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Transcript: OVC Webinar Victim Compensation VCC Form 2024

Jeff Blystone:

Good afternoon everybody and welcome to the Office for Victims of Crime Victim Compensation Certification, best practices in completing the form. Before I turn it over to Joel, there's some housekeeping that we want to go through, maybe for those of you who are not familiar with Zoom. So this presentation is being recorded and it'll be provided via the LMS after the session and it will also be on OVC's website as well. Please feel free to turn your cameras on as you participate in this webinar, if you feel comfortable. Please remain muted unless called upon to speak. If you would like to use the closed captioning, you can select that option by using the CC icon at the bottom of the screen, and actually it says... It's captions, so you can choose captions. There are Spanish interpreters for this meeting. To access interpretation, if you click on the three dots for more and select interpretation, and then you choose the Spanish channel, they will be there to translate into Spanish if you wish to have that done. And there's a photo there that kind of shows how to get to that more screen.

If you're having difficulties hearing, if you're listening via the computer, you can click on the carrot next to the audio icon and you can make adjustments to your speakers there. If you still can't hear, you can go to the meeting invitation and scroll down and call into one of the phone numbers that are provided. Some Zoom features are chat, closed captioning, and Q&A. The live captioning, you want to click on the show captions to access the captions. If you need technical assistance, feel free to add that into the chat box and send your issue to one of the hosts and we will address that issue. If you have questions about the presentation, we ask that you submit them through the Q&A box.

Oh, sorry. Questions will be answered at the end of the presentation. If the Q&A box is not visible, you can click on the three dots for more and select Q&A. And as I said, a recording of the webinar will be made available on the OVC website. Some engagement tools. What's the difference? You have the chat where the participants can use the chat to engage throughout today's webinar. However, just please be sure to submit your question and answers in the Q&A function. And the Q&A is where you can submit your questions for Joel for response during the Q&A. So if you please click on the Q&A button at the bottom right corner of your Zoom screen and type in your question, that'll be answered at the end of Joel's presentation. And so with that, I'm going to turn it over to Joel Hall, who's the Deputy Division Director at the Office for Victims of Crime. So Joel, welcome.

Joel Hall:

Thank you very much. Thank you, Jeff. And welcome everybody. My name is Joel Hall and I'm the Deputy Division Director for the State Victim Resource Division, AKA the formula teams, one of the reasons why you're here. I'm looking down the list here. I see a lot of names I'm familiar with, and for those who have seen my presentation many times before, well welcome back. And for new people welcome, again for the first time. So for the new people, why don't you put in the chat, say, "Hello, I'm new. This is my first VCC presentation and I'm new to filling out the form." So put those names down in the chat box and I will take special attention to make sure any questions that you have get answered so that you can fill out the form correctly and efficiently. And you don't have any site visit findings, so that's always good. Next slide, Jeff.

All right, our learning objectives today is to understand how to accurately complete the VCC form. The VCC form, Victim Compensation Certification form is a very important tool at OVC. It is used basically to determine what the formulas are for not just compensation, but for assistance. There's some

compensation, as you may be aware, is reimbursed up to a certain amount through the victim compensation form, and then after the compensation programs, the first bite out of the CVF, Crime Victims Fund, then the remaining balance, that is remained, is then given to the victim assistance programs based on a formula based on population from the Census Bureau. So that's how we do this. So it's very important. The quicker you get these forms in and we get them processed, the quicker we can get you your allocation tables for FY25. Another learning objective is to learn best practices to ensure that victim compensation programs are using appropriate accounting principles to keep track of expenses.

Many times as we work through these different slides, you're going to hear me kind of give hot tips or kind of think FYI. These are things to pay attention to. This is things that we, as grant managers, have noticed when we come out to do site visits with you, or unfortunately more importantly, the OHE office of Inspector General notices as they come and have gone to your agencies. Many of you have probably experienced OIGIS already or have in the past. So for the new people, it's very important that we really work to help Maria and Haley understand some of the lessons that we've learned in the past. All right, next slide.

All right, certification requirements. Each state, including our four territories, four territories, have actually compensation programs too. You see Guam, Puerto Rico, Virgin Islands, and I'm missing somebody. So oh, District of Columbia, how could I do that? That applied for the Victims of Crime Act and victim compensation funding. So what you're going to do is every year we submit this annually. For right now we're doing it outside the system. We're continuously working on building a way to fill out this form inside the system. For those who've been around for a while, we used to be able to do that in our old grants management system due to the development issues with JustGrants, and we have not been able to do that. We're getting closer this year. I'm hoping this next year that'll be the case. But for now, we do everything remotely and that's why you'll start noticing some emails like give it to your grant manager directly instead of putting in the system. We'll put it in there for you.

