



United States Department of Justice

Office on Violence Against Women

Working Together to End the Violence

***Presentation on Grants Financial
Management – Updates with new
Guidance***

All TA Provider Meeting

November 17, 2015

OVW

GFMD Contact Information

How to contact us --

OVW GFMD:

1-888-514-8556

Fax: 202-514-7045

OVW.GFMD@usdoj.gov

OVW award acceptance:

OVW.acceptance@usdoj.gov or

Fax 202-514-7045

OVW GMS technical assistance (other than password resets):

OVW.GMSSupport@usdoj.gov or

1-866-655-4482

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New Guidance

Consolidates and supersedes previous circulars:

- Administrative Requirements: A-102, A-110
- Cost Principles: A-87, A-122, A-21
- Audit Requirements: A-133
- Catalog of Federal Domestic Assistance: A-89
- Audit Follow-up: A-50

Uniform Guidance is now located in 2 CFR Part 200

http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

Effective Date

Effective Date:

- Awards issued after December 26, 2014
 - Applies to all OVW awards that start with the year “2015” (and after)
- Does not apply retroactively to existing awards
- Exception: Audit requirements effective for audits of Fiscal years beginning on or after December 26, 2014

Subpart A: Acronyms and Definitions

Section 200.00-200.99

- **Changes made to harmonize definitions between previous circulars**
- **Vendor vs. Contractor**
 - Same meaning as in previous guidance, but now only refers to Contractors and eliminates Vendor
- **Supplies**
 - Clarifies computing device is a supply if the cost is less than \$5,000 (or less than the recipient's threshold if lower) regardless of useful life

Subpart B: General Provisions

Section 200.100-200.113

- **Applicability of Guidance**
- **Effective Date**
- **Conflict of Interest**
 - Recipients must disclose in writing any conflicts of interest to Federal awarding agency
- **Mandatory Disclosures**
 - Recipient must disclose in writing any violations involving fraud, bribery, or gratuity affecting the award
 - Applies to subrecipients and pass-through entities

Subpart C: Pre-Award Requirements

Section 200.200-200.211

- **Establishes requirements for notices of funding opportunities**
 - Requires Federal agencies to post funding announcement on www.grants.gov with standard data
 - Describe merit review process of proposals for competitive awards
 - Open for 30-60 days for competitive awards (with some exceptions allowing less than 30 days)
- **Pre-Award Risk Assessment**
 - Suspension and Debarment, responses to Financial Accounting Practices, review of audit submissions, etc.

Subpart C: Pre-Award Requirements

Section 200.200-200.211 (continued)

- **Special Conditions may be added to the award**
 - Based on assessed risk, previous compliance failures, past performance, etc.
 - Pass-through entities may impose on subrecipients
- **Details required information for all Federal awards**
 - Standard data elements
 - General terms and conditions
 - Required to make publically available

Subpart D: Post-Award Requirements

Section 200.300-200.345

- **Standards for Financial and Program Management**
 - Strong and effective internal controls that comply with Federal statutes, regulations, and special conditions
 - Financial management systems must meet requirements
 - Pass-through entities may impose this requirement on subrecipients
- **Subrecipient Monitoring and Management**
 - Subrecipient versus Contractor Determinations
 - Requirements for pass-through entities

Subpart D: Post-Award Requirements

Section 200.300-200.345 (continued)

- **Budget Modifications (require GAN)**
 - Cumulative change between approved categories greater than 10% of total award amount (does not apply to awards less than \$150k)
 - Change in scope of the project
 - Moving funds into a category not approved in budget

Subpart E: Cost Principles

Section 200.400-200.475

- **Costs must be:**
 - Allowable: compliant with limitations and restrictions
 - Reasonable: prudent person test
 - Allocable: portion of cost relative to benefit received
- **Prior Approval (200.407)**
 - Lists the areas the various Prior Approval requirements may be found
 - E.g., Program Income is found in 200.307

Subpart E: Cost Principles

Section 200.400-200.475 (continued)

- **Indirect Cost Rates**

- Negotiated rates must be accepted by all Federal awarding agencies (with rare exceptions)
- One time extension for period of up to 4 years

- **De Minimis Rate**

- Can be used by recipients that have NEVER had a Federally approved Indirect Cost Rate Agreement
- Subrecipients (not contractors) use the same guidelines as recipients
- Charge 10% of MTDC without negotiating the rate
- Charge costs consistently as in/direct for all awards
- May be used indefinitely

Subpart E: Cost Principles

Section 200.400-200.475 (continued)

Selected Items of Cost

- **Audit Services**
 - Costs of audits NOT required by Single Audit Act and/or Subpart F are not allowable
- **Family-related Leave**
 - Must be reasonable and included in written policies
- **Conferences (definition expanded)**
 - Costs may be restricted by terms/conditions of award
 - Costs must be appropriate, necessary and kept to a minimum
 - Allows costs of identifying, but not providing, locally available dependent-care resources

Subpart E: Cost Principles

Section 200.400-200.475 (continued)

Selected Items of Cost

- **Materials and Supplies**
 - Definition expanded to include computers (provided they do not meet recipient's capitalization threshold)
 - Can charge computing devices directly if essential and allocable to project
- **Participant Support Costs**
 - Expanded to now cover all recipients, not just nonprofits
 - Excluded from MTDC for indirect base

Subpart E: Cost Principles

Section 200.400-200.475 (continued)

Compensation – Personal Services

- **Changes with requirements to support salaries**
 - Focuses on requirements and standards for strong system of internal controls
 - Charges must be based on records that accurately reflect work performed
 - Personal activity reports not required unless recipient chooses to maintain as part of internal control or if required by Federal agency

Subpart E: Cost Principles

Section 200.400-200.475 (continued)

Compensation – Personal Services

- **Standards for Documentation**

- Charges based on records reflecting actual work performed
- System of internal controls ensuring charges are accurate, allowable, and properly allocated
- Incorporate into official records
- Reflect staff's total activity
- Includes both Federal and non-Federal funded activities
- Comply with established policies/procedures
- Support distribution of salary/wages among different activities/cost objectives
- Estimates alone do not support charges

Subpart F: Audit Requirements

Section 200.500-200.521

Single or Program Specific Audit

- Threshold increased to \$750,000 or more of Federal funds expended during FY
- Previous threshold was \$500,000
- Applies to FY beginning on or after Dec 26, 2014

EXAMPLE:

FY2014: 7/1/2013 – 6/30/2014 → Follow A-133

FY2015: 7/1/2014 – 6/30/2015 → Follow A-133

FY2016: 7/1/2015 – 6/30/2016 → Follow Uniform Guidance

Appendices

- **Appendix I:** Full Text of Notice of Funding Opportunity
- **Appendix II:** Contract Provisions for Non-Federal Entity Contracts Under Federal Awards
- **Appendix III:** Indirect Costs Identification and Assignment, and Rate Determination for IHEs
- **Appendix IV:** Indirect Costs Identification and Assignment, and Rate Determination for Nonprofit Organizations
- **Appendix V:** State/Local Government and Indian Tribe-Wide Central Service Cost Allocation Plans

Appendices

- **Appendix VI:** Public Assistance Cost Allocation Plans
- **Appendix VII:** States and Local Government and Indian Tribe Indirect Cost Proposals
- **Appendix VIII:** Nonprofit Organizations Exempted from Subpart E – Cost Principles
- **Appendix IX:** Hospital Cost Principles
- **Appendix X:** Data Collection Form (Form SF-SAC)
- **Appendix XI:** Compliance Supplement



Questions?

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