



# Grantee Guidelines

Fiscal Year 2025 – Updated 11/2024



Michigan Department of Health & Human Services

Division of Victim Services

<https://www.michigan.gov/mdhhs/safety-injury-prev/crimevictims>

# FY 2025 MDHHS Division of Victim Services

## Grantee Guidelines

### Grantee Guidelines Introduction

These procedures are designed to assist DVS in fulfilling its responsibility to safeguard and ensure that all funds are used for the purposes for which they were awarded. This manual is intended to serve the following purposes:

- **Guidance to Grantee organizations** – Grantees/Subgrantees receiving funds are required to comply with applicable laws, rules, and regulations, not all of which are included or referenced in this document.

Visit the links below for more information about the Michigan Domestic Violence Prevention and Treatment Board (MDSVPTB), Michigan Crime Victims Services Commission (MCVSC) and the Division of Victim Services (DVS).

- [Michigan Domestic and Sexual Violence Prevention and Treatment Board](#)
- [Michigan Crime Victims Services Commission \(MCVSC\)](#)
- [Division of Victim Services](#)

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# DVS Guiding Statement

The Michigan Department of Health and Human Services Division of Victim Services (DVS) partners with victims/survivors, and those who interact with victims/survivors to meet a shared vision of providing and supporting direct services and systems change efforts across Michigan. In collaboration with state and local victim service providers, DVS works in partnership to develop sustainability and excellence in victim services. DVS administers grant programs to support services that are:



**Culturally honoring:** The Grantee understands, acknowledges, and respects the uniqueness of individuals and families served. Services and supports offered shall respect the differing realities, values, and beliefs of victims/survivors with a consistent promotion of non-violent inclusionary practices. The Grantee shall utilize intervention strategies and supports that will honor and respect the individual cultures, needs, and identities of victims/survivors and their loved ones (including linguistic, geographic, religious, economic, ethnic, racial, developmental, disability, sexual orientation, and gender identity) in a safe, inclusive, and welcoming environment.

**Victim-focused:** A victim-centered approach seeks to eliminate re-traumatization by providing support and empowering survivors with a focus on the needs and concerns identified by the victim. The victim’s wishes, safety, and well-being take priority in all matters and procedures.

**Centered on autonomy:** Respecting the victim's right to choose which services they would like to participate in and giving the victim/survivor power to direct their life.



**Prioritizing healing:** The focus is on the survivors healing over participation in external systems/events such as testifying in court.

**Trauma-informed:** A trauma-informed approach begins with understanding the physical, social, and emotional impact of trauma on the individual, as well as on the professionals who help them. It incorporates three elements: 1) Realizing the prevalence of trauma. 2) Recognizing how trauma affects all individuals involved with the program, organization, or system, including its own workforce. 3) Responding by putting this knowledge into practice. A program or organization that is trauma-informed realizes the widespread impact of trauma on victims and understands potential paths for healing; recognizes the signs and symptoms of trauma in staff, clients, and others involved with the system; and responds by integrating knowledge about trauma into policies and procedures. While each individual's experience of trauma may be different, it is important to understand how it can tax the individual's coping resources and lead to the initiation of biologically driven survival strategies. Trauma may be the result of a single event (natural disaster, witnessing or experiencing a violent act) or a series of ordeals (long term abuse). [Using a Trauma-Informed Approach \(ovcttac.gov\)](https://ovcttac.gov)

**Inclusive:** Awareness of and ensuring that the environment and services are welcoming for all. The Grantee may not exclude, deny benefits to, or discriminate against any person on the basis of actual or perceived race, color, religion, national origin, sex, disability, sexual orientation or gender identity in any program or activity funded in whole or in part with funds made available under this grant. The organization recruits a diverse staff that is reflective of the community, clients served, and geographic area in which the organization is located.

**Accessible to all:** The Grantee will take reasonable steps to provide services and information in appropriate languages, other than English, to ensure that persons with limited English proficiency are effectively informed and can effectively participate in and benefit from its programs, services, and activities. Program facilities must allow for full participation of clients with a variety of needs.

## Glossary of Terms

Common Terms	Definitions
Competitive Application	A competitive process of issuing a public request for proposals with the intent that agencies will put together their best proposal and compete for a specific project. May also be referred to as a Competitive Request for Proposal (RFP) or bid. The original proposal plus any additional requests or materials as required by MDHHS-DVS.
Award	A grant or funding given or administered by the Michigan Department of Health and Human Services, Division of Victim Services to an authorized agency, organization, or subrecipient.
CFR	Code of Federal Regulations - The Code of Federal Regulations (CFR) is the official legal print publication containing the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government.
CFDA	Catalog of Federal Domestic Assistance - The CFDA is a Government-wide compendium of Federal programs, projects, services, and activities that provide assistance or benefits to a variety of recipients. The CFDA summarizes financial and nonfinancial assistance programs administered by departments and agencies of the Federal Government.
Competitive Request for Proposal (RFP)	A competitive process of issuing a public request for proposals with the intent that agencies will put together their best proposal and compete for a specific project. May also be referred to as an application, bid, and/or RFP.
Contract/Grant Agreement	A formal and legally binding agreement. May also be referred to as Grant or Grant Agreement.
Direct Service Staff	Staff, contractors, or volunteers who are providing grant allowable services/activities directly with clients.
Financial Status Report (FSR)	Financial Status Report. Submitted by Grantees monthly on EGrAMS and is used to request reimbursement for grant expenditures.
Fiscal Questionnaire	Fiscal self-report downloaded from Show Documents on EGrAMS and submitted by uploading to EGrAMS (Grantee > Grantee Office > Update Agency Addl. Info) annually by funded organizations.
Grant Agreement	The signed final agreement between MDHHS and a Government agency or organization authorized to accept funding. May be referred to as Contract or Award.
Grantee or Sub-Grantee	The agency or organization designated on the Award or Grant Subaward. Depending on the funding source, a

