

[Transcript from the OVC Grantee Webinar Series titled, Putting the Pieces Together, Understanding Your Award Special Conditions, which was held April 30, 2019. The archived webinar can be found at: <https://www.ovc.gov/training/index.html#granteewebinar> ]

MARY JO GIOVACCHINI: Good afternoon, everybody, and welcome to today's webinar, OVC Grantee Webinar Series, Putting The Pieces Together, Understanding Your Award Special Conditions, hosted by the Office for Victims of Crime.

At this time, I would like to introduce your presenters today, Joel Hall, Bethany Case, Brian Sass-Hurst, Sharron Fletcher, and Kris Brambila from the Office for Victims of Crime.

A quick overview and outline of today's presentation, we are going to discuss and provide you with an overview of what the Office for Victims of Crime is, give you an understanding of what your award special conditions are, and we're going to close it out with some tips and resources that you can use to help you as you manage your grant. Our goal today is to provide you with knowledge and resources on a variety of special conditions that must be met in order for you to successfully manage your new Office for Victims of Crime grant award. At this time, I'm going to turn it over to our first presenter.

JOEL HALL: Good afternoon. My name is Joel Hall with OVC and I'm a program specialist who works for the State Formula Compensation Assistance Grants. Before I start, I want you to understand that those who are in attendance today represent many different grant programs throughout our office. We have a very diverse group with many different grant programs from all over the world. This webinar is to act as a reference highlighting areas that apply to most—all OVC grantees and their special conditions. If you hear something today that you are not familiar with, that might be because it might not apply to your grant. If you're unsure, please contact your grant manager to clarify any confusion.

OVC is committed to enhancing the nation's capacity to assist crime victims and—for victims—and providing leadership in changing policies and practices to promote justice and healing for all the victims.

What you're seeing now is OV—There's three different slides and the type of OVC awards. OVC supports many types of programs throughout our three divisions. There are way too many programs to go over the list. I just want to talk about two of the major ones which are Crime Victim Compensation and Formal Assistance Grants, for most—95 percent of the bulk of the grants that we provide. But many of you who are on this slide are part of a discretionary grant program or tribal set-aside. We do a whole host of different kind of grants, human trafficking, victim legal assistance, fellowships, national scopes training; many of you may actually be part of that bulk, which only represents five percent of our grant funding.

You will see here, of all the many different grants that we have. Tribal actually now makes up one of our largest groups right here at 205, followed by formula, children and youth at

48, and human trafficking at 71. This has been a substantial change for the past 5 years, but we're looking forward to serving all in the very varied varieties of you.

So, I have some polling questions. What is—basically on the right side, you'll see a list of questions, and you have A through F. So, what I want you to do is take a look and let us know which grant topic or type is your grant. So you have human trafficking, tribal set-aside, CTAS, Victim Assistance/Compensation formula, National-Scope Training, Demonstration and Service projects, or if you're not sure, you can also check that. Now, it's going to take a little while for us to process these results. Please enter them in now and I will give you the results in a few minutes when we do tally these things. But why don't you go ahead right now and start typing in the information and we'll give you about 30 seconds.

Before we start, there are things you need to know. The special conditions and language mentioned during the webinar are specific to FY 2018 grants only. If you have grant-specific questions regarding special conditions, please contact your OVC grant management specialist.

What you see up here are three of the topic areas that we'll discuss. We have General Special Conditions, Programmatic Special Conditions, and Withholdings. So our first topic, which we're about to go into, is the General Special Conditions. Special conditions are terms and conditions that are outlined in your grant award. What you're looking at is a sample of your grant's award. Many of you—when you get your award package, your executive or signing authority will sign on the bottom, but you need to pay attention to a lot of the language that's in the first pages of your award. This is part of the reason why we're having this grant [webinar], is to basically look and review many of those special conditions. We received some questions earlier. People saying they didn't have special conditions. Every grant has special conditions on some way or another. This is just a term that we help—for you to enforce federal compliance with many of the different laws and regulations that we have.

Where can I find my special conditions? As I said before, in the award package.

Who should read the special—who should read your special conditions? Basically everybody who's working on the grant. Most specifically, obviously, your signing authority and the point of contact and financial point of contact, but anybody who's really working with the grant because there are a whole different host of special conditions that can relate to subrecipients as well as daily activities that those working on the grant may encounter. It's not just all federal regulations. It can deal with things such as encourage—or discouraging texting while driving, lobbying, and things of that nature. So it can apply to all of your staff who are paid out of this grant.

All right. So we have our poll results. It looks like we've got—the most people who are in attendance are actually victims assistance and compensation people, followed by tribal, and then human trafficking. So welcome very much. We're very appreciative.

All right. Special conditions, active versus removable. So what does—Active special conditions remain active throughout your project period. So, these are things that are active that don't get removed until the end or the closing of the grant. Removable special conditions can be removed during the grant. We're going to speak to several of those when we get into Programmatic, which are also removable. Not all special conditions can be removed. Many are active, many have to do with, say, as what I used before, texting—not encouraging texting while driving. That is something that will remain active in—during the life of the grant. However, something such as a privacy certificate, which we will speak more about later, is something that can be removed.

Read your document. Check in GMS. And talk to your OVC grant manager. At grant closeout, you must certify that all conditions have been met with the removable special conditions.

Now, I'd like to turn it over to two of my favorite people, Bethany Case and Kris Brambila.

BETHANY CASE: Hello, everyone. I'm Bethany Case and you'll be hearing from me for the next few minutes. Good afternoon or good morning to you, depending on where you're located today. I'll be kicking our special conditions discussion—kicking off our special conditions discussion today by talking about your General Special Conditions. So you see here, General is highlighted in blue and that's what we'll be talking about for a little while. Next slide.

There are 27 general conditions applied to each and every fiscal year 2018 award. Sometimes these change year to year. This year, you all—Today, we are going to be discussing about all of the conditions that were applied to fiscal year 2018 awards. And so, you might wonder, “how do I know if this is me?” Because your award number says—starts with the numbers 2018. So I'm going to give you some easy tips on ways to figure out this—sometimes things that we refer to in complicated ways.

So, all of these General Special Conditions are listed in your award document. This is the document Joel mentioned. It's something that your organization received in writing when you received notification that you've got—you were selected for this grant award. And someone in your organization, your authorized official, initialed on every single page saying that they had read them, and that they were agreeing that your organization would comply with them. So, surprise. Someone has also already committed you to following all of these. So, today we'll be talking through these general conditions.

A resource that I'd like to highlight, you can see at the bottom of slide, is recently our attorneys here in the Office of Justice Programs developed a really awesome online resource where you can read up some more on what these special conditions mean and they have hyperlinks to different kinds of resources. So, I just want to emphasize this link at the bottom of this slide is going to be a very important resource for you in helping to understand and apply successfully your special conditions.

[\[https://ojp.gov/funding/Explore/LegalOverview/MandatoryTermsConditions.htm\]](https://ojp.gov/funding/Explore/LegalOverview/MandatoryTermsConditions.htm) And I want to let everyone know that if you're lucky, and we happen to know that each and every

one of you are actually lucky, you will have more than just these 27 general conditions. Every grantee does. So, today we're going to start with these 27 that every single grantee shares.

So, next slide. We're lucky in that we're going to be able to go in order, a little bit in the beginning, because these are conditions applied to every single grant award. So, bonus points to you if you have your award document in front of you and you're following along and taking notes.

So, we'll start with condition number one that everyone has. Generally, most grantees, it's been my experience, are well-intended and don't intentionally violate this special condition. Instead really what's more common and what we see is that grantees aren't reading, and perhaps don't understand what these conditions say. And—which also means that likely they are not integrating these requirements into their daily practice. So, I say that because in sum this special condition is saying, read everything carefully, ask questions, tell the truth, follow the rules, and there are some very serious penalties associated with not following the rules. And that's intentionally or unintentionally. So, we want to—our roles as grant managers are to support you in successfully meeting these obligations that you're taking on with this grant award. So, that's my translation of this particular special condition.

