BULLETIN

VOCA Victim Assistance Subaward Allocations With Multiple Funding Streams

A Reminder of the Requirements under 2 CFR Part 200

State Administering Agencies (SAAs) may choose to issue subawards composed of multiple funding streams to reduce their administrative burden or improve their ability to efficiently spend down federal funds. This approach is permissible provided both the SAA and subrecipients meet all federal requirements regarding the management of federal funds. Failure to meet these requirements can result in audit findings.[1]

I. Financial Requirements

The Uniform Guidance requires each recipient and subrecipient of federal funding to maintain an adequate financial management system that is able to record and report on the receipt, obligation, and expenditure of *each* federal award separately. The financial system should (among other things): (1) identify the amount, source, and expenditure of funds; and (2) be sufficient to allow for tracking of expenditures to establish that funds were used in accordance with federal statutes, regulations, and the terms and conditions of the federal award. See 2 C.F.R. § 200.302 and Section 2.3 of the DOJ Grants Financial Guide for more information.

When issuing subawards with multiple funding streams, SAAs should provide a breakdown of the allocated funds, and all information required under 2 C.F.R. § 200.332(b). It is particularly important that subawards identify each federal funding stream by source (*i.e.*, Federal Award Identification Number) and amount. Subrecipients should be able to identify which funding source will cover an expense before obligating funds for that expense. It is insufficient to notify a subrecipient of the funding source for an expense only upon reimbursement.

Failure to separately track expenditures for each funding stream may lead to the commingling of funds and noncompliance with audit requirements. The Single Audit Act requires subrecipients that expend federal funding above $1,000,000 to receive an annual audit. When subrecipients are unaware of how much federal funding they are awarded in each subaward, they may not be able to accurately determine whether that federal expenditure threshold has been met or accurately compile the Schedule of Federal Expenditures as required by 2 C.F.R. § 200.510.

II. Performance Measurement Considerations

Since only activities funded by Victims of Crime Act (VOCA) funding, match contributions, or program income can be reported in the OVC Performance Measurement Tool, subrecipients should track activities by each funding stream. When tracking VOCA-funded activities separately from other activities is not feasible, an appropriate prorating strategy should be applied. See OJP's Suggested Prorating Strategies for Victim Assistance Subgrantees.

[1] See OIG Management Advisory Memorandum, 25-046 (March 2025), available at https://oig.justice.gov/sites/default/files/reports/25-046.pdf (recommending that OVC issue guidance about required federal funding information to be included in subawards).

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III. Subrecipient Monitoring

SAAs issuing subawards with multiple funding streams should ensure their monitoring plans adequately assess subrecipient capacity to manage multiple funding streams and monitor subrecipient reporting and compliance with all federal statutes, regulations, and the terms and conditions of the subaward.