	Grantee may also include contractors, recipients, subrecipients or subgrantees.
ICHAT	Internet Criminal History Access Tool
Interagency Agreement	An Agreement between two or more State of Michigan entities.
Monitoring Plan	Annual plan outlining Quality Assurance and Monitoring Activities.
Monitoring Schedule	Five-year schedule ensuring that every Grantee receives a standards and/or programmatic contract review.
Pre-Award Risk Assessment	The pre-award risk assessment evaluates an organization's capacity to administer and implement federal funds.
Project	The implementation of a program through a grant agreement.
Risk Assessment	Annual evaluation of the risk of funding an organization and is used to inform the annual DVS monitoring plan.
Interagency Agreement	An Agreement between two or more State of Michigan entities.
Monitoring Plan	Annual plan outlining Quality Assurance and Monitoring Activities.
Monitoring Schedule	Five-year schedule ensuring that every Grantee receives a Quality Assurance Standards and/or Contract review.
Pre-Award Risk Assessment	The pre-award risk assessment evaluates an organization's capacity to administer and implement federal funds.
Project	The implementation of a program through a grant agreement.
Risk Assessment	Annual evaluation of the risk of funding an organization, and to inform the annual DVS monitoring plan.
Request for Proposal (RFP)	A solicitation released by the Department for competitive proposals or applications related to specific projects.
SAA	State Administering Agency – Term typically used in
UEID	Unique Entity ID
Organization Acronym	Definitions
BISC-MI	Batterer Intervention Standards Coalition-Michigan <a href="https://www.biscmi.org/">https://www.biscmi.org/</a>
CAC-MI	Child Advocacy Centers of Michigan <a href="https://cacmi.org/">https://cacmi.org/</a>
MCEDSV	Michigan Coalition to End Domestic and Sexual Violence <a href="https://mcedsv.org/">https://mcedsv.org/</a>
MCOLES	Michigan Commission on Law Enforcement Standards <a href="https://www.michigan.gov/mcoles">https://www.michigan.gov/mcoles</a>
MI-VAN	The Michigan Victim Assistance Academy <a href="https://mivan.org/">https://mivan.org/</a>
UTFAV	Uniting Three Fires Against Violence <a href="https://unitingthreefiresagainstviolence.org/">https://unitingthreefiresagainstviolence.org/</a>

<b>Federal Offices</b>	
<b>Organization Acronym</b>	<b>Definitions</b>
DOJ	United States Department of Justice
FVPSA	Family Violence Prevention and Services Act
OJP (Federal)	Office of Justice Programs
OVC (Federal)	Office for Victims of Crime – Office of Justice Programs
OVW (Federal)	Office on Violence Against Women – Department of Justice
VAWA	Violence Against Women Act
VOCA	Victims of Crime Act

<b>State Offices/Departments</b>	
<b>Organization Acronym</b>	<b>Definitions</b>
BGP	MDHHS Bureau of Grants and Purchasing
DVS	MDHHS Division of Victim Services
MCVSC (Commission)	Michigan Crime Victim Services Commission
MDHHS (Department)	Michigan Department of Health and Human Services
MDSVPTB (Board)	Michigan Domestic and Sexual Violence Prevention and Treatment Board

<b>State and Federal Computer Systems</b>	
<b>System</b>	<b>Definitions</b>
EGrAMS	Electronic Grants Administration and Management System
DVSGMS (IGX)	Division of Victim Services Grants Management System - Online reporting system for a variety of DVS grant agreements
OVC PMP/T	Office for Victims of Crime – Performance Measurement Platform/Tool
SAM	The System for Award Management (SAM) is the Official U.S. Government system that consolidated the capabilities of CCR/Fed Reg, ORCA, and EPLS.
SIGMA	Statewide Integrated Governmental Management Application - Payments Express State Payment System ( <a href="#">SIGMA Vendor Self Service Portal</a> )