So moving onto your second special condition, we'll do that in just a moment. Here we go. So, the current regulation that guides the requirements associated with your grant award are the Uniform Administrative Requirements. You can see a nice little picture, an image, it looks like such an interesting federal document. But it's very important to all of us. And we all need to be aware of it and be readily applying what's in here. So shorthand, these requirements are referred to as Uniform Guidance or Uniform Requirements. So, you'll hear folks refer to them using, kind of, a handful of different terms, but that's what this is. And so, just a little bit of history on those. These apply to everyone from—that received grant awards from fiscal year 2014 forward. Prior to the existence of these Uniform Requirements there were lots and lots of government regulations. And folks were kind of piecemealing things together, and the government heard loud and clear that this is very confusing for government agencies but also for all of the grantees. And so, they wanted to provide uniformity across government. And so, they worked really hard to consolidate all the regulations into one, and that is what we have now. We have this main government wide rule, and this is—this is the Uniform Guidance. So, here are some more of—another link to some information about the Uniform Guidance, but just knowing that this is going to be the foundation of everything that we talked about moving forward.

[\[https://ojp.gov/funding/Part200UniformRequirements.htm\]](https://ojp.gov/funding/Part200UniformRequirements.htm)

So, moving onto our third special condition. So that you don't have to wade through the entire Uniform Administrative Requirements, DOJ did you a favor. You might not see it as that, but they did you a favor, similar to many other federal agencies, and they pulled out what relates specifically to DOJ grants, and they compiled that into what you see here, which is the DOJ Grants Financial Guide. So, this was updated fairly recently and it continues to be updated. So this will be your source of kind of—this should be your first

stop when you have any type of grants financial or administrative-related questions. You should go to the Grants Financial Guide. [<https://ojp.gov/financialguide/DOJ/index.htm>] If you are one of my grantees, which some of you are, sometimes I—you ask me a question and I say to you, "Well, what does it say in the DOJ Financial Guide?" Because I am—I'm really working with you to make sure that you're using this as the resource that it was intended to be. This is public—a publicly facing document, everyone has access to it, and it's something we all need to be actively using. Now, with that being said, it is a 164 pages long, so it's shorter than the Uniform Administrative Requirements document, however it's lengthy. So, I'm going to clue you in on a little tip, something that I do. I use the PDF version, I open up the PDF version of this document on my computer, and I do a little right click and use that find function. I type in a keyword, something that will narrow down the topic of what I'm looking for, and searches throughout that document and just brings me directly to those places. So, please don't be too overwhelmed. Yes, it's lengthy, but it is manageable. If I do it, you all can do it. So move onto our next slide.

So, we're going to be jumping around now in order, but you got four in a row that you can check off of your award document. So, this is Special Condition number five in case you are looking at your award document. I'm going to say this probably so often during the call, but everything we say please pay attention and look at the special conditions some more. I want to highlight this particular issue because you can get your grant funds withheld. So you got to do a draw down and there's a hold on your funds if you don't comply with this. So, these are one of those, "Hey, red flag, red flag."

So, if you are listed in the Grants Management System, GMS, as either the point of contact or the financial point of contact, and oftentimes we see multiple financial points of contact, so this applies to all of the people you have listed in GMS, you are now required to take DOJ's Grant Financial Management Training. The good news is you can do this either in person or online, and the link to the information about this training is provided here. [<https://onlinegfmt.training.ojp.gov/login/index.php>] So, I think it recently changed, maybe not. But another tip, another Bethany's tip is, you know, whatever internet search engine that you use, sometimes I like Google, but you know, I just type in there, "DOJ Online Grants Financial Training," and it'll bring you right to—right to where you need to be. So, just reflecting back kind of who is it that needs to take these, both program and financial contacts listed in GMS. So, if you are on the phone today, please log in to GMS and see who are those people listed. It might be you, it might not be you, but everyone needs to know who are—who those folks are listed in GMS. This may come as a surprise to some of you, but you have to do this within 20 days after the date that you have accepted your grant award. And then, if anyone ever changes, so many of you will do change of contact Grant Adjustment Notices in GMS, that new point of contact also has to take this training within 120 days. How often? This expires every 3 years. So, know that you're good for 3 years after you've taken it. And we strongly encourage you to send your training certificate to your grant manager. We have some technology that is sometimes operational that is intended to track the certificates, but we can't consistently rely on that. So, just to be sure that you have your team taken care of, send your training certificate to your grant manager. And I mentioned before, the penalty is pretty serious. So it can be

holding the funds until you—the folks that are required to complete this training, complete it.

I know you all are furiously taking notes on your award documents in your offices all around—all around the country. Or you're patting yourself on the back because you already knew these. If you haven't taken that Grants Financial Management Training yet, know that you should do that, now. So, here we are on our next slide.

This is Special Condition number seven if you happen to be looking at your award document. This really focuses on not duplicating efforts or double dipping. So, if you have a grant award, say, through OVC or, say, through another funding source and you apply for and—maybe you apply for two grants at the same time to do the same thing, and you get them both. Well, congratulations, but pause. Let your grant managers know, "Hey, great news. I got, you know, two grants to do the same thing," and then you need to be working with those funding agencies to determine how you will—what you will do under each particular grant. Because no, you cannot get paid double to do the same amount of work. So, again, I think that should probably make sense to everyone. If you have any questions, reach out to your grant manager. But know that this condition will be active throughout your grant award because you might apply for other federal grant awards or some surprise—something might happen and you're given some type of award. If you come into the situation where you may duplicate, stop. Know that you don't need—you know, figure out a way that you're on the up and up.

So, we're going to be talking about Special Condition number 12, I believe, for most of you. And this is a newer special condition in the past couple of years. And this basically says that if you are a grantee or—and—or working on a project funded through a federal grant in any capacity, as an employee, as a subrecipient, as an individual, anything at all, you are strictly prohibited from engaging in any activities that may be considered human trafficking. And before our webinar began, I actually went to this link to look into what—how that's defined. [<https://ojp.gov/funding/Explore/ProhibitedConduct-Trafficking.htm>] And there's a lot of great information on there about what is—how human trafficking is defined and saying that if you receive a federal grant, you cannot participate in any of those activities, or anyone associated with your grant or your project and that if it is discovered that you all have, that your grant award will be terminated. And I'm sure that additional penalties would come into play.

We're going to be talking a little bit about measuring your performance—or performance measurement and progress reporting. Hopefully you're looking at your own award document and you have figured out which number Special Condition this is for you. So, a lot of these special conditions, many of them we're going to—we're going to reference various federal regulations that apply to your grant that are attached that you must follow, and also different laws. And so, here, the government's perform—the Government Performance and Results Act, and then the GPRA Modernization Act of 2010 requires federal agencies to determine performance measures to be able to—and then provide those to grantees who then have to report on those at pre-determined, kind of, intervals of time. Just know that this is a requirement of the law. There is more legislation coming in

this area, so don't think that it will be going away. Know that we're just getting—trying to become more efficient and effective at our performance measurements. So, depending on what type of grant you have, you may be reporting on your performance—the things that you're doing through the grant, through the Performance Measurement Tool or PMT. If you're a human trafficking grantee, you might be reporting in TIMS, the Trafficking Information Management System. Other grant programs may have a template that they're using, and we are all sort of moving in the right—moving in a direction where in the future we will all be reporting using the same methods, so we can then report out about how all of our funding is being used.

So, what you're going to do is you're generally—you're going to be reporting your information into these various systems on perhaps a quarterly report is most common around OVC. And then, you are going to still have to go back into GMS for your semiannual progress reports. And you will be uploading those reports from your other system into the Grants Management System. And so, those semiannual progress reports are due in January and July of each year. Oh, or December for our formula grantees. Our Formula...

JOEL HALL: Formula is once per year.

BETHANY CASE: So, formula grantees—Joel works on that division that oversees the formula grantees and so he says that they report once a year.

JOEL HALL: In the GMS, so...

BETHANY CASE: In the Grants Management System. And know that when you—if you don't submit your report, your funds are automatically frozen. Your grant manager can't help you with that at all. It's an automatic thing that happens in the Grants Management System.

