Missouri Department of Social Services, Division of Finance and Administrative Services, VOCA Unit



2017-2019 VOCA Compliance Training Frequently Asked Questions (FAQ) October 2017

WEBGRANTS:

Will WebGrants be used for the new 2017-2019 contract?

- Any archived VOCA applications will be available to the agency in WebGrants if the agency is an active user with the Missouri Department of Public Safety (DPS); however, WebGrants will no longer be used for 2017-2019 VOCA and forward.
- Agencies with a previous VOCA grant have 90 days from the contract end date, September 30, 2017, to make final payments. Please make final claims in WebGrants by December 5, 2017 to ensure payments are through the entire process by December 30th.

Contract:

Contracts should have been sent to awarded agencies by Procurement. If the agency has not received a Notice of Award or are missing any documents associated with the contract, please contact Procurement at 573-751-7036. Here are a list of Attachments and Exhibits that should accompany the contract:

- Exhibit 1- Business Entity Certification, Enrollment Documentation, and Affidavit of Work Authorization
- Exhibit 2- Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion Lower Tier Covered Transactions
- Exhibit 3- Federal Funding Accountability and Transparency Act (FFATA) Data
 Form
- Attachment C- Sample Invoice Form
- Attachment D- Change of Information Form
- Attachment E- Subgrant Award Report (SAR)
- Attachment F- Sample Purchased Equipment List

Please read the contract carefully and should there be any questions regarding the contract, the Attachments or Exhibits, please contact procurement.

The contract and all forms cited above are required and necessary before entering into contract.

In accordance with 2.3.1, please submit within 5 days of the contract of award, the contractor shall provide the Department with the name, address, email address, and telephone number of the contractor's representative servicing the contract. This is <u>not</u> a form found in the contract. An email with that information should be sent to <u>dfas.vocaunit@dss.mo.gov</u>. If this information should change throughout the contract, please let submit a Change of Information Form (Attachment D) to the dedicated VOCA email address noted above.

If professional contracts (for contracted services by an agency) are less than a year old can they still be used and just renew them annually?

Yes, only professional contract less than a year may be renewed for up to three (3) years, unless it is a contract for safety improvements.

When it was stated that agencies are to sign the contract and form 943- Is the "contract" in reference to the first page of the download?, if agencies already have a "Vendor No Tax Due" letter from the Dept. of Revenue that does not expire, do agencies need to request another letter? Can agencies just provide a copy of the letter received previously?

Yes, the contract, Exhibits and Attachments are all separate forms. The person with signature authority for the agency must sign the contract and all other forms provided. Be sure to check each page for signature requirements. If documents are missing after the contracts are sent back to Procurement, one of their team members will contact the agency. Each time a contract is awarded a "Vendor No Tax Due" letter must be requested from the Department of Revenue and supplied with the contract documents.

With the Subgrant Award Report (SAR) Attachment E, may an agency submit all documentation at once or can agencies submit what they have, then add to it later?

All documentation should be submitted at once to be sure nothing is lost or separated. Agency should be sure all information is entered correctly for contract year 2017-2019.

Will the SAR be sent out as a separate fillable document or do you want it handwritten?

Agencies may convert the document in Adobe to have a fillable document or print, hand-write, scan and email the document with the contract documents.

If an agency submitted the SAR already with the old contract information, does the agency need resubmit those with 2017-2019 data?

Yes, the SAR is a federal requirement and needs to be submitted for the current contract year 2017-2019.

Changes of Information:

The Change of Information form is Attachment D in your Contract documents. Please use this form throughout the contract period for changes such as positions funded, Authorized Official, Project Contact person(s) and personnel differences.

When a new staff person begins in a position, do agencies need to send this (Change of Information) form?

VOCA staff track funded positions and the Department recommends updating VOCA staff about those funded positions. For site monitoring purposes, the agency needs to keep internal records of who is in funded positions and their rate of pay.

Does the Change of Information form(s) need to be submitted and approved in advance of changes made?

VOCA Staff will need to be informed of changes to project contact person(s) as soon as possible, at least within a five (5) day window from the change in personnel.

Invoicing/Eligible Activities:

The sample Invoice is Attachment C in the contract forms. This sample may be used or agency may create their own. If using the sample invoice, please be sure to add the agency logo on both pages one (1) and two (2). If creating an invoice, please be sure to include the following:

- Include two (2) pages on the invoice, one for expenditures and a second for victims served and travel/training data. Be sure to add the agency logo or use agency letterhead on both pages
- Mimic the sample data form with the exact information provided. These are requirements of an invoice. All information must match what is in SAM II for remittal of payment.
- Be sure each invoice has a unique invoice number. Up to 10 characters may be used per invoice.
- Submit a copy of the invoice you would like to use to the dedicated VOCA email dfas.vocaunit@dss.mo.gov

Please submit invoices at a minimum of monthly. There is not a due date associated with invoices, once per month at the agency's convenience is fine.