But soon I'm hoping we'll have an automated system that you can actually put it into the JustGrants system. Make sure you retain records. 2 C.F.R. 200, supporting the data entered into the certification form. One of the most, the largest findings are inadequate accounting policies and procedures and or systems that adequately track expenditures. Now, technically if you read the DOJ Grants Financial Guide, you do not need to separate between state and formula dollars necessarily, but you still need to keep track to know where you paid ex-expense, at what year, what period, what fund, got to at least know that. You don't have to fill in a breakdown all the way to the state and federal dollars, but sometimes there's an issue. You want to maintain a policy that describes the calculation review and approval process of the certification. The last part, the approval process, have multiple eyes looking on it.

This will also be talked about a little bit as we go along, more than one person. I just ran into this again this year. We have a lot of new staff. I went out with them, ran into the same person who does your VCC form. It's Judy. That's not the actual person, but it's Judy. She's the only one who knows how it works and she's retiring next year. So it's very important that there's multiple steps, multiple approval processes so that more eyes get on it and there's less errors. It's very important to do that. Have the certification form completed and reviewed by individuals or individual with specialized personal knowledge of the compensation program and funding. Do not give the victim compensation reform to the newest person unless that's the only person around. Make sure that you are guiding and people are sharing knowledge to new staff and or your replacements, whatever kind of planning, whatever the planning is called, for the next person in line, it's always good to do that.

Have the entity's Authorized Representative as signed in the JustGrants system or other individuals with signing authority, sign the certification. Make sure you check your JustGrants and who that person is. A common error that we find in the VCC forms is that the manager or the financial person who's filling it out, who's not the CFO or the director is signing it. If you're filling out, generally you're not the person signing it unless you're a very small agency. There are exceptions, I know that. But in general, usually many larger programs have multiple tiers and so make sure you have signing authority, that would be great. Okay, next slide.

Overcertifications and undercertifications. So a lot of people are going to ask, one of the big questions that hasn't happened yet, but I know people are going to ask. What about the new compensation regulations? Well, they have not been approved yet. Not sure when they're going to be approved. They're still in the process. I have no information to give you any insight or anything. So for right now, we're going to treat the VCC forms like we have for the past four years. Same information, same everything else. So at this time, we are not going to be doing anything related to undercertifications.

So that will have to be put off until another date or another time or another VCC form. And overcertifications, the same rules apply. Everything is completely the same. So in the event there's an overcertification in terms of if you actually over certify, let's say you say you're going to get X amount of dollars and fill out the form, and then either review by OCFO or review by OIG determines that you over certify that X amount, then you're going to have to pay that back. There's different ways to pay it back. We can do it by refunding it directly to OJP, or you can actually deduct it from future VCC forms, which we'll talk about later. And at this point, undercertifications will not be, if you're undercertified, unfortunately, we will not be paying you back for that at this time. All right, next slide.

All right, line by line walkthrough. So next thing I'm going to do is go through each section and I'm going to break down each thing, common errors that people can make, so pay attention. So the first, this is the VCC form. It's a PDF fillable form that's out there. The first one is put your state or territory's name down. So it doesn't have to be fancy. You can just put Wisconsin, Oklahoma, whatever you want to put down, that'd be great. UEI number, Unique Identifying Information. So that number is yours from SAM.gov and people ask me sometimes, where is that number? Well, if you go into JustGrants to your home page where your grant number is in funding, your UEI number will be right there. And then all you need to do is put that into that spot.

Why do we ask that, I get a lot of questions. Because we're doing this remote and then we upload this into the system externally, with that number on there, it helps us track and find that form if we need to. For example, somebody wants to run reports or do kind of things that nature, with that number on the form, it helps them, I'm not sure how the compute people do it, but they're able to find these forms in the sea of information, which is JustGrants, pull them all together.

