Guide to Completing Financial Status Reports (SF-425) for VOCA Victim Compensation Grantees
Key Terms

**Accrual Basis**: The method of recording revenues in the period in which they are earned (regardless of when cash is received) and reporting expenses in the period when the charges are incurred (regardless of when payment is made). Each recipient chooses their type of accounting basis (Accrual or Cash). Once the choice is made on the first SF-425, the type selected is locked for subsequent reports.

**Cash Basis**: The method of reporting revenues and expenses when cash is actually received or paid out. Each recipient chooses their type of accounting basis (Cash or Accrual). Once the choice is made on the first SF-425, the type selected is locked for subsequent reports.

**Certification**: Online signature by the recipient's Financial Manager when submitting an SF-425.

**Expenditure**: For financial reports prepared on a cash basis, expenditures are the sum of cash disbursements for direct charges for property and services, the amount of indirect expense charged, the value of third-party in-kind contributions applied, and the amount of cash advance payments and payments made to subrecipients. For financial reports prepared on an accrual basis, expenditures are the sum of cash disbursements for direct charges for property and services; the amount of indirect expense incurred; the value of in-kind contributions applied; and the net increase or decrease in the amounts owed by the recipient for (1) goods and other property received, (2) services performed by employees, contractors, subrecipients, and other payees, and (3) programs for which no current services or performance are required.

**Federal Financial Report (FFR)**: The new standard financial reporting form, also known as the SF-425. Financial reports are submitted quarterly to provide OJP with up-to-date information on how grant funds are being utilized. The first reporting period for which recipients are required to submit the SF-425 is October 2009 - December 2009, due January 30, 2010.

**Financial Manager**: The individual within the recipient's organization authorized to submit financial reports for assigned awards.

**Indirect Cost Rate**: Costs of an organization that are not readily assignable to a particular project, but are necessary to the operation of the organization and the performance of the project.

**Match**: The total amount of the recipient's share of the project costs. The match may be either in-kind or cash. An in-kind match includes the value of donated services. A cash match includes actual cash spent by the recipient and must have a cost relationship to the Federal award that is being matched.

**Obligation**: A legal liability to pay under a grant, subgrant, and/or contract when determinable sums for services or goods are incurred during the grant period.

**Program Income**: Gross income earned by the recipient during the funding period as a direct result of the award. Direct result is defined as a specific act or set of activities that are directly attributable to grant funds and which are directly related to the goals and objectives of the project. Determinations of direct results will be made by the awarding agency for discretionary
grants and by the State for block/formula subawards. Fines/penalties are not considered program income. Program income may be used only for allowable program expenses.

**Project Period**: The period for which implementation of a project is authorized. The project period may be equal to or longer than the budget period for an award, but can not be shorter than the budget period.

**Recipient Share**: The total amount of the recipient's share of the project costs. Also referred to as a Match.

**SF-269a**: OMB Standard Form 269A; The form previously used to submit quarterly financial reports. The SF-269a is only available for reporting periods ending before October 1, 2009.

**SF-425**: OMB Standard Form 425; The new form used to submit quarterly financial reports. The SF-425 is only available for reporting periods ending after October 1, 2009. The term SF-425 is used interchangeably with FFR.

**Unliquidated Obligation**: Debt that has been incurred for the grant, but not yet paid out. On a cash basis, obligations are incurred but not yet paid. On an accrual basis, obligations are incurred, but the expenditures have not been recorded. The final financial report should reflect a balance of zero for either accounting basis.
Purpose and Policy

In July 2019, the U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) released a review of the Office of Justice Programs’ (OJP) efforts to address challenges in administering the crime victims fund (CVF) programs. One recommendation from this review was that OJP clarify the financial reporting expectations for the CVF compensation grants in particular, especially noting any areas in which these grants may be unique from other federal or DOJ awards.

This document will first provide line-by-line guidance to victim compensation grantees in completing their quarterly federal financial reports (FFRs), which will be followed by a discussion of how victim compensation awards are unique from other federal or DOJ awards in the context of financial reporting.

Victim compensation grantees with further questions are advised to contact their Grant Manager and/or the OCFO Customer Service desk at 1-800-458-0786 (option 2) or ask.ocfo@usdoj.gov for assistance.
Completing the SF-425

The recipient information tab of the SF-425, lines 1 through 4, pictured above, consists of general award information.

- Line 1: JustGrants displays the awarding agency to which the recipients submits financial reports.
- Line 2: JustGrants displays the award number, or grant ID, assigned by the awarding office.
- Line 3: JustGrants displays the name and address of the recipient organization.
- Lines 4a and 4b: JustGrants displays the recipient’s DUNS and EIN numbers.

Select ‘continue’ to move to the report information tab.
5. Recipient Account Number
Enter the account number or any other identifying number assigned by the recipient to the award. This number is for the recipient's use only and is not required.

6. Report Type
A final report shall be submitted within 120 days after the grant period end date.

7. Basis Of Accounting
Specify whether a cash or accrual basis was used for recording transactions related to the award and for preparing this report. Accrual basis of accounting refers to the accounting method in which expenses are recorded when incurred. For cash basis accounting, expenses are recorded when they are paid.