Please be sure to invoice the proper category for an item. Documentation will not be necessary when submitting an invoice. Personnel should be invoiced for the eligible percentage of time worked per pay period and may fluctuate throughout the contract.

Finally, be sure to retain documentation for all items invoiced to VOCA, although documentation is not required monthly, each agency will go through the site monitoring and desk monitoring processes at which time documentation will be requested.

Will the project be retroactive to October 1st or is it effective after the completed SAR is received?

The project start date is October 1, 2017.

Are agencies required to spend the full awarded amount for each category for each of the three funding periods? Or just by the end of the last funding period?

Yes, funding allotted for each of the three independent funding periods is only for that specified time frame only. There are three unequal time funding periods to coincide with the state fiscal years: period one is October 2017 – June 2018; period two is July

2018 – June 2019; and period three is July 2019 - September 2019. Any unused funds for the funding period will revert back to the Department.

On the invoice, what should Total Amount equal?

Federal dollars + Match dollars =Total Amount

Out of the total number of Victims served, how many of those victims were "new" to the <u>invoice</u> period?

This means how many victims received services for the first time as a new client. This could also include previous clients seeking services for a new/different victimization occurrence.

If an agency decides to go to a different training seminar than was requested in the application but is VOCA eligible, can an agency invoice VOCA for it? Does this include training which has already been approved?

Yes, agencies may attend a different training and request reimbursement through VOCA as long as a training request is submitted to VOCA Staff at least 30 days <u>prior</u> to the event. Please, submit the dates, agenda and number of persons attending. This does include training requested at application. All trainings must be pre-approved.

Once an invoice has been submitted, when should agencies expect payment?

Once the VOCA Unit receives an invoice the agency can expect payment within 15 working days.

For further questions please email <u>DFAS.VOCAUNIT@DSS.MO.GOV</u> or call 573-751-5775. The Fax number is 573-751-7598 and the mailing address is PO BOX 1082, Jefferson City, MO 65102-1082.

Do volunteer hours need to be entered on the invoices or just on the activity sheets?

The number of volunteers utilized for the reporting period is required on the invoice. However, individual volunteer timesheets are required documentation for compliance with site monitoring purposes.

Is paid time off still reimbursed the same percentage as the allowable time? And does this include maternity leave?

Reimbursement for maternity leave as well as other paid time off would refer back to the subrecipient agency's employee policy manual. If it is available to all employees, then it is available to VOCA funded employees. If it is not available to all employees then it is not available to VOCA employees. It is also possible for VOCA to reimburse for another employee to "fill-in" a shift for extended leave purposes. These requests can be

sent to the dedicated email address, dfas.vocaunit@dss.mo.gov or to the VOCA Specialist.

If an agency moves items from the equipment category to the supplies category, would the agency be able to be reimbursed for 100% of the cost or does the agency have to use the operations allocations percentage? Also, for equipment, is the \$5,000 per each item or per line item (if a number of the same items total at least \$5,000)?

VOCA funds always have to be used for the prorated portion that is VOCA eligible, which in some cases may be 100%. An individual item that is \$5,000 is equipment. Several individual items when purchased in bulk and add up to \$5,000.00 would still be considered Supplies/Operations.

Is contract billing due at least every 31 days - do agencies need to stick to that, or could it be longer, as long as there is one every calendar month?

The Department prefers monthly invoices for expenses from the previous calendar month. However, if alternate invoicing is needed, please contact the agency's assigned representative at the VOCA Unit to make arrangements.

Will there be exceptions for the first month invoicing since many agencies are still waiting on 943 forms?

Yes, Agencies will be able to invoice back to October 1st.

In the webinar, it was discussed that the flexibility with the funding categories and not having line items. Can it be assumed that everything requested in the funding proposal was "VOCA eligible" if the entire amount was approved?

Yes, the amounts and percentages would be eligible unless there is decreased funding in a category. Please contact the VOCA Unit if there is ever doubt of eligibility of an expense. Ineligible payments will be recouped from the agency.

Will it be a problem if percentage of time on VOCA is more than what can be invoiced?

The only issue would be invoicing ineligible or unallowable time or activity. Any percentages of time worked on the grant must be documented

May an agency submit electronic signatures on an invoice?

An electronic signature is not recommended based on past auditing experiences. It is recommended that there be an original signature on an invoice delivered by the United States Postal Service or a scanned and emailed signature on an emailed invoice.

When do agencies need to submit the first invoice? And, when is the contract due to be returned?