<b>DVS Boards and Commissions</b>	
Crime Victim Services Commission	<a href="http://michigan.gov">Crime Victim Services Commission (michigan.gov)</a>
Human Trafficking Health Advisory Board	<a href="http://michigan.gov">Human Trafficking Health Advisory Board (michigan.gov)</a>
Michigan Domestic and Sexual Violence Prevention and Treatment Board	<a href="http://michigan.gov">Michigan Domestic and Sexual Violence Prevention and Treatment Board</a>
Sexual Assault Evidence Kit Tracking and Reporting Commission	<a href="http://michigan.gov">Sexual Assault Evidence Kit Tracking and Reporting Commission (michigan.gov)</a>

Who to Contact	
Type of question	Where to get help
Grant related questions (allowable costs, grant documents, etc.)	<a href="mailto:MDHHS-DVS@michigan.gov">MDHHS-DVS@michigan.gov</a>
EGrAMS questions (account set up and access, password reset, technical issues submitting grant applications/budgets, etc.)	517-335-3359 or MDHHS-EGrAMS-Help@michigan.gov
Desk Reviews, Contract and/or Standards Reviews	Tonya Avery, Director of Quality Assurance <a href="mailto:averyt2@michigan.gov">averyt2@michigan.gov</a>
DVSGMS (IGX) questions	<a href="mailto:MDHHS-DVS@michigan.gov">MDHHS-DVS@michigan.gov</a>
Budget modifications	<a href="mailto:MDHHS-DVS@michigan.gov">MDHHS-DVS@michigan.gov</a>
PMT access and reporting questions	<a href="mailto:MDHHS-DVS@michigan.gov">MDHHS-DVS@michigan.gov</a>
Confidentiality or PII Breach	<a href="mailto:MDHHS-DVS-DataBreach@michigan.gov">MDHHS-DVS-DataBreach@michigan.gov</a>

## Grant Administration

### Special Conditions

1. The Federal Special Conditions are material requirements of any DVS award that contains Federal funding.
2. Failure to comply with any one or more of the Special Conditions -- whether a condition set out in full below, a condition incorporated by reference, or a certification or assurance related to conduct during the award period -- may result in the withholding of award funds, disallowed costs, or suspension or termination of the award. OVW/OJP also may take other legal action as appropriate.
3. By accepting a DVS award that includes Federal Funding, Grantees agree to follow the applicable set(s) of terms and conditions that are available at <https://www.michigan.gov/mdhhs/safety-injury-prev/publicsafety/crimevictims/grants-and-funding/current-Grantees/terms-and-conditions>

## Organizational Administration

### Administrative Oversight

The Grantee shall provide administrative oversight according to the following guidelines:

- a. Assume full responsibility for the day-to-day management of the organization.
- b. Administer staff and volunteers in accordance with applicable professional, ethical, and legal principles.
- c. Account for and track funding expended as a part of each grant separately.
- d. Recruit a diverse staff that is reflective of the community, clients served, and geographic area the organization serves.

## State of Michigan Information Technology Security Requirements

The Grantee acknowledges compliance with State of Michigan Information Technology Information Security Policy\* and provides the following assurances:

1. The Grantee Project Director will be notified within 24 hours when its' users are terminated or transferred or immediately if after an unfriendly separation.
2. The Grantee Project Director will annually review and certify user accounts to verify the user's access is still required and the user is assigned the appropriate permissions.
3. The Grantee Project Director will remove user's access within 48 hours of notification when users are terminated or transferred, or immediately if after an unfriendly separation.

## DVS Required Notifications

### Changes in Leadership

Grantees must provide written notification to DVS at MDHHS-DVS@michigan.gov in the following situations within 10 days. Grantees are not required to inform DVS of direct service staff turnover, unless the staff in question are assigned as a project official in EGrAMS. Key staff changes must be made on the following systems:

Position	Requires Change in DMSGMS/IGX	Requires Change in EGrAMS
Executive Director	X	Only if also holding one of the key roles listed below
Authorized Official	X	X
Financial Officer	X	X
Project Director	X	X
Board President Name and Contact Information	X	

### Organizational Changes

Grantees must provide written notification to DVS at [MDHHS-DVS@michigan.gov](mailto:MDHHS-DVS@michigan.gov) in the event of the following organizational changes.

Type of change	Timeline for notification	Additional changes needed
Emergency interruption of services	24 hours (see section below)	
Planned interruption of services	30 days prior	
Facility and/or administration location changes	10 days	May require a grant amendment
Change in mailing address	10 days	May require a grant amendment and change on SIGMA
Change in contact information (phone number, email address, etc.)	10 days	Changes required on: EGrAMS DMSGMS

### Interruption of Services

Grantees must provide written notification to DVS of any planned interruption in service delivery, including a reduction in any required service available thirty (30) days prior to the reduction.

Grantees must provide written notification to DVS in the following situations within **24-hours**:

- Any known breach of confidentiality.
- Adverse media regarding the project.
- Suspected or confirmed fraud.

### Organizational Documents

Upload and keep the following documents up to date in DMSGMS (IGX):

- Board of Director’s list
- Organizational Chart (update as needed)
- Conflict of Interest

## Inspection Requirements

Annual health and safety inspections are required at every location in which DVS funded client services are physically being provided. Public/governmental buildings where shelter/residential services are not provided do not need a separate inspection (see chart below). Grantees must maintain a record of completion of inspections for locations where an inspection is required. Inspections are done locally by the county, township, or municipality. Types of inspections will vary by program type.