JOEL HALL: And the only way to have it removed automatically is to submit your progress report in GMS.

BETHANY CASE: Yes. So, just do it. We're trying to get better at it so that it's more intuitive. But it is a requirement. So, now I'm going to turn it over to my colleague Kris Brambila to talk about some additional special conditions.

KRIS BRAMBILA: All right. I'm Kristopher Brambila. I'm an attorney in the Office of the General Counsel for OJP and I advise OVC in their implementation of all their various programs.

I'm going to speak to six conditions here. The first is the requirement to register with the System for Award Management. But all the conditions I'm going to speak to essentially have the purpose of helping mitigate the risk of misuse of grant funds. And they do this in a couple of ways and I mean—Most of them are—essentially provide notice to you of things that you cannot do or things that you agree that OJP can do to address either



noncompliance or some risk that we identify in your implementation of these projects. Some of the conditions have, you know, have affirmative requirements that you need to take, affirmative actions that you need to take in terms of doing something. And so I'm going to highlight those as well.

But, the first one here, the System for Award Management, the requirement essentially to this condition is that you register with the System for Award Management. And the System for Award Management is a federal clearinghouse for information about entities that receive federal money. So, for example, OJP checks the System for Award Management, which we call SAM, to see whether another agency has suspended or debarred an organization that we are contemplating awarding a grant to. So, for example, if an organization is suspended or debarred, it's prohibited, you know, from re—can be prohibit—prohibited from receiving federal funds. We would check SAM to see, you know, for that information. So, this condition has a couple requirements. The first is that you register with SAM and stay registered for the duration of your award. If you're a grantee—if you're a grantee already, you have an FY '18 award from OVC, you've already registered most likely during the application process so you don't have worry about that at this point. But you do have to keep your registration updated. And there is a requirement that you renew it annually. Another part of this is you also have to make sure that your subrecipients register. So this condition essentially passes through. You have to make sure that your subrecipients register with the System for Award Management. And correlated with this, I talked about, you know, these conditions help mitigate risk. One of the things that you're required to do as a—as a recipient to federal funds, if you are making pass-through awards or if you are making subawards, you are required by Part 200, which Bethany talked about earlier, and 2 C.F.R. 200.331 essentially requires you to check the System for Award Management before making a subaward to make sure that the organization or the entity that you are going to award subaward funds to isn't prohibited from receiving federal funds. So, it's fair—a fairly straightforward condition. You need to register with SAM, update it, make sure your subrecipients register, and then check SAM when you need to check it.

So I'll go onto the next slide, which, again, has to do with risk. This one specifically is, “the what happens if you failed to address issues identified during an audit?” And I'll wait for that slide to move onto the next one. So, the variety of audits that your programs may be subjected to. The most familiar I think at least for OVC purposes is the OIG, so our Office of Inspector General. The DOJ has an office that is—that is tasked with essentially going in and making sure that there is—trying to find fraud, waste, and abuse in government programs and making recommendations to mitigate the risk of fraud, waste, and abuse. And the OIG goes in and they can audit pretty much any program they choose to and they audit a fair number of OVC programs.

You know, and their findings in their audits reports, they'll essentially enumerate a variety of—if there are findings, they could range from, you know, “Hey, you need to strengthen your Grants Financial Management Systems,” to—all the way to, you know, “Hey, you—this organization misused federal funds and needs to return these federal funds.” They can run the spectrum. But the OIG and the reports that enumerates, you know, the audit



recommendation. So they'll actually say, "Our first recommendation is this. Our second recommendation is this." Those audit issues can also come up in your single audit. So if you're an organization that's required by Part 200 to perform, you know, to have an annual audit performed on your programs, those reports go into a database, and OJP checks the database as well. So, audit issues can be identified there as well.

If there are audits, recommendations, or issues that are discovered in audits of your programs and you haven't addressed those, what this condition lets OJP do is essentially take a number of actions to make sure that you address those audit findings. And the purpose behind this is to make sure that where there's risk identified in your—in your program, that we address that before you move forward with the project. So, the typical remedy would be withholding of funds. And Bethany spoke to this earlier. I mean, if you—if there is an issue, an audit issue that puts federal funds at risk, the type—typical remedy, you know, that OJP takes in a lot of cases is to withhold your ability to draw down additional funds until that issue is addressed. There are a number of other remedies short of that. Sometimes, we—grantees go on a reimbursable basis where you're still incurring costs but you're not allowed to draw down until we verify that those costs are allowable. And there are a number of remedies we can take. But this special condition puts you on notice and your organization has agreed to it that the Department of Justice can take action if you—if you fail to properly and promptly address outstanding issues from audits. This condition itself is just a notice. Essentially, there's no actions required as a result of this condition itself, but puts you on notice of what DOJ can do.

With that, I'll go onto the next condition which, again, addresses risk. This is what happens when you're designated as a high-risk grantee. DOJ has a process whereby, you know, OJP evaluates applications as they come in and evaluates organizations that apply for grants to assess the risk of awarding funds—federal funds to the organization. In addition, you know, risk can be identified through an audit, either before or after you receive an award. And OJP has a process whereby if certain, say, deficiencies in your financial management or past performance history, you know, or audit issues come up, DOJ can designate your organization as high-risk. And there's a high-risk list that we maintain. What that means, as a practical matter, is DOJ may impose additional requirements. Typically these requirements are geared to make sure you come into compliance. So, for example if you have deficiencies in your financial management, we may require that you take some kind of Financial Management Training. You know, they can also be withholding conditions if there's risk of misuse of funds. This condition, similar to the one, puts you on notice that DOJ can take certain actions if you are designated as high-risk. If you are—just so you know, if you are currently on the high-risk list, if you were on the high-risk list before you received your award, you likely have high-risk conditions already on your award. If you don't have high-risk conditions, you know, I guess you don't necessarily have to worry about this at this point. But if you later become high-risk for some reason, for example, I think the most typical reason is there's an audit finding that identifies some issue that happens after you're already awarded funds by OVC, this condition allows us to impose other requirements upon you to make sure that your—that the risk identified is mitigated in a satisfactory way.

This is kind of the exception to the slides that I'm going to talk about. It's a little bit different in nature. It deals with Civil Rights compliance and nondiscrimination requirements that apply to OJP grants. The slide itself is a little bit underinclusive, I think, and we may make some additions to it. It addresses—there's essentially three conditions on your—in the general conditions that apply OJP-wide. There's three special conditions that we apply that pertain specifically to DOJ regulations addressing various Civil Rights and Nondiscrimination Requirements. Those three regulations are found at 28 Code of Federal Regulations [C.F.R.] Part 42, 28 C.F.R. Part 54, and 28 C.F.R. Part 38.

They—you know, those conditions each—you know, these special conditions that are on your award essentially provide notice to you and by accepting them you've accepted that you are subject to these three DOJ regulations. You should know in addition to these regulations, there are also certain statutory provisions. Specifically, there's a provision in the Victims of Crime Act. There's also provisions in other DOJ—applicable—laws applicable to DOJ that—that on their own prohibit discrimination. These three regulations implement for DOJ, several of those statutory requirements.

So, the first one—I'm not going to go through them all. They're actually fairly lengthy and they have enough—a fair amount of detail in all them, but I'm going to highlight kind of what you may want to pay attention to in these three regulations. So, 28 C.F.R. Part 42 pertains to Civil Rights and Nondiscrimination, again. It's a lengthy rule, addresses various statutory nondiscrimination provisions. And, you know, you're going to find prohibitions on discrimination on the basis of race, color, national origin, sex, religion, age, and disability. And there are separate—there are several subsections of that—of that rule that address requirements around each of those statutory bases. The thing I think I would point out to you here, if you're a state or local government—in particular, a state and local government involved in—that is a, say, a police department or involved in criminal justice, there is a requirement to have an equal employment opportunity program. And that's one thing that's highlighted in the condition. You know, that's—again, if you're a state and local government, you might want to pay attention to Part 42 to make sure that you're compliant with that. This regulation has been around for many, many years, so it's likely that your, you know, your state or local government is already compliant with that, but that is something you're required to comply with.