8. Project/Grant Period
Enter the project/grant period (start and end date). This should encompass the beginning date of the original award and the latest ending date under the award number.

9. Reporting Period
Enter the start and end date of the reporting period. Federal Financial Reports will be submitted on a quarterly basis. A final FFR shall be submitted at the completion of the award agreement. The following reporting periods shall be used for quarterly reports:
- October 1 – December 31 (due by January 30)
- January 1 – March 31 (due by April 30)
- April 1 – June 30 (due by July 30)
- July 1 – September 30 (due by October 30)
Quarterly reports shall be submitted no later than 30 days after the end of each reporting period. Final reports shall be submitted no later than 120 days after the project or grant period end date.

- Line 5: Enter an internal account or identifying number, if applicable. This number is for the recipient’s use only and is not required.
- Line 6: Click the radio button to note whether or not this is the final report for the grant. If the answer is yes, additional fields will be required.
- Line 7: If the financial report is being completed for the first time, click the radio button to indicate either cash or accrual. See the Key Terms discussed earlier in this document for important definitions. After the first report for an award, the radio buttons will not be active. In order to change the basis of accounting after the first report, contact OCFO Customer Service by phone at 1-800-458-0786 (option 2) or by email at ask.ocfo@usdoj.gov.
- Line 8: JustGrants displays the project period start and end dates.
- Line 9: JustGrants displays the reporting period.

Important: Review the information displayed on lines 1 through 4 and line 8 to ensure accuracy. This data is derived from SAM.gov. If any discrepancies are noted, recipients should review and update their profiles in SAM.gov.
The Federal Cash section of the SF-425, lines 10a through 10c, pictured above, are neither required nor used by OJP and are not active.

**Federal Expenditures and Unobligated Balance:**

- **10d. Total Federal funds authorized**
  The total Federal funds authorized as of the reporting period and date.

- **10e. Federal share of expenditures**
  Enter the cumulative amount of federal fund expenditures.

- **10f. Federal Share of Unliquidated Obligations**
  Enter the cumulative amount for the federal share of unliquidated obligations. On a cash basis, unliquidated obligations are obligations incurred, but not yet paid. They include direct and indirect expenses incurred but not yet paid or charged to the award, including amounts due to subrecipients or contractors. On an accrual basis, the obligations are incurred, but the expenditures have not yet been recorded. On the final report, for either cash or accrual basis, this line should be zero (0). Do not include any amount in Line 10f that have been reported in Line 10e. Include the unliquidated obligations that will be expensed by the end of the next quarter. Do not include any amount in Line 10f for a future commitment of funds (such as a long-term contract) for which an obligation or expense will not be incurred by the end of the next quarter.

- **10g. Total Federal share (sum of lines c and f)**
  The sum of Lines 10e and 10f.

- **10h. Unobligated balance of Federal Funds (line d minus g)**
  The amount of Line 10d minus Line 10g.

The Federal Expenditures and Unobligated Balance section of the SF-425, lines 10d through 10h, is pictured above.

- Line 10d: JustGrants displays the award amount.
- Line 10e: Enter the cumulative amount of federal fund expenditures.

For reports prepared on a cash basis, expenditures include:
- Cash payments made with Federal dollars to or on behalf of victims;
- Cash used to reimburse state funds for payments made to or on behalf of victims;
- Cash disbursements for direct administrative or training costs; and
The amount of indirect expenses charged.

For reports prepared on an accrual basis, expenditures include:
- Cash payments made with Federal dollars to or on behalf of victims;
- Liabilities recorded against the Federal dollars for payments made to or on behalf of victims;
- Cash disbursements for direct administrative or training costs;
- The amount of indirect expenses incurred; and
- The net increase or decrease in the amounts owed by the recipient for (1) goods and other property received; (2) services performed by employees, contractors, subrecipients, and other payees; and (3) programs for which no current services or performance are required.

- **Line 10f:** Enter the cumulative amount of the federal share of unliquidated obligations.

On a cash basis, unliquidated obligations are incurred, but not yet paid. On an accrual basis, the obligations are incurred, but the expenditures have not yet been recorded. Those obligations include direct and indirect expenses incurred but not yet paid or charged to the award, including amounts due to subrecipients and contractors. On the final report, this line should be zero.

Do not include any amount in line 10f that has been reported in line 10e. Include the unliquidated obligations that will be expensed by the end of the next quarter. Do not include any amount on line 10f for a future commitment of funds (such as a long-term contract) for which an obligation or expense will not be incurred by the end of the next quarter.

- **Line 10g:** JustGrants calculates this field by adding lines 10e and 10f.
- **Line 10h:** JustGrants calculates this field by subtracting line 10g from line 10d.
The Recipient Share section of the SF-425, lines 10i through 10k, is pictured above.