Type of Facility	Services being provided at location	Is a health and safety inspection required?
Governmental building (State, Tribal, municipal, etc.)	Counseling/therapy, supportive services	No
Governmental building (State, Tribal, municipal, etc.)	Shelter	Yes
Public buildings (restaurants, hospitals, etc.)	Counseling/therapy, supportive services	No
Non-Profit organization owned/rented facility	Shelter	Yes
Non-Profit organization owned/rented facility	Counseling/therapy, supportive services	Yes
TSH units	Shelter, housing, counseling/therapy, supportive services	Yes, HQS required annually

Type of Inspection	Mandatory	Recommended
HVAC (heating and cooling)	x	
Health and Safety including:		
<i>Fire</i>	x	
<i>Security</i>		x
<i>Elevators, if applicable</i>	x	
Water testing		x
Lead paint, if applicable*	x <i>Only needs to be done once and kept on file</i>	

\* Per Federal/State regulations - If the structure was built prior to 1978, and a child under the age of six or a pregnant woman will reside in the property, and the property has a defective paint surface inside or outside the structure, the property cannot be approved until the defective surface is repaired by at least scraping and painting the surface with two coats of non-lead-based paint. Defective paint surface means applicable surface on which paint is cracking, scaling, chipping, peeling or loose. If a child under age six residing in the property has an Elevated Blood Lead Level (as defined by the CDC), paint surfaces must be tested for lead-based paint.

Beginning October 1, 2024, HUD will transition all housing inspection standards to the National [Standards](#) for the Physical Inspection of Real Estate (NSPIRE) inspection model. This model is designed to reduce



health and safety hazards in homes. NSPIRE also aligns multiple HUD programs to a single set of inspection standards, ensuring consistent housing quality expectations across all housing programs. To prepare for this transition, HUD has made available free online NSPIRE training at [NSPIRE Online Inspector Training - HUD Exchange](#).

## Suspension or Debarment

An award recipient will be considered ineligible if any of the three following conditions exist:

1. Suspension and Debarment refers to organizations that have been suspended or debarred by the Federal government. To ensure that applicants have not been suspended or debarred, DVS staff will check the State of Michigan's Office [Debarment List](#) and United States Department of Labor, Office of Federal Contract Compliance Programs (OFCCP) list of debarred companies.
2. Subgrantee Annual Reports: Organizations that are currently delinquent in submission of reports to [MDHHS-AuditReports@michigan.gov](mailto:MDHHS-AuditReports@michigan.gov) for the preceding year are ineligible to receive new awards until the delinquent status has been resolved. DVS staff will check the status of subrecipient Annual reports on the MDHHS Testing for Major Programs [Internal Review site](#).
3. Single Audit Report-Organizations that are currently delinquent in the submission of a Single Audit report for any of the preceding three years, until the delinquent status has been resolved. DVS staff will monitor the status of single audits on the MDHHS Testing for Major Programs [Internal Review site](#).

Additionally, DVS grantees with subcontractors or subrecipients receiving more than \$25,000 in federal funds are responsible for ensuring that those subcontractors/subrecipients are not suspended or debarred from receiving federal funds. This may be accomplished by searching for the subcontractor/subrecipient on <http://SAM.gov>. [Documentation that this check has been conducted should be maintained by the grantee.](#)

## Licenses to Solicit and Operate

Many DVS grantees are private, not-for-profit agencies who are funded through a variety of sources including donations. In general, 501c3 nonprofit organizations are required to have a Charitable License to Solicit per the Charitable Organizations and Solicitations Act, [MCL 400.271](#) et seq.

## SAM Registration

The System for Award Management (SAM) is the repository database for certain standard information about federal financial assistance applicants, recipients, and subrecipients. Each assistance listing in SAM is associated with a unique five-digit CFDA (Catalog of Federal Domestic Assistance) number. SAM registration is FREE. Be wary of SAM-related scams. There is no charge for this process at any time.

All recipients must have a **Unique Entity ID (UEI)** when applying for Federal awards and cooperative agreements (initial or supplemental awards). A Unique Entity ID (SAM) is a 12-character

alphanumeric value that is managed, granted, and owned by the US government. This unique entity identifier is used for tracking purposes, and to validate address and point of contact information for applicants, recipients, and subrecipients.

The UEI requires an account with <http://SAM.gov>. DVS recommends that funding applicants register or renew registration with SAM as early as possible. A lapsed SAM registration could impact eligibility for funding.

- Organizations that do not have a UEI should create one at <http://SAM.gov>.
- There is no cost to use the SAM website.
- For questions and assistance, the Federal Service Desk can be contacted at 866-606-8220.
- Individuals who apply for grant awards or cooperative agreements from the Federal Government are exempt from this requirement.