Part 54, so, the rule that DOJ has issued at 28 C.F.R. Part 54, which is the second condition there, that pertains to prohibiting sex discrimination in education programs. And so, if you are, you know, a university or educational institution, you might want to look at that. It essentially implements Title IX of the Educational Amendments Act of 1972 which, again, prohibits the sex discrimination in education programs. And this—the purpose of the condition is to put you on notice and to get your agreement that you agree to comply with those requirements.

The third one, which I think is perhaps a little more directly—directly applicable but it's a little more pertinent for a lot of OVC-funded organizations is the rule at 28 C.F.R. Part 38. The rule of 28 C.F.R. Part 38 pertains to faith-based organizations. So, if you—if your organization is a faith-based organization or is a pass-through entity that makes awards to

faith-based organizations, this is something you want to pay attention to. I won't go into the details of it, but some of the highlights. You know, this rule essentially applies to faith-based organizations that are—that are offering social service programs. And that would be the majority of OVC grantees in terms of social service programs. So, if you're a faith-based OVC grantee, then you will want to look at Part 38. You're likely somewhat familiar with it already, hopefully. But take a look at it. It is a fairly recent rule. A couple things it does, it prohibits discrimination against religious organizations and based on religion. It requires that if you are, you know, undertaking an OVC-funded project that, you know, the religious activity of your organization be separate in time and place from the federal programmatic activity. There's certain employment discrimination exceptions. There's a notice requirement which is—I think was fairly recent a few years ago that requires written notice to program beneficiaries and perspective beneficiaries regarding their rights. There's also a referral requirement, you know. So, if folks, ask for referrals, there are certain requirements around that. And also, of particular importance to the state administering agencies [SAA]—for VOCA state administering agencies—that's referred to as intermediaries under this rule, but state administering agencies essentially have to have a method of administration—method of administering this rule in terms of administering nondiscrimination on the basis of religion in those programs where the states pass through funding to subrecipient organizations. So, it's something to look at if you're a faith-based organization or an SAA in particular to pay attention to that.

And last thing I would note with regards to these nondiscrimination conditions, they're mostly in the nature of noticing, "Hey, you are—you're subject to these." But there all—there's also a letter in your award package from the Office for Civil Rights—from the DOJ Office for Civil Rights. They actually enforce these Civil Rights provisions for—in the context of grants for DOJ. And they are a good source of information. They have a website that has more detailed information on each of these and they have attorneys that work on these matters. So, they are a good resource for that as well.

So, with that, I'll turn to the next condition. This next condition, again, going back to the theme we're on before about essentially mitigating the risk of misuse of federal fund, this is an interesting one. It—this condition has to do with—it's a provision essentially in restricting the reporting of fraud, waste, and abuse to the federal government. So, you know, the DOJ has an inspector general, like I said, which is—does audits but also has a law enforcement function. There—there's a requirement that fraud, waste, and abuse be reported to the Department—Department's OIG. So, if there's—if you detect fraud, waste, and abuse in your programs, you should report it to the Department of Justice Inspector General's Office. This condition deals with—essentially prohibits your organization from having an internal confidentiality agreement. It prohibits your employees or contractors from reporting fraud, waste, and abuse to federal investigators or law enforcement. And it has a couple parts. The first—you know, you've already agreed to this again. The first, you've agreed upon accepting this award, your organization has agreed that, hey—your organization does not, at the time of the award acceptance, have or require these internal confidentiality agreements that restrict the reporting of fraud, waste, and abuse to the DOJ OIG or federal law enforcement or investigators. So, you're saying we don't do this right now. We don't know of any—we don't have any such agreements.

The second part of this says, "Hey, if you discover that you do have one or more of these agreements, you need to stop obligating your federal funds under this program and let OJP know." And what this does, this protects both the federal interest and the money and I think your interest as well because if you're obligating funds while—you know, while you are not in compliance with this condition, you know, you're putting those funds at risk of being questioned or, you know, requiring to repay that money. By stopping—if you, you know, if you certified when you accepted the award that you're in compliance with this but then you later discover, "Hey, oh, were not in compliance," it's in your best interest to stop what you're doing under the award, contact OJP as soon as possible to let us know and we can work with you to get you back on track. Another thing—the last thing to note about this condition, it does pass through to your subrecipients and contractors. So, you're required to—you make an appropriate inquiry or a factual basis to believe that your subrecipients and contractors are in compliance with this, typically, that's in the nature of—you know, essentially what we're doing here is getting a statement of compliance from you. You would do the same thing with your subrecipients and contractors and have them certify that they're in compliance and that if they learn of not—if they—that they're not in compliance that they will also stop their project and you all will let OJP know. So that—you know, that's the condition on internal confidentiality agreements. I think it's fairly straightforward. You can't prevent folks from telling the Department of Justice, OIG, or other federal investigative law enforcement organizations about fraud, waste, and abuse.

The next slide we're going to talk about, is again, in the nature of risk—and it has—of mitigating risk and it has—has to do with—when you're designated high-risk by another agency. So we've already talked about happens if you're designated high-risk by DOJ. This condition discusses and then addresses what you're required to do if you're designated high-risk by another agency, another federal agency. It's pretty straightforward. If you are designated as high-risk by another federal agency, you need to tell OJP. There's an email for that. You need to copy your grant manager. There's a few—five items that we'd like you to tell us. But essentially what it lets us do, you know, if you're designated high-risk by another agency, we want to know because we might need to take certain actions to mitigate the risk of you misusing funds. So, for example, if another federal agency says, you know, your financial management says, you know, we've done an audit, those financial management—your financial management systems, you know, are inadequate in some way and it puts federal funds at risk, we'd like to know that so that we can take appropriate action. So, let us know if you've been designated as high-risk by another federal agency. With that, I believe I am turning it back over to Bethany to talk about—to talk about conferences.

BETHANY CASE: Hello again, everyone. Hopefully you are not too scared by now. We still have an hour left of digging through special conditions. I'm going to talk a little bit, real quickly, about a condition that is—it only applies to some of you. So, if you have a cooperative agreement, which is a form of a grant, it's a type of a grant, and you'll know that because it lists that in your award document and you will have seen that in your solicitation when you applied. Typically new projects or training and technical assistance projects, those types of projects are usually cooperative agreements. So, this only applies

to you if you have a cooperative agreement. If you have a grant, you're in luck; this does not apply to you.

You have to request an advance approval to use grant funds to hold a conference, and a conference is a term that is defined, broadly, to include meetings, retreats, seminars, symposia events, and even group training activities. So, even though you submitted in your application and your budget plans to do this, you still have to additionally request approval, which is only for cooperative agreement, only if you have a cooperative agreement. My advice to you is if you have a cooperative agreement and you plan to hold something that might be considered a conference or a meeting, read up on—in the DOJ Financial Guide. It starts on page 77, on section 3.10, the content, and it goes on for many pages. So what I'm saying to you is—it's a little complicated. But you might be wondering, "Does my meeting or event, is it considered a conference?" And so, a starting point is for you to read these questions here. It was 10 questions. They consolidated two questions into one, so nothing was really dropped. It—on page 81 of the Financial Guide still lists all 10 questions but we're kind of operating, for now, under these nine questions. And so you need to walk through each of these questions. And respond—so, email your grant manager if you're having a meeting or a conference and you have a cooperative agreement, and you need to make sure that you tell them if you can answer, "no," or "yes," to any of these questions. If you can answer, "no," to all of these questions, you do not have to go through the pre-approval process. If you answer, "yes," to any of these, then you do and you have to do it minimally 90 days ahead of time. There are no exceptions. DOJ will—if you missed any deadlines, they'll tell you you're going to have to reschedule. You can't incur any cost until you go through this pre-approval process. So, it's complicated, and again, only applies if you have a cooperative agreement.