- Line 10i: Enter total match requirements by the recipient for the award. VOCA Victim Compensation awards do not have a match requirement, so zero should be entered. State payments used to determine future awards are not collected in the FFR, but are rather identified during completion of the annual victim compensation certification (VCC) form.
- Line 10j: Enter the recipient match provided for this period. VOCA Victim Compensation awards do not have a match requirement, so zero should be entered.
- Line 10k: JustGrants calculates this field by subtracting line 10j from line 10i.

The Program Income section of the SF-425, lines 10l through 10o, is pictured above.

- Line 10l: Enter the cumulative amount of federal program income earned. Recoveries, refunds, restitution, and subrogation are not program income for the purposes of the FFR.
• Line 10m: Enter the cumulative amount of program income that was expended in accordance with the deduction alternative. Recoveries, restitution, and subrogation are not program income for the purposes of the FFR.
• Line 10n: Enter the cumulative amount of program income that was expended in accordance with the addition alternative. Recoveries, restitution, and subrogation are not program income for the purposes of the FFR.
  o If this is a final report, this field is required. A zero may be entered.
• Line 10o: JustGrants calculates this field by subtracting lines 10m and 10n from line 10l.

Note: If the report to be submitted is the final SF-425, the Program Income section (lines 10l through 10o) must be completed. Based on the nature of the program, OJP anticipates the majority of VOCA Victim Compensation recipients will not report program income. Grantees who believe they have program income to report are encouraged to speak with their grant manager.

The Indirect Expense section of the SF-425, lines 11a through 11g, pictured above, is used to report indirect expenses. Recipients should use their approved indirect cost rate agreement or the de minimis rate, if applicable, to complete this section. If no indirect cost rate is being charged to the grant, select ‘Not Applicable’ from the dropdown menu for column 11a.

• Line 11a: Select the applicable indirect expense rate from the dropdown menu. Note: If ‘Not Applicable’ is selected, proceed to line 12.
• Line 11b: Enter the indirect cost rate in effect during the reporting period.
• Line 11c: Enter the beginning and ending effective dates for the rate.
• Line 11d: Enter the amount of the base against which the rate was applied during the reporting period.
• Line 11e: JustGrants calculates this field by multiplying lines 11b and 11d. The total is the amount of indirect costs charged during the time period specified.
• Line 11f: Enter the dollar amount of the federal share. For each indirect expense rate, the federal share cannot exceed the amount charged.
• Line 11g: JustGrants calculates the total of the amount charged column and the federal share column.
Select ‘continue’ to move to the Remarks & Certification tab.

The Additional Information section of the SF-425, line 12, pictured above, is used to provide optional additional remarks and supporting documentation.

- Line 12: Enter remarks, and upload documentation deemed necessary to further explain the financial information provided in the report. Recipients may also attach supporting documentation in the Attachments section. This field is generally optional for VOCA Victim Compensation grantee, unless the figures in lines 10e or 10j are less than the previous reporting period. If so, the grantee must add narrative remarks explaining the discrepancy.

The Certifications section of the SF-425, line 13, pictured above, is where the Financial Manager certifies the accuracy of the data entered on the form.

- Line 13: Review the certification information and select the ‘submit’ button.
Discussion of how VOCA Victim Compensation Awards Differ From Other Federal and DOJ Awards in the Context of Financial Reporting

Four primary documents discuss the financial management specifics of VOCA Victim Compensation grant awards:

1. VOCA Statute, at 34 U.S.C. § 20102;
2. VOCA Victim Compensation Final Program Guidelines;
3. DOJ Grants Financial Guide; and

The statute requires OVC to make an annual grant to eligible crime victim compensation programs of 75-percent of the amounts awarded during the preceding fiscal year, other than amounts awarded for property damage. Other than 5-percent of the award amount, which may be used for administrative and training purposes, grant funds may only be used for awards of compensation.

As discussed in the Final Program Guidelines, the primary purpose of VOCA Victim Compensation grants is to supplement state efforts to provide financial assistance and reimbursement to crime victims throughout the nation for costs associated with crime, and to encourage victim cooperation and participation in the criminal justice system. As a condition of receiving grant funds, states must certify that awards will not be used to supplant state funds otherwise available to provide crime victim compensation benefits or to administer the state crime victim compensation program. However, OVC specifically notes that the expenditure of VOCA funds received based on state certified payouts from previous years does not constitute supplantation.

The DOJ Grants Financial Guide explicitly states that, for the VOCA Victim Compensation Program, there is no financial requirement to identify the source of individual payments to crime victims as either federal or state dollars, nor is there any requirement that restitution recoveries or other refunds be tracked to federal or state dollars paid out to victims. However, the state agency administering funds under this program must have in place an adequate accounting system to capture and track all financial transactions related to the victim compensation grant; and upon request, must provide authorized representatives with access to and the right to examine all records, books, paper or documents related to the victim compensation grant.

Because there is no requirement that states identify individual payments as being made from either federal or state dollars, states are permitted to make compensation payments from a state account and then reimburse that account with federal grant funds. When taking this direction, states should take care to report expenditures on the SF-425 in accordance with their cash or accrual basis election and the guidance provided earlier in this document.