### Further Resources

#### [GSA Unique Entity Identifier Update](#)

DOJ Financial Guide: [Pre-award Requirements – 2.1 Application Process](#)

#### [2 CFR 25: Universal Identifier and System of Award Management](#)

### Written Materials

In most cases, MDHHS-DVS does not authorize grant funding to be used to develop and/or disseminate written materials for public distribution (i.e., brochures, newsletters, billboards, ads, annual reports, etc.) except in cases where DVS has pre-approved the materials. In cases where written approval has been given for the development of written materials, the following attribution(s) and requirements will apply:

- Any public dissemination of information related to program activities funded through a DVS agreement shall identify the State of Michigan as the source of the funding for the services provided. This includes verbal interviews with media representatives.
- Grantees shall include recognition to the State of Michigan in any and all publications, papers and presentations arising from the program (including from sub grantors) herein by placing the following disclaimer on any and all publications, papers and presentations: *This project is supported by the (name the specific award), awarded by the State of Michigan and administered by the Michigan Department of Health and Human Services – Division of Victim Services. Points of view or opinions contained within this document do not necessarily represent the official position or policies of the State of Michigan or the MDHHS-DVS.*

### Release of Confidential Information

As a condition of receiving DVS funding, victim service programs are prohibited from disclosing, revealing, or releasing personally identifying information or information collection in connection with services utilized, requested, or denied unless: (1) the service participant has signed a release of information, (2) a law mandates disclosure, or (3) a court has ordered disclosure.

Release of information forms must:

- Be present for review when needed,
- Be dated and reasonably time limited,
- Be signed by client and staff,
- Identify specific information to be released and to whom,
- Contain a statement informing survivors that signing a release is voluntary.
- Be treated as unique to the individual victim and circumstances and cannot be presented or completed as a routine practice.

This provision does not apply to law enforcement and prosecution generated information necessary for law enforcement and prosecution purposes.

See also [Guidance for Implementation of the Federal Confidentiality Provisions for DVS Funded CACs](#) for information on applicability to CACs.

### Further Resources

VOCA: [28 CFR 94.115 Non-disclosure of confidential or private information](#)

VAWA: 34 USC §12291(b)(2) *Definitions and grant provisions – Grant conditions – Nondisclosure of confidential or private information*

VAWA: [28 CFR 90.4 Grant Conditions – Nondisclosure of confidential or private information](#)

FVPSA: 42 USC § 10406(5) *Formula grants to states – Grant conditions – Nondisclosure of confidential or private information.*

[FAQ on the VAWA Confidentiality Provision](#) (2017) – This resource applies to VOCA, VAWA, and FVPSA funding.

[NNEDV Confidentiality Toolkit](#)

[NNEDV Client Limited Release of Information Form](#)

## Freedom of Information Act (FOIA) Requests

The Michigan Freedom of Information Act (FOIA) provides all persons (except persons incarcerated in correctional facilities) with access to public records of public bodies. Requests to inspect or receive public records of MDHHS must be in writing and describe the requested records with sufficient detail to enable the Department to identify and locate the requested records. Some records are exempt from disclosure under the FOIA or another statute and thus will not be provided. DVS complies with the [MDHHS FOIA](#) request policies.

## Staff Administration

### Background Checks

The Grantee must have a written policy describing the criteria on which its determinations to hire shall be made in the event of positive background check findings and must document the basis for each

determination. The Grantee may consider the recency and type of crime when making a determination. Failure to comply with this provision may be cause for immediate cancellation of this Agreement. In addition, the Grantee must further have a clearly defined written policy regarding acceptable screening practices of new staff members and volunteers who have direct access to clients and/or client's personal information. These screening practices serve to protect the organization and its clients. The DVS must also assure that any subgrantees have both of these written policies.

If MDHHS determines that an individual provided services under this Agreement for any period prior to completion of the required checks as described in MDHHS contracts, MDHHS may require repayment of any and/or all billed services for the period that the required checks had not been completed.

### **E-verify (VOCA Special Conditions)**

Employment eligibility confirmation with E-Verify For purposes of satisfying the requirement of this condition regarding verification of employment eligibility, the recipient (or any subrecipient) may choose to participate in, and use, E-Verify ([www.e-verify.gov](http://www.e-verify.gov)), provided an appropriate person authorized to act on behalf of the recipient (or subrecipient) uses E-Verify (and follows the proper E-Verify procedures, including in the event of a "Tentative Nonconfirmation" or a "Final Nonconfirmation") to confirm employment eligibility for each hiring for a position in the United States that is or will be funded (in whole or in part) with award funds.

"United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands of the United States, and the Commonwealth of the Northern Mariana Islands.

Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law.

Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 U.S.C. 1324a(a)(1).

Questions about E-Verify should be directed to DHS. For more information about E-Verify visit the E-Verify website (<https://www.e-verify.gov/>) or email E-Verify at [E-Verify@dhs.gov](mailto:E-Verify@dhs.gov). E-Verify employer agents can email E-Verify at [EverifyEmployerAgent@dhs.gov](mailto:EverifyEmployerAgent@dhs.gov). Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

### **Non-Discrimination Notices for Employees and Program Participants**

Grantees must comply with federal laws and MDHHS contract provisions that prohibit discrimination on the basis of religion, race, color, national origin, age, sex, height, weight, marital status, disability, gender identification or expression, sexual orientation, partisan considerations, or genetic information. Additional forms of discrimination may be prohibited. Grantees should review the *DVS Program Discrimination Complaint Policies and Procedures* and *Employment Discrimination Complaint Policies and Procedures* for more information regarding federal laws prohibiting discrimination. These documents can be found [under Methods of Administration](#).