Name of state and administrating agency, copy what is on your, what do you call it, JustGrants home page. Instead of saying department like shortening or anything, just put what's on your JustGrants home page and everything should be good. And then the reporting period, that's going to be now, as I've said before, and I'll say it again, in terms of we look back when we do the reporting periods, it's really like we're looking back almost a year ago to then formulate the VCC forms for today to then fund your allocations for it. FY23, you kind of have time to reconcile them in FY24, and then report on them in FY24., and then we report and then we pay them out in allocations in FY25.

So October 1st, 2022, September 30th, 2023. Those are the dates that you need to do. I put that in my email as well as it's on this form as well. And this presentation will be uploaded onto the OVC website. It's actually a current copy on that right now. I always upload it every year. So even after this, there's already a current one there now and then usually uploaded every year so that people, new questions, things of that nature. Okay, next slide.

All right, line A: Total amount. So this is where you're going to enter the entire total amount of expenditures incurred by the compensation program for payments due on or behalf crime victims for all funds sources for the relevant federal fiscal year, which is federal fiscal year 10/1-9/30. So this is where you're going to put all the information. You don't have to deduct anything ahead of time. I just ran into this on the news site visit where they were kind of deducting things ahead of time and then putting this number up. No, because you're kind of double penalizing yourself. So do not deduct anything. Do your payments now, everything that you pay in that reporting period, not up to this point. Make sure you pay attention to the reporting period and things that were actually paid for, unnecessary obligations or future, what you paid for, what money went out.

All right, now this can include many things. Forensic sexual assault examinations, including payments made in connection with a compensation claim or three separate payment system. Some states have a different payment systems that's not part of the compensation program. Technically, it's got to be part of the compensation program to count for reimbursements, but some states have things a little bit different. Might go through their victim assistance program. Might be kind of an offshoot, but it's got to be through your victim assistance program. So I mean, it could be a separate funding stream. Just be aware that those can be paid for. Payments made with the American Rescue Plan Act of 2021. Don't see too many of those, could still be around. If that money went into your account and you've made claims on those, going to include that money in there.

And also payments amounts recovered from restitution collection or subrogation under a civil lawsuit. So any of that money kind of comes in. Things of that nature that may have gone out, like money that came in that you then repurposed, that's all going to be put into line A. Just remember most things go into line A. Do not include expenditures from costs other than compensation payments, i.e., administrative costs. So it's very important. I'm going to bring this up a few times as we go through. Remember, if you get funded \$1 million, let's say, remember you have 5% administrative costs. Now you don't have to use it, but if you do use it, you got to make sure you account for that. That's usually one of the largest errors that people make sometimes, it's not accounting for administrative costs for payroll or maybe it's travel to the VOCA conferences or outreach.

Whatever you need, you need to account for those administrative costs, if you use them. There are some programs that choose not to, they choose to use 100% of their money for claims, that's fine too, whatever you want. But if you do use admin funds, you need to account for it. You may use 5% exactly, you may only use 3.9%, whatever it is, you need to account for it. Next slide.

B1: VOCA grant funds. So this is where you're going to list what you paid for in terms of for that reporting period, the grant, the VOCA grant that you used and the amount that you used to pay, not your grant award. So number one error is people will put their award amounts here, but that's not what it's for. You would put, say, 2021 15 OVC 21, but you're not going to put the award amount unless you used 100% of that award. You're going to say, oh, I used \$800,000 out of that \$8,124 for that reporting period. And that's where you're going to put that down. Also, you need to make sure you're accounting for administrative funds on these too. This is these common errors. So this is where you're going to deduct, as you know, your reimbursement up to 75% for state dollars.

So this is where you're going to put the federal dollars. So this is our first deduction line. So make sure you put that down, make sure you pay attention, because sometimes people will forget. They'll look at 2023, is it 2024 now? So I might look at 23, 22, forget all about 21, or what I just recently ran into is because we do no cost extensions, they forgot that they actually had money left over 20 that they asked for no cost extension and did not put it in that line. So pay attention that you know what dollars you're using and how much you've used for to pay out those costs of the federal dollars. All right, next.

Let's see, refunds. All right, this can include refunds from open award and close award. So this is where if you get refunds back everybody, the different terminology for everyone, but if you get refunds, you make a claim and for whatever reason you're paid back, this is where you're going to put it. Now, one thing we get asked questions is, three weeks ago or four weeks ago, got asked the same question, what happens if I get a refund from, in this case it was eight years ago. Some doctor went through, I guess they had his books done, realized that a claim that you paid in 2013, they didn't bill as much as they thought they were or whatever the reason. There's so many different reasons it could be. So he returns 23 dollars and 54 cents from bill paid in 2013, what do you do with it?

