, the OVSJG employee receiving the complaint shall instruct the complainant to document the complaint in writing. The OVSJG employee shall ensure that the written complaint includes specific information regarding the perceived discrimination such as the name of the subgrantee and the involved employees and the date, location, and nature of any alleged discriminatory actions. The OVSJG employee receiving the complaint shall then forward the complaint to the OVSJG Complaint Coordinator, Michelle Garcia.

The Complaint Coordinator will review the complaint and will refer it to the District of Columbia Office on Human Rights (OHR) for investigation. The Complaint Coordinator will notify the complainant in writing of this referral. This letter will include notification that the complainant may also file a complaint directly with:

Office for Civil Rights (OCR)  
Office of Justice Programs  
U.S. Department of Justice  
810 7<sup>th</sup> Street NW,  
Washington, DC 20531.

Upon resolution of complaint, OVSJG will compile each individual complaint into a complaint package (which will consist of the subgrantee's written complaint; the date OVSJG staff forward the complaint to the Complaint Coordinator; the date the Complaint Coordinator referred the complaint to the District of Columbia Office on Human Rights (OHR) for investigation and a summary of the resolution). The complaint package will be filed in OVSJG's office located at: 441 4<sup>th</sup> St. NW, Suite 727N, Washington, DC 20001.

## IV. Training

These procedures will be posted in the OVSJG office and will be kept on the shared document drive used by all employees. OVSJG will distribute written copies of complaint procedures to all OVSJG staff in an in-person training. This training will explain the complaint procedures and inform OVSJG staff of their responsibility to refer any and all complaints regarding discriminatory actions by subgrantees to the Complaint Coordinator, Michelle Garcia. As Complaint Coordinator, Michelle Garcia will be responsible for ensuring OVSJG staff understands the procedure and their responsibility.

**V. Policies and Procedure Manual**

All subgrantees must incorporate into their policies and procedures manual how they will inform their employees and/or beneficiaries in what way to file a complaint of discrimination against the subrecipient, and that employees and beneficiaries can also file a complaint with the Office of Victim Services and Justice Grants or the Office for Civil Rights.