Grantees must provide written notification that they do not discriminate on the basis of the above categories. This written notification must be consistent with applicable federal and state laws, and they must be provided to program beneficiaries and employees as well as prospective program beneficiaries and employees.

For program beneficiaries, these notifications can be put on items such as posters, brochures, or other program materials.

For employees, they can be put on items such as posters, policies, or recruitment materials.

### Further Resources

MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*

[Federal Register :: Partnerships With Faith-Based and Other Neighborhood Organizations](#)

[U.S. Department of Justice, Office of Justice Programs: Civil Rights](#)

See webinar for applicable tribal exceptions [Office for Civil Rights — Training for Grantees | American Indians | Office of Justice Programs \(ojp.gov\)](#)

## **Retention Bonuses**

When allowable in the CFR retention bonuses may be paid to DVS grant funded staff provided that the following elements are met:

1. Retention bonuses are part of the Board approved policy that includes the following:
  - a. Retention bonus amount
  - b. Frequency of retention bonus(es)
  - c. Who is eligible and under what circumstances
  - d. How the amount/eligibility is determined
  - e. Recordkeeping procedures (must include timesheets, job descriptions and written compensation policies) Supplemental pay must also:
  - f. Reasonable and equitable distribution method (e.g. allocated to all related activities, including federal awards)
  - g. Reflected in written compensation policies
2. Bonus(es) are pro-rated and documentation maintained.
3. The retention bonus must be paid from the same grant(s) under which the salary is supported.
4. DVS grant funds may not used to support signing bonuses.

## **Overtime**

Unless exempted under the Fair Labor Standards Act, recipient and subrecipient employees should be compensated with overtime payments for work performed in excess of the established work week (usually 40 hours).

- Payment of more than occasional overtime is subject to periodic review by the awarding agency.
- In addition, overtime compensation is typically reviewed during site visits and audits.

**Position type and expected hours of work:** full time or part time, typical work hours and shifts, days of week, and whether overtime is expected.

Executive, administrative, and professional employees who meet the criteria for an exemption from the overtime requirements of the Fair Labor Standards Act may not be reimbursed for overtime under grants and cooperative agreements. Overtime charged to your grant(s) should be in line with your personnel policy.

### Further Resources

Department of Labor: [Overtime Pay](#)

DOJ Financial Guide: *Post award Requirements – Allowable Costs – [Overtime Compensation](#)*

## Organizational Chart Requirements

DVS funded organizations must have an organizational chart that contains the following components:

- Shows the overall structure and chain of command of the organization, including the reporting relationships for supervision.
- All paid positions of the organization including:
  - Position title that matches position descriptions,
  - Whether the position is full time or part time,
  - Name of individual(s) in the position or listed as “vacant” if the position is not filled,
  - Funding source,
  - Percentage of each funding source(s).
- Include DVS funded contractual staff, if applicable
- Job location
- Revision date

Organization charts must be uploaded on DVSGMS/IGX by clicking on your name in the upper right corner, choose Profile, Organization Uploads, and upload your Organization Chart in the Organization Chart field and click the Save button. Organizational charts should be updated whenever changes are made.

## Position Description Requirements

A job description for DVS- funded or partially funded position must contain the following components:

- **Job Title:** name of the position that is consistent with the organizational chart.
- **Classification:** exempt or nonexempt under the Fair Labor Standards Act (FLSA).
- **Essential Functions:** including how an individual is to perform them and the frequency with which the tasks are performed; the tasks must be part of the job function and truly necessary or required to perform the job. NOTE: Fundraising, including grant writing, is not an allowable cost.

If the position is funded 100% by any DVS grant, the position may not be used for fundraising (including grant writing) and may not be included on the position description.

NEW! The following components are *optional*:

- **Date:** date when the job description was written or last reviewed.
- **Preferred education and experience:** preferred education and experience based on requirements that are job-related and consistent with business necessity.
- **Competency:** knowledge, skills, and abilities.
- **Signature Line:** signatures should include the supervisor and the employee.
- **Job Location**
- **Work environment:** temperature, noise level, inside or outside, or other factors that will affect the person's working conditions while performing the job.
- **Salary/hourly range:** compensation levels, groups or pay ranges into which jobs of the same or similar worth are placed, including minimum and maximum pay bands.
- **Supervisor:** title of the position this job reports to.
- **Physical demands:** including bending, sitting, lifting, and driving.
- **Disclaimer:** a statement that indicates that the job description is not designed to cover or contain a comprehensive listing of activities, duties or responsibilities that are required of the employee. Duties, responsibilities, and activities may change, or new ones may be assigned at any time with or without notice.
- **Affirmative action plan/equal employment opportunity (AAP/EEO) statement:** clause(s) that outlines federal contractor requirements and practices and/or equal employer opportunity statement.
- **Summary/objective**
- **Travel:** percentage of travel time expected for the position, where the travel occurs, such as locally or in specific countries or states, and whether the travel is overnight.