This is where refunds. Instead of sending the stuff directly to OJP and sending a check with accounting numbers, this is where you're going to put that amount of money and you're going to properly account for that somewhere in your accounting systems to make sure you track that. This is how it makes it a lot easier. It helps you reduce checks, helps you keep track of things. Just going to put it in the refund so it makes it a lot easier. It can be things like overpayments, erroneous payments, uncashed checks, so many different things, but do not include recoveries from restitution collections and subrogation.

Now I'm going to put in here the VOCA Fix Act. I ran into this just this year. Somebody just asked me just last week or the week before last. They're like, "Well, I'm trying to find out where to put my subrogations and restitution. You guys took away the box and I stick it in a refund." So in August of 2021, we no longer deduct those. So do not deduct subrogation restitutions. This person was new, the agency [inaudible 00:21:10] changed their policy. So when they're reading the rules I went into, when the person left and they were just were doing it themselves, they thought that they had to still do restitution and subrogation. So no, it does not go into refund. So I'll just let you know that. Pay attention we changed that in the VOCAFix Act, for new people. We want to shortcut that and read through it one time. I shortcutted the actual language in the bills, so it was kind of boring, but it's there for you. All right, next slide.

All right. Property damage or loss, line B3. So enter amounts paid to or on behalf of crime victims for property damage or losses, exclude the amount paid for damage to personal medical related devices, those can be covered, obviously. See guidelines section, I.F and the following, if authorized by state law has to be in your policies or state laws or policies or whatever. Crime scene cleanup, replacement costs for clothing and bedding held as evidence and other necessary building modifications equipment to accommodate physical disabilities resulting from a compensable crime. Now I get a lot of times people talk about, in the guidelines, there's parts about locks and windows and things of nature, and many times we'll get the question, well what about door jambs? We can replace the door and the lock, but what about the door jamb or damage to the wall or all of that? So anything that helps with the individual safety in that situation regarding the windows and the doors.

So just have the hinges, if you need new hinges, we get that a lot. We've talked about this with OGC for clarification. Basically the door jamb and all itself surrounding is considered the door. So anything you need to do to repair that and that is compensable. So I'll just let you know. We actually, if the guidelines, the federal regulations come out, that's a little more defined in them. However, right now still we're okay with that windows, if you need different things to help repair the window, seals and many different things, that is compensable.

But other things like the kitchen table might not be, or somebody's Ferrari would not be necessary, unless you wanted to pay for that, if you actually paid for that. But there are sometimes property damage or loss payments that you may pay for that are not compensable and that's where you subtract it from here. If you have any questions about that, please contact your grant manager about that. Sometimes we get questions about what really can be kind of taken out of this, and most of the time it really depends on your statute, and really statutes and policies. Next slide.

Line B4: Others. So this is where you're going to put things that need to be deducted out. So as I talked about where you would put the SLRF, I don't have the acronym in front of me in terms of the Covid Virus Recovery Act funds, that's where you would actually have to deduct them because they're not a federal fund, to an extent. There's different ones that we've talked about. Hopefully we're past that. Different funds that could be reimbursable or not. There's guidance on that, you can always ask the grant manager. But things like overcertifications, you can use this line for overcertifications. There may be things that are not compensable in your program that you may need to put in these lines that I just can't give an example for right here. So that's what this line is for. Kind of to cover things that you don't necessarily always see, and that's what it's there for, be as detailed as possible.

Another one, AEARP, depending you might want deduct that. Some cases you may not need to deduct it because it's paying for something else. That's not something that a claim that was already paid in AEARP, which is in terms of mass casualty supplemental that we give. Then you would use that to pay for to reimburse yourself or not reimburse yourself, but deduct those things from claims that are already paid. Again, ask your grant manager questions about those. Next slide.

Line C: Deductions. This is where the system actually will do this for you automatically. So you don't really need to touch all this, but you might want to double-check the math to make sure you're correct. Next slide.

Line D: State-funded payments total. Enter line A, minus line C. The form will do this automatically. This is where your state payments to on behalf of crime victims are. You're almost, we're three quarters done. This is where we get that total, where we reimburse you to. There's one more section, which is the next slide.

