Clarification for Victim Assistance Grantee PMT Reporting

Issue

The purpose of this PMT clarification is to reconcile conflicting instructions previously issued by the Office for Victims of Crime (OVC) regarding the entry of financial data into the subgrant award report (SAR). Specifically, OVC previously instructed state administering agencies and sub-recipients to correct financial errors in theirs SARs within 30-days of noting the error. In many instances, this led to SAAs and sub-recipients attempting to correct SARs after the award period ended in an effort to reconcile financial discrepancies discovered during the close-out process.

At this time, the PMT is unable to allow changes to a SAR after a federal award has closed. This is the result of a policy decision that was made when the system was first being developed. Based on feedback resulting from this issue, this policy decision is being reconsidered. While it is unlikely that anything will change for the current fiscal year, steps are being taken to implement a change for future fiscal years. The below information applies to current practices for reporting in the OVC Performance Measurement Tool (PMT).

PMT Use Generally

The OVC PMT was designed to aid states in providing the required subgrantee and performance data to OVC.   This means that the PMT was designed as a "*secondary data system*." The PMT is not designed to act as a case management, financial management, award management, or other primary data system. States and subgrantees should use primary systems - such as CiviCore, VSTracking, Apricot, or other systems - to manage their cases, finances, and awards while making every effort to ensure the PMT data is an accurate representation of these primary systems.

PMT data can be used to check compliance with reporting requirements and subgrantee performance, especially during monitoring activities to ensure data is accurately transcribed into the PMT. PMT data should not be used as the primary data source for an organization's clients, finances, or personnel. Organizations should keep official records of clients, finances, and personnel outside of the PMT in primary data systems.

PMT data should be regularly verified by subgrantees and states as well as during monitoring activities by comparing it with primary data sources. This helps to ensure that PMT data is an accurate representation of subgrantee performance. When there are substantial discrepancies between the PMT and primary data sources, the PMT should be updated to reflect the primary data source.

Financial Data in the PMT

The OVC PMT collects a range of data from grantees including some financial data, even though the PMT is not a financial reporting tool. As such, the PMT should not be used to monitor the financial aspects of a subaward. It should be regularly updated to match the amounts found in the state's financial system.

There are five places in the PMT where financial data is requested. Requirements for each section is below.

- **Subaward Amounts**. States should enter the amount of OVC Victim Assistance Funds **subawarded** to the subgrantee in the SAR. If a subaward allocation amount is subsequently changed, that allocation value should be updated in the PMT within 30 days of the change taking effect. At this time, SARs cannot be changed after a federal award has closed.
- **Match Requirements**. States should enter the pledged dollar amount of cash or value of in-kind match to support the subaward.
- **Priority and Underserved Allocations**. States should enter the amount of each subaward **allocated** to each of the priority and underserved areas at the start of the award. If there are changes to how a subaward will use funding over the life of the award, the allocations should be updated within 30 days of the change taking effect. Expenditures for the priority and underserved areas should be tracked via the state's financial system and records should be available for review during site visits and other grant monitoring activities. In no case should a state calculate these allocations post-hoc based on the number of victims served under the award. Allocations are, by definition, made prior to funding being expended.
- **Administrative and Training Funds**. States should enter the amount of each federal award that is **allocated** for administrative and training purposes on the Administration: Federal Award List page. Administrative and training allocations should be updated at least annually, before the annual report is submitted via GMS. At federal award closeout, administrative and training amounts should match the expenditures reported on the FFR.
- **Budget and Staffing**. States or subgrantees should enter subgrantee budget information in question 11 of the SAR covering the same time period of the subaward. For example, budget data for a six-month subaward with a project start date of January 1 and project end date of June 30 should cover this same time period. Estimates based on past funding are allowable.

Questions

If you have any questions concerning this clarification, please contact your OVC program specialist. If you have questions about PMT reporting, please contact the PMT help desk at ovcpmt@usdoj.gov or 1-844-884-2503.