Position descriptions will be reviewed during monitoring visits.

## Grant Policy Requirements

### Driving Safety Policies

Grantees must follow both state and federal applicable driving-related safety requirements and laws while driving any vehicle during the course of performing work funded by DVS awards, including wearing seat belts and prohibiting texting while driving. These requirements must be reflected in organizational policies.

### Confidentiality Policy

All DVS/Grantees/ or contractors must have Confidentiality Policy/Policies. Grantees receiving VOCA, FVPSA, or VAWA funding must implement policies compliant with 28 CFR § 95.115 (VOCA); 34 USC § 12291(b)(2) (VAWA); 42 USC § 10401 (FVPSA).

Further Resources:

- MDHHS Grant Agreement: *General Provisions – Non-Disclosure of Confidential Information*
- VOCA: 28 CFR § 94.115 Non-disclosure of confidential or private information

- VAWA: 34 USC §12291(b)(2) Definitions and grant provisions – Grant conditions – Nondisclosure of confidential or private information
- VAWA: 28 CFR 90.4 Grant Conditions – Nondisclosure of confidential or private information
- FVPSA: 42 USC § 10406(5) Formula grants to states – Grant conditions – Nondisclosure of confidential or private information.
- DOJ: FAQ on the VAWA Confidentiality Provision (2017)
- NNEDV: Confidentiality Toolkit
- Confidentiality Policy Considerations and Recommendations: A Resource Manual for Michigan Domestic and Sexual Violence Programs see [Confidentiality-Manual-Update-2018.pdf \(mcedsv.org\)](#), published by Michigan Coalition to End Domestic and Sexual Violence, 2018.

## Personally Identifiable Information (PII) Breach Policy

All DVS Grantees/or contractors who are subject to confidentiality requirements and who create, collect, use, process, store, maintain, disseminate, disclose, or dispose of personally identifiable information must have written policies and procedures in place to:

1. Respond in the event of actual or imminent breach of personally identifiable information, and
2. Notify DVS by sending an email to [MDHHS-DVS-DataBreach@michigan.gov](mailto:MDHHS-DVS-DataBreach@michigan.gov) within 24 hours of discovery of the breach or discovery of conditions that will likely lead to a future data breach.

E-mail notice should include:

- a. Date of the breach/or discovery of the breach
- b. Nature/type of PII involved
- c. Victim(s) impacted including number and type (e.g., 7 adult DV victims participating in support group, one individual receiving counseling services)
- d. Scope of breach (who received or had access to unauthorized PII)
- e. Mitigation measures

## Personally Identifiable Information (PII) Breach Policy Definitions

### Personally Identifiable Information (PII):

PII means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, public Web sites, and university listings. This type of information is considered public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.

### Incident:

An occurrence that (1) actually or imminently jeopardizes, without lawful authority, the integrity, confidentiality, or availability of information or an information system; or (2) constitutes a violation or imminent threat of violation of law, security policies, security procedures, or acceptable use policies.



## **Breach:**

The loss of control, compromise, authorized disclosure, unauthorized acquisition, or any similar occurrence where (1) a person other than an authorized user access or potentially accesses personally identifiable information or (2) an authorized user accesses or potentially accesses personally identifiable information for unauthorized purposes.

A breach is not limited to an occurrence where a person other than an authorized user potentially accesses PII by means of a network intrusion, a targeted attack that exploits websites vulnerabilities, or an attack executed through an email message or attachment. A breach may also include the loss or theft of physical documents that include PII and portable electronic storage media that store PII, that inadvertent disclosure of PII on a public website, or an oral disclosure of PII to a person who is not authorized to receive that information. It may also include an authorized user accessing PII for an unauthorized purpose. Often an occurrence may be first identified as an incident, but later identified as a breach once it is determined that the incident involves PII, as is often the case with a lost or stolen laptop. Ensure that your program's policies and procedures include notifying DVS using the DVS Data Breach email address within 24 hours of discovery of the breach or discovery of conditions that will likely lead to a future data breach.

Some common examples of a breach include:

- Submitting data that includes PII to MDHHS, DVS, or other grant administering agency.
- A laptop or portable storage device storing PII is lost or stolen.
- An email containing PII is inadvertently sent to the wrong person.
- A box of documents with PII is lost or stolen during shipping.
- An unauthorized third party overhears agency employees discussing PII about an individual seeking employment or Federal benefits.
- A user with authorized access to PII sells it for personal gain or disseminates it to embarrass an individual.
- An IT system that maintains PII is accessed by a malicious actor.
- PII that should not be widely disseminated is posted inadvertently on a public website; or
- Any other disclosure of PII by victim services Grantees which is inconsistent with federal victim services confidentiality provisions found in the Victims' of Crime Act (VOCA) (28 CFR 94.115), the Violence Against Women Act (VAWA)(34 USC §12291(b)(2); 28 CFR 90.4), or the Family Violence Prevention and Services Act (FVPSA) (42 USC § 10406(c)(5).