Recovery costs. So as you know, we do pay for costs that are related to recovery, for recovery of subjugation, all those kinds of things. You may have staff who do it, sometimes it may be collateral duty, sometimes it's not. But they have to spend 75% of their time doing recovery. So you would enter the salary benefit costs applicable to seeking recoveries, I.G. samples or percentage of time spent on recoveries X and annual salary, or individuals whose primary responsibility is directly and specifically related to recovery efforts defined as individuals who spent at least 75% of the time under covering recovery efforts. Now, that is a common thing we find in some of our work and the OIG has found is that people are putting recovery down for people who may only do 10% of their time for recovery and they're counting that. So as of right now, this year it's 75%. Recovery efforts are activities directly attributed to obtaining restitution, refunds, and other reimbursements for the expenses of specific crime victims who have recovered compensation from the state program, see the guidelines.

Please attach supporting documentation such as timesheets and job descriptions. So when we get your VCC form and you put recovery personnel costs in there, which is fine, make sure you have your timesheets and job descriptions. Sometimes there can be a time long. California's a very large state and they have the more common time log going on there, and that's okay for us. And not everybody wants to hand timesheets all the way through. Sometimes you can, some states do. So you need to basically account for their time and what their job description that details that they're at least spending 75% of their time. We don't need large general ledgers with tons of information. And they'll be like, well their time is then the general ledger. I'm like, no, we need you to break that down. We need it so that we can contain it and easily access it and review it. All right, next slide.

Total state payments and recovery costs eligible for matching VOCA grant award, line F. This is the line that we will use to determine what your allocation for the FY25 and then future allocations will be. So that number will come up. Let's say just for reference, if it's \$100 and you're going to get, and you don't have any recovery costs or anything like that, you'll be reimbursed for \$75. And so that's how the system works for now. I know it may change at some point. It's not necessarily on the regulate via updated regulations, but that's the way we do it for now.

And I think that's it. The form automatically calculates this. I always tell people double check the math. The form's never really wrong. It's done well, but sometimes people might move something and change a code number, it's locked, but somehow every once in a while, every two years we see somebody mess with something that tends to mess up. So it never hurts. Many of you have accounting backgrounds. I always count things three times. So it doesn't hurt to not trust the form 100% and just do your math to make sure it all turns out correctly. All right, next slide.

Certification. I certify to the Department of Justice, Office for Victims of Crime under penalty of perjury, on behalf of myself and the state or territory listed, that I have the authority to make the certification, which OVC will rely on as a material representation, that I have reviewed the VOCA Victim Compensation Certification Form, and that, to the best of my knowledge and belief, the data reported in this form, including the amount reported on line F, is complete and accurate. So, I know, why did I read this? It's very important that you check everything. OIG has been coming out for two victim compensation programs in 2015, and the same findings happen again and again and again in regards to not double checking, not having adequate policies.

A lot of times, a lot of people move and change from the victim compensation program and management moves and changes. You really need to, if you're a new person, take it to heart to make sure that you know how things are supposed to work and the policies and procedures. So you should have a plan that basically says there's a new person. You can read that and know exactly what funds you're pulling out of. What's this supposed to happen? Who gets deducted? Who do you talk to here, either by name or title? Make sure that's updated. It's very important. Not just saying, well give it to Bob, the Deputy Director.

The one I saw recently that says, look at the ledgers and give that information to the Division Director. I'm like, well, what ledgers? You should say code should be in there. I think Hawaii did a really good job on one. There was another one that really did good where I could read their codes. I know those change sometimes, but any new person would be happy to have those instructions. It was like three or four pages long. Other states have done the same thing. So make sure your instructions are really, it doesn't have to be three or four pages long. You might have a small program. It might only be half a page or a paragraph. But if you're a large program with many different layers, take your time and make sure your policies reflect that. I don't anticipate the OIG ever coming back out, but you never know. All right, next slide.

Certification. Common error must be the signing authority or the approved representative. So make sure to put the name, the person's title, whoever that is, and sign it. I've seen it all. I've seen the POC, Point of Contact's name, but signed by another person. Or I've seen the right name of the person signed by somebody I didn't even know, which could happen. Sometimes there's an acting person, but that was okay. But it's just make sure the right person signs it. You have the right name. It can be, I don't care if you need to print it out to have it done, even though I like it electronic, but if you want to use electronic signature, if you want to do electronic, you can scribble on it. Whatever it is, just make sure it's consistent. That's the best thing. All right, next slide.