And so, moving on to the next slide. Kind of checking in on folks. A little while ago, we were talking about performance reporting and performance measurements. So we want to know from you, "what system, mechanism do you use to submit your performance data?" So, "do you use or will you be using the PMT, the Performance Measurement Tool; do you use—will—or will you be using TIMS, the Trafficking Information Management System, hint-hint, trafficking; do you have another template that's provided to you; or are you still not sure?" So let us know. Take your poll now and let's just hold on for a little while to get these answers from folks, and then we'll let you know—we will let you know what people say. So while folks are voting, we're going to go ahead and—I'm going to turn it over to my colleague, Brian Sass-Hurst who you all will be—very much enjoy hearing from. So turning it over to you Brian.

**BRIAN SASS-HURST:** Thanks Bethany. Hi everyone. My name is Brian Sass-Hurst, I'm a grant manager, obviously, here at OVC. I specifically work on the team that Joel is on. We call it the State Compensation and Assistance Division. We manage the VOCA victim assistance and victim compensation awards. And so while we move onto the next slide from my beautiful picture, we did get those results in from the poll. And so it looks like quite a few you about 75 percent use the PMT System, about 8 percent used TIMS, and then a few other folks either aren't sure or use some other—some other sort of template.

And so that's really interesting, I think—I think a lot of people are using PMT now for a lot of this reporting.

But I'm going to go ahead and move on, and we're going to talk about the Programmatic Special Conditions. So, Programmatic Special Conditions, these are award-specific conditions and they are active throughout the life of the award depending on the specific grant that you have. So on the next slide we'll start talking about a few of them. If these are things that you have never seen in your grant award before, it may be because it doesn't apply to you. So I know that there are number of folks from VOCA world, the Victim Assistance and Victim Compensation Grants on this call and many of—some of these special conditions are not going to be on the VOCA ones but they'll be on some of our discretionary grants, whether it's a trafficking grant or some of our training and technical assistance projects.

So we'll move on to the next slide, which is about one of the conditions we're discussing and this is about access rights. So when you accepted the award, you agreed to all of those conditions and one of them says that you authorize OJP the access to and the right to examine all records, books, papers, and other documents that are related to this grant, and this also—it's passed through if you subrecipients. So if you make subawards then those recipients are also bound by this condition. So if OVC or any of the other entities at OJP like the Office for Civil Rights, or the Office of the Chief Financial Officer, or the OIG, is doing any sort of review, or audit, or a monitoring visit, we may ask to see certain items. And when you accepted the award, you agreed to provide those to us.

So we'll move on to the next slide which discusses two additional conditions which may or may not be on your award. And so the first one we'll talk about is confidentiality. And so confidentiality is a word that everyone knows, but the special condition that could be relevant to you is regarding providing OVC information about your—how you enforce confidentiality in your programs. So some grantees may have a condition on their award where they are required to provide their internal policies and procedures to their grant manager. And when I say their policies and procedures, I mean, the ones specific to confidentiality. And it would be telling us, basically, what are your internal policies on how you protect your confidentiality of the clients that you serve, specifically their names, their addresses, their phone numbers, and other personal identifiable information. And we are also generally interested in how you share data about your clients with other organizations. So what sort of forms do you use, how do you achieve or obtain consent from your clients before you share their private information with other organizations. And I think anyone working in the field w victims would understand the value of having good confidentiality requirements.

The other confidentiality type special condition which may be applicable to your award are about privacy certificates. And so privacy certificates are on some awards, and these are when OVC has an interest in having a deeper dive into the confidentiality and privacy that your organization has. And the privacy certificate is when you basically fill out a form for us about a few different pieces of information and there is a template. It's a PDF form. I think it's six or seven pages where it will list out all of the various statutes and you'll fill in

some information about what sort of projects you have, what you're doing, what you're—like—when the grant ends, how you're going to dispose of all of the data you've collected. Really it's a really good opportunity for you to have these broad conversations internally and with OVC, and then negotiate how you'll be resolving these important sorts of things. And so with the confidentiality and the privacy certificates, that'll be an interaction between you and your grant manager, and you'll figure out what's going to work for both parties and move on and get the project started.

And so we'll move on to the next slide, but—just if you have questions, concerns, anything like that, talk to your grant manager and they'll be able to sort you out with what it is that you need.

The next—the next condition we're talking about is regarding reporting. And I think we actually talked about this maybe earlier, so I'll just touch on it briefly. But, really, there are three different types of reporting responsibilities that grantees have. So progress reports. A progress report is—in GMS, when you upload either like a PMT output or if you don't use PMT, you fill out some questions and answers about what you've done. Progress reports are usually semiannual for discretionary grants or annually for the formula awards. If you're on a semiannual basis, they're typically going to be due on January 30th and July 30th of each year. And then there's final reports, which are your annual, basically, end of year award progress report, which is going to summarize absolutely everything you've done with all of your funds throughout the entire project. And then that's going to be due at the end of your award, at least within 90 days of the award closing. And there are also financial status reports. We call them FFRs, for Federal Financial Report, I think. These are done quarterly. You will do them in GMS, if you have—you should have a financial point of contact who can login and complete your financial reporting. They're due within 30 days of the close of each quarter. And you should be aware that with any of these—any of these reports whether it's financial or progress reports, or final reports, if you do not submit your report by the deadline, our computers will automatically freeze your funding. So we really recommend you don't do that because nobody wants that to happen. So those are—that's your reporting schedules. And if you have specific questions about how to report or you need a little bit of help figuring out what goes where, just give your friendly grant manager a buzz and they'll be able to help walk you through it.

So let's move on to the—to the next slide, which is going to talk specifically about subawards and procurement contracts. So many folks who receive OVC funds will do a lot of the work in-house. But some will also basically farm some of the work out to other entities. And a lot of times, that's referred to as a subaward. So for instance, if you're a VOCA Victim Assistance grantee, the majority of your funding is made through subawards where you say, "We are going to turn around and use these dollars we received to make a new grant to this other organization who is going to do the work." There are also procurement contracts, which is where you are basically buying something, a service, goods, materials, etc. And there is a very important distinction between what is a subaward and what is a procurement contract. And the distinction is not in what you call it. The distinction is in what the activities being performed under this sort of written agreement are. And in the DOJ Grants Financial Guide, in part 3.14, which I think is on



page 115, has some really good tips on how to determine if something is a subaward or a subcontract. Essentially, there are a few tips you can have if you want to make sure, so subawards are typically going to be where the entity receiving funds figures out who is eligible to receive assistance, they are able to make around decisionmaking, they are able to use funds for a public purpose, which are specified in the authorizing statute. Those are all signs that something is a subaward. Signs of a subcontract, or a contract, are when you are providing funds in exchange for goods and services and—or the organization providing goods and services does that as their business that—or the organization operates in a competitive environment. Those are—those are ideas for how it could be a subcontract. And so whenever you enter into an arrangement where you're exchanging federal funds either for services, or for goods, or you're basically sending funds along and having someone do work for you, it's just really important to know whether we're talking about a subaward or a contract, and you should just be careful to understand the distinction between the two.

And so we'll go ahead and move on to the—to the next slide, which—we'll, wait for that to load. But—so the next slide is regarding failing to initiate activity. And essentially when—One of the conditions on the award, it says—I think it says, like, "OVC reserves the right to take action when the grantee fails to initiate activity or misses time-task lines." So with this special condition, really it's saying that, you know, OVC is granting out funding from oftentimes for, you know, multi-year periods. And if we give out funding to an organization under an agreement where, you know—Funds are provided to an organization and they agreed to do certain activities. If they get the money and then they do nothing, OVC has the right to say, "Hey, you know, we have many other uses for those funds. So we're going to terminate or suspend your award so that we can use these dollars for something else." So as a grant recipient, you have an obligation to do what it is you said that you would do. And if you fail to initiate activity or you miss multiple time-task lines, we do have the option to terminate or suspend your award. However, that's very rarely in our interest because we want the projects we fund to be successful.