The first invoice may be submitted as soon as the contract is fully executed. Procurement will inform the VOCA staff when each agency's contract is underway. The contracts must be underway within 45 days from issuance date of the contract as noted in the financial guide. https://dss.mo.gov/dfas/victims-of-crime-act/files/DSS-Financial-Guide.pdf

If the agency purchases an equipment item during the first period, there will not be enough funds during that period to invoice for staff salaries according to the contracted time frames and dollar amounts. What does the agency need to do?

Unfortunately the contract dollars and timeframes are not flexible as it is based on the legislatively granted spending authority per period.

Timesheets:

The sample timesheet can be found on the VOCA website at https://dss.mo.gov/dfas/victims-of-crime-act/. Agencies may use the sample timesheet or create one that is tailored to the needs of each position. Only allowable activities need to be broken down in relation to time. All unallowable activity can be recorded under one column. However, all working hours in a pay period or for the month must be documented in some manner.

Timesheets should be retained for each VOCA funded position (direct or indirect) and direct service and/or On-Call Volunteers. Even if an agency is not invoicing for volunteer time as match, volunteer timesheets should be retained as the utilization of at least one direct service volunteer is a federal requirement.

If creating your own timesheet, please submit a copy to dfas.vocaunit@dss.mo.gov before use. If timesheets are not used an acceptable, documented, valid cost allocation method must be utilized and documentation provided upon request.

If agency staff still have questions, are confused, or have concerns about VOCA activities and compliance who should they contact?

Simply contact the VOCA Unit at 573-751-5775 for DFAS.VOCAUNIT@dss.mo.gov and a one-on-one on-site training or conference call can be scheduled at the agency's convenience. The VOCA Unit at DSS/DFAS is here to ensure service to victims and agency success!

May an agency submit electronic signatures on timesheets?

Original signatures are recommended and best practice for all volunteer or paid personnel timesheet documentation. Paid personnel or volunteers that work offsite should print, sign and scan this documentation back to the Supervisor.

Are employees required to still track every 15 minutes on their timesheet?

This is left to the discretion of the individual agency. Agencies may use a timesheet to best suit individual agency needs. It is best practice to break down workdays by hours; however, if minimal time is spent on an activity, .25 for a quarter hour or .50 for a half hour may be utilized.

Match:

The VOCA funds used by an agency must be matched at 20% of the total project cost, cash or in-kind, and the source of the match must be described. The 20% match requirement must be met by the end of the contract, September 30, 2019. Match is not required to be reported on each invoice, but should be reported as soon as it is incurred or acquired.

Match may be reported in any category attained even if it was not originally budgeted in the application. Match should be reported in the <u>match column only</u>. This includes items such as donations, personnel time and direct or On-Call Volunteer time. Match is not reimbursable; however, the valuation of the donated item should be recorded to account for the proper match amount. Match valuation should be calculated by the agency and reported in the proper category. Calculation methodology must be documented and retained.

Does DSS have a sheet of values for in-kind donations?

At this time, DSS does not have a sheet of values for in-kind donations. Using a fair market value from similarly priced items, second —hand markets or specialty dealers would be considered a good valuation of a donation. For large items, such as a vehicle, use documentation from a local dealership or from respected sites such as National Automobile Dealers Association (NADA) for the correct market value. Agencies must ensure that valuation documented and preserved is reasonable, articulable and accurate.

If the agency has been able to obtain enough volunteer hours to fulfill the match requirement, how would that be reflected on the invoice?

It would be reflected in either the Volunteer or the On-Call Volunteer categories based on the type of volunteer time provided. Direct service, in house, volunteer time is reported hour for hour and valued at \$18.00 per hour. On-Call Volunteer time is counted one for every four hours on call and valued at \$18.00 per hour.

Can agencies still submit a match waiver request letter?

No, the Department will not be able to accept match waiver requests after application.

If agencies requested a match waiver at time of application but were awarded a different amount from what we requested, should we re-submit with revised amounts?

The VOCA Program Manager, will contact the agencies that submitted a match waiver with further instructions.

Contract Adjustments:

The contract amendment procedure differs quite a bit from the prior VOCA award, if you are an agency that held a contract previously. The contract amendment initiation form can be found on the VOCA website at https://dss.mo.gov/dfas/victims-of-crime-act/. The form is already fill-in enabled.

- The form must be completed in its entirety before it may be submitted.
- Be sure to check each box of the categories to be amended and provide a brief justification with dollar amounts and reason for amendment.
- A contract adjustment is not necessary if the amount to be moved is 10% or less than the entire contracted amount.
- The amendment must be completed prior to the requested changes. An amendment may not be made after the fact.
- Funding will not be "frozen" while and amendment is in process. The original funds in the category will still be available for reimbursement. Any funds requested to be moved will not be reimbursable until the amendment is fully executed.