So I've been going over this the entire presentation. I'm going to go over it again. Best practices to track expenses, retain documentation for all decisions made. It'd be an outside audit review coming in, understanding how we came up with your conclusions. Use outside people for assistance, it's very important to retain that documentation. Very few victim compensation programs and the OIG went through, went really kind of unscathed in terms of not really having appropriate accounting policies and procedures. They'll be like, well, Judy did it this way for 25 years and it worked for her. That's not good enough, so make sure you retain the policies. You keep records based on your state policy too. If it says you're going to keep them for six years, don't get rid of them in three years. Unfortunately, there are some states have 99-year rules or in one case, forever rules. So whatever it is, follow your

policy state procedures. Remember, you're a formula grantee. Your responsibility for making sure you're following your rules, because 90% of what you do is based on your rules, not even our rules.

All right, document eligibility and ineligibility. So again, common findings are like if you're going to do work law support and you approve it, OIG looks at these things and they say, you did not adequately document this, and then they say unsupported costs. So it's very important that you go through, if you are going to make, especially a decision, which is kind of on that borderline, you're kind of following your policies, but sometimes the executive director or somebody in charge needs to make a call on something. Or maybe there was a board, an appeal and a board proves you need to make sure you document that. The reason why that is, why it's an eligible claim or not an eligible claim? Why this expense is okay, why the expense is not. So it's important to do that. All right, have detailed policies, we just went over that. Out-of-date policies. If you look homework assignments, go look at your policies it says, last updated in 1992, that's a problem. Yeah, you want to take a look at that because that does happen sometimes. All right, next slide.

Resources. So each one of these links, which will be available, I'll actually put them in the chat, I think if I have time, on the slides when you upload, they'll be available, able to do the links. You have the DOJ grants financial guide, guides to completing the financial status reports for local compensation grantees, local compensation guidelines, and the online financial management training. Everybody needs to be taking that training. If you're new, to all my new people, make sure you take that training. It lasts three years, so make sure you do that. I usually put that in the application process, so less of an issue, but new people who are on the JustGrants or you don't necessarily have to do it if you're somebody who's far removed from actually filling out a lot of the information.

But there are cases where you may need to take that training. If your name appears in JustGrants as a financial contact or program manager or alternative program manager, you may need to take that training. Next slide. All right, this is questions. Now hopefully this is working here. Let me know. I don't see any questions so far. Usually you see one or two pop up as you're going along, but if you have a question you need to let me know. I am here to help.

Jeff Blystone:

I don't see any in there either, Joel.

Joel Hall:

I did the test to see that.

Jeff Blystone:

Now somebody did. Oh, okay. Yeah, it's there.

Joel Hall:

All right.

Jeff Blystone:

Joel, while we're waiting, I know you wanted to know about anybody who was new on the line. We have Haley from Nebraska, looks like Jolita from Connecticut, and Maria from Vermont, and Sarah from Indiana, are all filling out the form for the first time this year.

Joel Hall:

Welcome, Sarah. I'm glad you were able to make it. Maria and Jolita. As I said, I worked in Connecticut for a while. I saw Rachel's name on here, so welcome. We got Haley. Well, I mean, I'm not that good, somebody's going to have questions because we have new people. Again, the number one question I anticipated was that the compensation guidelines revisions, I have no information. That is beyond my ability to tell you when, if, where, how, why. But when they do go out, we'll make those changes for the VCC form next year. Many of the changes that do occur will have a retro, they retroactively look back, so it's not too big of a deal.

Well, I think this is the first time I've never had questions before in the history of the 435 webinars I've done for God only knows what. But if there's no questions, I won't keep any more of your time. I know I talk a lot and hopefully because it's like the sixth time I've done in a row that I answered your questions for you as I was going through. But we greatly appreciate everything that you're doing. As I've said before as you're a grant manager, we have wonderful grant managers with SVRD. Many of them are new, but there are many of them new. But they're learning, and if you have questions, you ask them, they'll ask me and they'll ask more seasoned people. And we will get you the answers that you need.

Again, those VCC forms are due December 31st 2024. Please turn them in. I strongly suggest that you do it earlier than rather later. One of the reasons we wait this year period is so that you can attain this information and get your records. Everything's been accounted for, reconciled, or whatever accounting language you want to use, but turn it in before you go on vacation. That's all I have to say. All right, have a great day.