So we'll go ahead and move on to the—to the next slide. Something a little friendlier, I guess. The next slide is regarding FFATA, which is the Federal Funding Accountability and Transparency Act. I think the FFATA came out back in—it's been out for some time. I think around the time that those funds were released during the financial crisis. But FFATA is essentially a law that requires organizations receiving funding to publicly report that and then it—the data that they report is fed into a public website, [usaspending.gov](https://usaspending.gov). So that anyone can search for grants that have left the government to see where those funds have gone and what they've gone for, as a way for folks to be able to be aware of how funds are impacting their community, and how their funds—how funds are being expended throughout the country. So generally speaking, if you are a recipient of \$25,000 or more as a subaward, or a recipient, then you are required to be reported in FFATA. So if you receive a grant and you make a subaward to an organization, and that subaward is \$25,000 or more of federal funds, you are required to go online and report information on that subaward. You are required to do the reporting—the timeline's a little confusing, but the report is due by the month—by the end of the month following the month in which the obligation was made. So if I made a subaward today, which is April 30th, then I would be

required to report into FFATA by the end of May, which would be May 31st. But if I do a subaward tomorrow on May 1st, then I won't need to complete the report until the end of June, which would be June 30th. So you should just be aware of the reporting schedule for that.

Generally speaking, it's pretty basic information you have to report starting with the DUNS number, and then a lot of the information is filled in, and you just put in some info about what the purpose of the award is, who it's going to, etc. And in rare occasions, if funds are going to an organization that receives very large amounts of federal dollars, and I think it's like \$10 million plus, then you may be required to report the most highly compensated individuals of that organization. And the FFATA website, which is at [ffata.frs.gov](https://ffata.frs.gov), will guide you through what information must be disclosed.

So we'll go ahead and move on to the next page. I also—FFATA, the website, can be a little bit finicky. So I would very much recommend if you're an organization that needs to do FFATA reporting to not do it on the day that it is due because it can be a little tricky to navigate sometimes. And if you haven't been on in a while, it's really prone to locking you out if you don't change your password frequently enough. So FFATA is something that we always recommend you do earlier, rather than later, because it can just be a little bit difficult to work in sometimes.

Many of you who have been around for a while are pretty familiar with consultant rates. One of—and they're also discussed in the DOJ Grants Financial Guide, which is that OJP has a limit that we do not permit grantees to pay consultants a rate of higher than \$650 per day or \$81.25 per hour. That doesn't mean that every consultant on your award should be paid \$650 a day or \$81.25 per hour, it just means that's the cap, and you should pay folks what they're worth for their services. And when we do talk about a day or a rate, that does include preparation, evaluation, travel time, as well as the actual performance of whatever consultant sort of activity they are being engaged in. If you do need to exceed that rate, you would want to work with your grant manager to submit a GAN, which is a Grant Adjustment Notice, to basically request that that limit be waived for some particular reason. And so you should speak to your grant manager and discuss what your needs are, why the need exists, etc., to try and figure out what would be the best option for you.

But we'll move on to the next page, but basically \$650 per day is the cap. And that doesn't mean everyone should be \$650 per day but it is a cap you should be aware of, and this also does apply to your subrecipients, if you have subrecipients.

So VOCA, I'm pretty sure everyone knows about VOCA. VOCA is the Victims of Crime Act. It's one of the primary funding instruments that exist here at OVC. And VOCA is interesting and that it is set by statute not as a discretionary sort of rules. And one of the— one of the components of the VOCA statute is that there are timing restrictions. So if your funds are made to you via VOCA, so if VOCA is how the funding got to your organization, then the time limitations that apply to VOCA will apply to your award. The timing limitation is that you have access to the funds during the fiscal year of the award plus the following

three fiscal years. And so for example if you were awarded VOCA funds in fiscal year 2018, then you're able to use those funds through the end of fiscal year 2021. And OVC has absolutely no authority to permit extensions beyond that period. And that may be confusing to folks who have discretionary grants through other OJP funds or through other federal dollars because in the Grants Financial Management Guide there's a number of different references to requesting grant extensions, we call them no cost extensions, basically saying, "Hey we need another year to finish our project." Very often those sorts of extension requests are not permitted under the Victims of Crime Act. And so, if you're looking at your project, if you're at the 50 percent mark and you're realizing, you know, we might not be able to finish our project to the amount of time that we have, you may want to look really carefully at your special conditions to see if you have the VOCA statutory requirement special condition on your award because that may restrict you from requesting or receiving—requesting or receiving any extra time.

SHARRON FLETCHER: Hi everyone, my name is Sharron Fletcher and I'm the lead victim justice program specialist in OVC. I work in our National Programs Division. And if we can go to the next slide, I can get started. So you've already heard from my colleagues this afternoon talking about general and Programmatic Special Conditions. And I'm going to spend a few minutes talking with you all about Withholding Special Conditions. So they are different from what we've heard earlier in that they are a temporary special condition. Meaning when you have Withholding Special Conditions on your grant awards these are items that you need to address immediately and that is because Withholding Special Conditions restrict grantees from drawing down or accessing your grant funds until the terms and conditions laid out and that special condition are met. So it's important again that these conditions are addressed immediately to prevent any delays in implementing or starting the projects and providing the services that are going to be supported by your grant. So one of the reasons why more of our grants have Withholding Special Conditions these days is that, we kind of, we being OVC and OJP, generally, have used this as a mechanism to try to shorten award processing time. So sometimes you'll see more of those as a result. And that is because we are using them now to add—adding them to grants where there might be information missing from applications and other items as well. So next slide.

The most common Withholding Special Condition that applies to almost everyone is one of our financial holds for conditional budget clearances. So the Financial Withholding Special Condition, and again is on most of our grant awards. I think the only folks on our calls or webinars this afternoon that wouldn't see this are probably our formula grant recipients, but pretty much everyone else would have this when they receive their awards. So you'll see the special condition language on the award and it will specifically state that the recipient may not obligate, expend, or draw down funds until the Office of the Chief Financial Officer, or OCFO, has approved the Budget and Budget Narrative and a Grant Adjustment Notice, or GAN, has been issued to remove the special condition. And of course all of this is done—the GANs are processed, of course, in GMS, so our Grants Management System. So we call out this language specifically to call your attention to let you know that, first, grantees need to be aware that cost cannot be incurred before the

GAN that's referenced is issued. So that means you cannot incur costs before OCFO approves the budget and you receive notification that the GAN has been successfully processed in GMS. And if grantees incur costs before this time, they risk being asked to pay money back to DOJ, which of course we do not want. So it's very important that we wait for OCFO to issue that GAN and that grantees, as we've mentioned throughout the webinar this afternoon, it's very important that you work with your OVC grant monitor who's going to help kind of service your liaison and point of contact between the grantee and OCFO to address any issues with the Budget Detail Worksheet or Budget Narrative. It's important for you all to be responsive to those requests so that we can get that final approval, so that from OCFO on your budget, so that they can go ahead and issue the GAN to release the conditional clearance. Once that is done in GMS, then it usually will take a few days before you receive a final notification, via email, and that will be sent to the program POC, which is the point of contact, sorry—or in the financial point of contact as well. So it's also important that we keep that information in GMS for whom is listed as point of contact and financial point of contact, it's important to keep those names and email addresses up-to-date for that reason because they'll be receiving these notifications so that you'll know when those holds are released. We go to our next slide.

In this process, those grantees that are charging indirect costs to their grants will also have an additional Withholding Special Condition that will hold funds for their indirect costs. So during that budget review period and while we're waiting, while grantees rather are waiting for their final budget approval, it's a good idea for you all to send copies of your new indirect cost agreement because there can be some lag time between the time of application, and the time that these conversations are happening with your grant managers. But it's a great idea to go ahead and email your most recent indirect cost agreement to your assigned grant manager so that the grant manager can then release that additional hold for indirect costs on your grant. Note that this is again a separate Withholding Special Condition, so there are two. And again, it is important for that indirect cost rate, the most recent one to be shared so that, that can be released. It's also important to note that any changes in your rate, that means that the rate has gone up or if it's gone down, may require you to submit a budget modification. But, that's a conversation you can have again with your grant monitor and when you're talking—when you're submitting and sharing that new indirect cost agreement to make that decision at that time and figure out—and talk through rather that budget modification request, which would also be made in GMS.