How many contract amendments are allowed?

There is no cap on the number of contract amendments.

May funding be added in a new category via the Contract Adjustments? For example, adding a Travel/Training category that was not originally requested in the application?

Agencies <u>cannot</u> request additional funds; however agencies <u>can</u> request to move awarded funds to any eligible category even if it was not previously requested and funded.

If the entire equipment budget was disbursed among other categories, but there is an expense that would qualify as an equipment expense, can an adjustment be submitted to move money from one category to another?

Yes, agencies may request a contract amendment to transfer funds from one category to another. However, it is highly recommended to check with VOCA Staff to ensure the equipment item meets the equipment threshold (\$5,000 or more per individual item) and is VOCA eligible and allowable.

Reports:

Quarterly and Annual Reports are a federal requirement and therefore will be necessary for each agency to submit. An email from the VOCA Unit will be sent soon with the reporting

spreadsheet. Each agency is required to fill in all data requested on the spreadsheet each quarter. The quarterly data will auto-tabulate into annual data. The tracking document has an assigned "sheet" per quarter, another sheet marked Annual and a final sheet marked Annual Narrative.

Due dates for each quarterly report:

- January 30, 2018 & 2019
- April 30. 2018 & 2019
- July 30, 2018 & 2019
- October 30, 2018 & 2019

Due dates for each Annual Report:

- October 30, 2018
- October 30, 2019

Quarterly and Annual reports may be submitted together on October 30th of each year. Two submissions are not necessary.

Under "new" victims served on <u>quarterly report</u>, should this be new individuals or different instances of abuse?

Each new victim should be counted once for the contract period. The individual may have been victimized multiple times; however they would only be counted as "new" once per contract period.

Will the quarterly/annual report Excel document contain the same data? I know agencies don't have to submit a report until January but want to make sure agency VOCA staff is collecting the right info now.

The documents are the same as they were in the past contract. There is one additional item to be tracked- Number of *anonymous or unidentified* victims. If agencies add this category to what they are already tracking it would be helpful. The Department will send an updated quarterly/annual tracking tool as soon as it is available. If a new agency wants training on this, contact the VOCA Unit at 573-751-5775 or DFAS.VOCAUNIT@dss.mo.gov.

Site Monitoring and Documentation:

Site monitoring is a requirement of VOCA. Each agency is to be monitored per contract cycle for compliance with state and federal VOCA guidelines. Site monitoring consists of three (3) components:

- Random Sampling will occur throughout the contract cycle. VOCA Staff will ask documentation be sent in with a corresponding invoice. For instance, payroll information may be requested for the month of December, Invoices or receipts for travel/training may be requested in June. This will be a random occurrence throughout the contract cycle and VOCA Staff will notify each agency in advance of requested documentation.
- Desk monitoring will occur throughout the contract cycle and is slightly more intensive. VOCA Staff will notify each agency, in advance, when desk monitoring is to occur. All documentation pertaining to an invoice will be required. For instance, all documentation associated with the March invoice may be requested by VOCA Staff to perform desk monitoring.
- On-Site monitoring will occur during the contract cycle when VOCA Staff come on site to visit and tour each agency. VOCA Staff will send, in advance, a monitoring report for each agency to complete and submit before staff come on site. The report consists of open ended narrative and yes/no questions. A letter confirming the date and time will be sent to each agency along with the report.

Documentation retention is important for the monitoring process and therefore all payroll, volunteer, invoices/receipts of expended funds or donated items, professional contract and all other documentation for VOCA related expenditures should be pulled and easily accessible for the on-site visit or upon request.

If an item is no longer classified as equipment, does the agency still need to track that item? (For example, a computer for VOCA funded staff).

Documentation of the purchase item must be maintained for monitoring purposes. The documentation needs to include the invoice, model number, serial number etc.

For how long does each agency need to retain documentation?

Documentation retention is five years from the contract period end date or until an ongoing audit is complete. For this contract, that would be at least September 30, 2019. If there are agency audit findings, agency must retain documentation an additional 3 years from date of audit.

A Site Visit report in WebGrants was just completed. Does this mean the agency has to start over again with different documents?

The site visit report submitted in WebGrants was for the last contract cycle, April 1, 2016-September 30, 2017. The new site visit report discussed in this compliance webinar is for this new contract period October 1, 2017-September 30, 2019. This report and procedures are still in the approval process; however it will be a brand new

report. Your VOCA Specialist will contact the agency for this new process and answer all questions.

References:

The compliance webinar PowerPoint is available on the website at https://dss.mo.gov/dfas/victims-of-crime-act/ click on Compliance Webinar.