Another potential area where you might see a Withholding Special Condition is for single audit. And this is the special condition or Withholding Special Condition that our grantees, that expend more than \$750,000 in grant funds in a year, would see. So this would most likely apply to our larger grantees, like our VOCA state agencies and some other grantees that receive more—multiple large grants. But those grantees that expend more than \$750,000 in grant funds in one year are required to submit their audit reports to the Federal Audit Clearinghouse. And I believe Kris mentioned this earlier. And that audit report is shared online using the Internet Data Entry System that you see on the slide. [<https://harvester.census.gov/facides/account/login.aspx>] It's also an issue that you can work with your grant manager to make sure that it is applied correctly, that you—if you

have submitted that you can share with the grant manager that information just to make, again, to make sure that that is submitted and cleared. If we can go to our next slide.

So I've gone over a few different areas or situations where you might see Withholding Special Conditions added to your award. So here's an opportunity to talk about a few additional. So I did already mention that we use—OJP uses Withholding Special Conditions in a number of situations where grantees may have left out information during the application process. So if grantees have not disclosed pending applications, I believe that item was mentioned earlier by Bethany. Or if we're miss any—missing—or if the application rather was missing a lobbying form, that might be a situation where a Withholding Special Condition is added to the award that requires the grantee to submit one or both of those forms. And again, those would be shared with your grant manager via email so that they can clear that special condition via GAN.

Our new OJP grantees might also have noticed that there's a Withholding Special Condition on their awards requiring them to attend Financial Management Training and I believe Bethany went over this one as well earlier. And this is required—the Financial Management Training is now required for all of our point of contacts, as well as our financial point of contacts that are listed in GMS. So once those individuals for your organization have been through the training, either online or in person, they can email those certificates to their grant managers, so that they can be removed via GAN. Other situations where there might be Withholding Special Conditions added to award include situations where grantees might have issues with either invalid DUNS numbers or expired SAMs claims numbers for their grantee organization or their fiscal organization, and that's the name—organization that's receiving the grant funds. So these situations tend to come up or come to everyone's attention during the budget review process, but there are sometimes situations when they come up outside of that time. Either way, it's important that once grant managers are making you aware that these issues exist and that the withholding is there, it's, of course, important for us to work with you to make sure that we are—or you are addressing whatever those issues are, to make sure that those valid—a valid DUNS number is acquired or your SAMs claims are addressed, so that we can clear those special conditions.

And then the last situation I'll cover is for program strategy and budget. And this happens sometimes during the award process where OVC might add a Withholding Special Condition to require grantees to make specific changes to their program strategy or program narrative as well as their budget. So you'll see this in programs where there might be requirements to perhaps work with local evaluators or attend specific trainings, or for them to have a specific approach used in their work, or—and flush that out. So this—in this instance, we—OVC would use a Withholding Special Condition to compel the grantee to submit either a revised program narrative or a revised budget, so that we can, again, make sure that those requirements are met, depending on the program, of course, and as appropriate. And then we would, again—once we are able to say that that has been adequately addressed, we would then clear that special condition via GAN, in GMS.

So just to recap on the next slide, for how to satisfy a Withholding Special Condition, the first thing we need to do is to take action. So either the grantee needs to go ahead and email those documents to your grant manager, be it your indirect costs rate or any other information necessary, or your grant manager might be in communication with you to make requests through OCFO to revise budgets or submit other information needed to clear the—clear the special conditions on your award. Once we are able to get that cleared up and understand that—and meet those requirements, then either your OVC grant manager or OCFO will submit a GAN in GMS to clear your Withholding Special Condition. Your—Once that GAN receives final approval, both the POC and FPOC listed in GMS, we will receive an automatic email to confirm that it—that the special condition has been removed. That process ordinarily takes as short as 3 days, sometimes it might take a couple of weeks. Primarily it depends on which special condition we are trying to release. Sometimes it can depend on the time of year, during our grant cycle as we get busier, both within OC—OVC and OCFO, there can be a little bit longer time for processing, but we do try to keep those modifications going. So we try to be prompt with that and we appreciate your patience as we do.

So with our final slide—actually, that kind of wraps up my special conditions talk. And we are now moving to a poll question. So OVC is really—we provide training and technical assistance to our grantees in a number of ways, and we wanted to take time out right now to ask what type of TA [would your program benefit from]?”

BETHANY CASE: Okay folks. So this is—this is Bethany again. I'm going to bring us home through the last portion of our webinar. And send you off on your merry way to, I'm sure, read the DOJ Financial Guide, take your online Financial Management Training, all that good stuff. So let's see. I want to kind of say—So I'm going to give you some helpful tips and some resources. But I want to back up and just say, kind of, overall, if you're feeling overwhelmed today, you're not alone. I, myself, was a grantee just 5 years ago and when I first started as an OVC grantee about 10 years ago or 11 years ago, these special conditions didn't make a lot of sense to me. They were overwhelming and frustrating, and I couldn't understand language. Federal Government uses, you know, a very kind of distinct language. And so I just found them really tricky and challenging. Now, 10 years later, I understand them. You—It will not take you 10 years. We will—we will help you and support you to make sure that you understand what you need to do. So we're going to explain it in, you know, plain—in plain language the best that we can. But it's important that you all do your part in reading your award documents, sitting with your colleagues, asking questions, getting everyone in the room at your organization, that means sitting in the room with your program folks, your finance folks, and your administrative folks, and looking through this thing and saying, "What did we get ourselves into and how do we stay on the up and up?" Because you're all doing some really important out there and we want you to continue to support crime victims. You can figure this out. You can successfully manage your grant award.

I'm going to jump back just a little bit because our polling results were in, where Sharron asked everyone, "Hey, folks, what kind of TTA are you looking for from OVC?" And so we got, you know, everything. Every—People want everything. The highest scoring items,

let's see, folks are interested in building capacity, about 20 percent of folks asked for that. And second—tied for second is expanding knowledge on victim services as well as grant compliance. And then generally, folks are also very interested in learning more about managing their financial and programmatic aspects of their grant as well as helping to build program and staff sustainability. So fantastic. Some of these resources and tips that I'm going to go through will touch on each one of those items.

So I just want to also kind of circle back to say to you, this webinar is being recorded and it will be live on—or not live, but it will be posted. Thank you. Posted on the OVC website within about 10 business days, so you can list—listen as much as you like and read through these slides, and the slides will be available as well. If I was doing this all over again 10 years ago, I would probably watch bits and pieces of the webinar at a time to make sure that I understood them. So just know that that's available to you, and please take advantage of it, and please email questions to your grant managers, that's what we're for.

So one other kind of broad announcement that we saw some—many questions coming in from folks who are new recipients of our new Tribal Victim Services Set-Aside Program. Congratulations! The first time ever OVC had a Tribal Set-Aside. We're thrilled to be able to support so many tribal communities. We just wanted to let you know that you're going to be getting a lot of emails from OVC and from your grant managers, and from some training and technical assistance providers about some upcoming webinars to, kind of, orient you to the grants, how to manage your grant, and how to report performance measures. So be on the lookout for some emails coming. There are a couple of webinars for you all only, your—the Tribal Set-Aside folks, coming up in early May. So be on the lookout.

So some helpful tips. Successful grant management takes a team. Like I said, get all of your people in the room together. I would even suggest setting up some type of regular meetings. Maybe you meet quarterly, maybe you meet semiannually, or annually. Get everyone in the room together to make sure you are—you're doing the best that you can. It's worth it. You will get better. You will, you know, improve if this is your first grant award. You will figure it out and this will make future opportunities for applying for all types of grants much easier for you. Review and re-review your documents. Ask questions. Ask questions of your grant manager. Ask questions of your team, at your organization, or other grantees, or other folks. And communicate and coordinate with your OVC grant manager. So some of you, we have—we are so fortunate that we were able to fund so many new grants this year. But we still have the same amount of staff. In fact, a few us retired, a handful. So, we're a little busy but we want to support you the best I can—we can. If we have—your grant manager hasn't reached out to you yet, please go into the Grants Management System and see who's listed as your grant manager, and call us or email us. We're, you know—just rest assured everyone is on your side and we want to do the best that we can for you. And it's—we're just digging out of emails.

So onto the next slide. Some ways that you can, kind of, stay in the know. You can sign up to get regular email updates. There's this email, this listserv. So if you get on the



listserv list, then it sends out email updates periodically.

[[https://puborder.ncjrs.gov/Listservs/subscribe\\_newsfromovc.asp](https://puborder.ncjrs.gov/Listservs/subscribe_newsfromovc.asp)] This is—It's really helpful. I'm actually on the listserv. And I find it really interesting to see, you know, what's going out. Some things I may not even be aware of, so that's a good option. Going to our next slide.

We are on social media. So you can like us on [Facebook](#), follow us on [Twitter](#), and we have videos on [YouTube](#) that you can watch, some more interesting than others. Next slide.

I mentioned this earlier when I was presenting that our attorneys and the financial folks are—because we have just like it takes the team for you all to manage your grant, it takes a team on our end, on the federal end to manage grants on our level as well. So we have our Office of General Counsel, where Kristopher Brambila represented today. We also have our financial office, the Office of the Chief Financial Officer. And so these folks developed this awesome OJP Funding Resource Center, which I think is a great tool for folks. Here's the link here on this slide.

[<https://ojp.gov/funding/Explore/LegalOverview/MandatoryTermsConditions.htm>] And again, this will be available when it's posted online. And let's see. Next slide.

There are a lot of tools kind of at your disposal depending on, you know, what you're looking for. So, some of you who are looking for getting some more information about serving crime victims and learning about different areas of victimization, so the next couple slides are about those resources that are free and available to you. This one is our National Criminal Justice Reference Service. They operate OVC's Resource Center. So, please go check them out and feel free to reach out to them by phone or by email to see if, you know, they can help with some of the items that you're looking for. But if I had—if I was going back to school, which I don't think I will. I would be using NCJRS so much. There's so much literature and publications here just at your fingertips. [[www.ncjrs.gov](http://www.ncjrs.gov)]

So the next slide talks—this is a little bit about our Training and Technical Assistance Center. So we call it TTAC for short OVC TTAC. This is our training arm, so we are able to provide a contract to an organization to operate our Training and Technical Assistance Center. And this is available to everyone even if you don't have a grant, everyone in the field. There are free online trainings. There are—you can request trainings to come to you. You can request certain technical assistance to help build your capacity in some areas. So please, please check out their website if that's something that you're interested in. [[www.ovcttac.gov](http://www.ovcttac.gov)] And—okay. Super great resource.

So the next few slides are some links, some web links to some of the resources that we've mentioned. I'm not going to run through these because they'll be available online for you. But these are kind of reflecting, you know, reinforcing some of the resources that we've talked about throughout today's webinar. [LINKS APPEARING ON THE SLIDE: DOJ Grants Financial Guide: [ojp.gov/financialguide/DOJ/index.htm](http://ojp.gov/financialguide/DOJ/index.htm); OJP Grants Resource Guide: [ojp.gov/funding/](http://ojp.gov/funding/); OVC Website: [www.ovc.gov/](http://www.ovc.gov/); Office of Justice Programs (OJP) Website: [www.ojp.gov/](http://www.ojp.gov/); DOJ Grants Financial Management Online Training:

<https://ojpfgm.webfirst.com/course/>; FFATA Subaward Reporting Webinar:  
<http://ojp.gov/funding/Apply/Resources/FFATASubawardReportingWebcast.wmv>]

And the next slide also provides some web links, important websites. [LINKS APPEARING ON THE SLIDE: Performance Measurement Tool: <https://ovcpmt.ojp.gov>; Trafficking Information Management System: <https://tims.ovcttac.gov>; National Criminal Justice Reference Service: [www.ncjrs.gov](http://www.ncjrs.gov); FFATA Subaward Reporting Webinar: <http://ojp.gov/funding/Apply/Resources/FFATASubawardReportingWebcast.wmv>]

And I will walk you through some important contact information, two telephone numbers. First of all, you can ask us anything, your grant managers. Sometimes we'll redirect you to certain spots. So these are some of the spots that we will redirect you to. And you could call them before us if you know that that's who you need. So if you're having trouble or have questions about—you're in the Grants Management System, GMS, you can call the GMS helpdesk [888-549-9901]. They can walk you through some things. I had a question from a grantee the other day about, "how do I change a point of contact." So I gave my grantee some hints, but then also said, "Hey, if you can't figure out while you're logged in, give GMS Helpdesk a call. They can walk you through this stuff." That's what they're there for.

If you have any financial related questions, you can reach out to the Office of the Chief Financial Officer directly to ask some questions. You might want to also—if you're reaching out to them, CC your grant manager on an email. That, you know, that will be super helpful to keep, kind of, everyone in the—in the—in the loop. But general questions, you can certainly ask them.

So, we are at the end. And questions and answers. We've been getting some questions?

JOEL HALL: Yes. I'm going to go over some questions. I'm not going to go over them all because there were a lot of questions. But we're going to go over some that can be recorded for the future transcripts as well as if people who haven't read—been keeping up with them that will pertain to many of them.

Here's one from Mildred. It says, "We—Will we be notified that we need to take the Financial Management Training?"

The answer is no. There's no automatic notice that goes out. If you are a point of contact in GMS or financial point of contact, yes, you will be required to do that. No, you will be—not notified if it expires. You need to keep up-to-date on that. Remember it expires in every 3 years. So if you have not taken it, the answer is yes, you need to take it.

Going in the top of that question, "does the Financial Management Training requirement apply to alternate POCs?"

The answer is yes. Alternate POCs, or if there are multiple financial point of contacts, they all need to be taking this training. So my advice to many of the grantees is if you don't need to put that person down, don't. It's not—It's okay to have multiple financial point of contacts. So, a lot of times large organizations have multiple people, but you don't need to put everybody—your multiple level of supervisors, multiple alternate point of contacts or financial. So, put as many as you need to, not many as you want. I'll just say it that way.

I got a question that we talked about [on] one of the slides. “Does cap—does the cap on consultants mean that for example, they could make \$100 an hour as long as they do not go over the \$650 a day?”

No. If you re-review that slide, you'll see—you cannot exceed \$81.25, I think is what it was per hour, max being \$650 per day. Let's go. Let's see.

“Who initiates the OCFO budget clearance GAN, which is called the Grant Adjustment Notice?”

That would be the OCFO Budget Analyst. So you are not responsible for doing that. Either the Program Office or the Financial Office at OJP, which is us, we will initiate once the final financial clearance is done. We will initiate that GAN to remove the special conditions so that you may begin drawing down your funds. That is not something that you need to do.

“Do Tribal Set-Aside awardees have to report into FFATA?”

The answer is maybe. Generally, no. Most—I can't think of too many that I've read that would. But if...

BETHANY CASE: they're providing subawards...

JOEL HALL: But—yes. But if the part of the maybe is, if they happen to have subrecipients, and you might have a large tribe that has a large infrastructure. So if there are subrecipients, then yes, they would have to report into FFATA.

BETHANY CASE: I saw someone ask, and Joel I'm sorry if you already said this but, “will I get notified that I need to participate in this training?” And this is...

JOEL HALL: The financial training?

BETHANY CASE: This is your—this is your notification. And your award document is your notification. You won't get any additional notification. So it's very important that you review this award document. If you don't know what this thing is, go to your leadership and say who, you know, who has access to GMS? What is this award document, folks are talking about that has all the special conditions? Can we get a copy? Can we review it together? And you all need to have that as part of your grant file, as well that you maintain. Along with your grant application and your approved budget and all sorts of grant documentation. But we'll have future webinars about that. We're creating a series so hopefully these are helpful.

JOEL HALL: If you missed anything, we will have the transcripts posted in two weeks, give or take. It could be a little more. It could be a little less. And it—and any new staff that may have that missed this training, they can go to our OVC website at [ovc.gov](https://www.ovc.gov) and in two plus weeks, you can—they can watch this whole training in its entirety. So again, I want to thank you all. And I don't see any more questions that I can answer right now. Thank you and hopefully, for the next series, which we will have soon, you will also participate. Thank you.