## Further Resources

2 CFR 200.79: [Personally Identifiable Information \(PII\)](#).

[OMB M 17-12: Preparing for and Responding to a Breach of Personally Identifiable Information](#)

Data Breaches & Victim Service Providers: Considerations for Developing Effective Policies:

<https://www.techsafety.org/data-breach-response-policies>

Data Breaches & Victim Service Providers: Considerations for Developing Effective Policies Data Security Checklist to Increase Victim Safety & Privacy:

[https://www.techsafety.org/s/NNEDV\\_DataSecurity\\_English08\\_access-amdl.pdf](https://www.techsafety.org/s/NNEDV_DataSecurity_English08_access-amdl.pdf)

Preparing for and Responding to a Breach of Personally Identifiable Information, United States Office of Management and Budget, OMB M-17-12: [MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES \(archives.gov\)](https://www.archives.gov/omb/memoranda-for-heads-of-executive-departments-and-agencies)

Recording: Data Breach Notifications & Survivor Confidentiality:  
[https://www.youtube.com/watch?feature=youtu.be&v=6W\\_cjp\\_xcXM](https://www.youtube.com/watch?feature=youtu.be&v=6W_cjp_xcXM)

<https://www.ovcttac.gov/taskforceguide/eguide/3-operating-a-task-force/32-information-sharing/maintaining-confidentiality/>

## Sexual Assault Track Kit Policy

All DVS funded Grantees providing services to victims/survivors of sexual assault are required to fully implement the use of Track-Kit™. Contact [MSP\\_SAEK@Michigan.gov](mailto:MSP_SAEK@Michigan.gov) for more information on registering your agency in Track-Kit™.

## Sexual Misconduct and Domestic/Dating Violence Policy

All DVS funded Grantees are required to have a policy in place to address workplace-related incidents of sexual misconduct, domestic violence and dating violence involving an employee, volunteer, consultant, or contractor. This is a special condition that is required by the Office of Violence Against Women (OVW). DVS is extending this condition by policy to VOCA funded Grantees for consistency across victim service providers and in anticipation of similar OVC expansion.

### The policy must address the following:

1. Allegations of workplace-related incidents of sexual misconduct, domestic violence, and dating violence by an employee, volunteer, consultant, or contractor;
2. Workplace supports for employees, volunteers, consultants, or contractors who are victims of sexual misconduct, domestic violence, or dating violence; and
3. Adjudications that will result in an employee, volunteer, contractor, or consultant being prohibited from occupying positions that could undermine the ability of the recipient or subrecipient [Grantee] to carry out the grant-funded project, such as positions working with victims and other vulnerable populations. A policy may provide that certain adjudications do not prohibit an individual from occupying such a position but must include standards for granting such an exemption for an individual.

## Sexual Misconduct and Domestic/Dating Violence Policy Definitions

### Adjudication:

Includes a conviction, issuance of a final protection order, court-ordered diversion, or other judicial finding that the employee, volunteer, consultant, or contractor has engaged in domestic violence, dating violence, sexual assault, or stalking. The recipient may choose to include additional, related offenses, such as sex trafficking, as “adjudications.”

### Domestic violence, dating violence, sexual assault, and stalking:

Have the meanings given in [34 U.S.C. § 12291\(a\)](https://www.uscourts.gov/uscourt/cases/34-12291).

**Sexual misconduct:**

Means sexual assault, stalking, and sexual harassment.

**Sexual harassment:**

Means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment, whether such activity is carried out by a supervisor or by a co-worker, volunteer, or contractor.

An individual is considered to be in the "workplace" of the recipient or subrecipient [Grantee] while in, or using the resources of, the recipient's or subrecipient [Grantee]'s offices or facilities, using its equipment or vehicles, engaging in approved telework, on work-related travel, or otherwise conducting business on behalf of the recipient or subrecipient [Grantee]. The availability and nature of the response to a workplace-related incident may depend on the location at issue.

**Workplace-related incidents of sexual misconduct, domestic violence, and dating violence:**

Include acts, attempted acts, or threatened acts by or against employees, consultants, volunteers, or contractors, that occur in the workplace or that occur outside the workplace but have an impact on the workplace or otherwise undermine the ability of the recipient or subrecipient [Grantee] to carry out the grant-funded project.

**Further Resources****[34 U.S.C. § 12291\(a\) Definitions and grant provisions](#)**

MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*

Award Condition: Policy Scope and Details: <https://www.justice.gov/ovw/page/file/1295756/download>

Communication from Laura L. Rogers, Past Deputy Director, Office on Violence Against Women: <https://www.justice.gov/ovw/blog/sexual-harassment-policies-now-required-all-ovw-Grantees>

Webinar, September 24, 2020: Preparing for OVW's Special Condition on Workplace-Related Sexual Misconduct and Domestic/Dating Violence: [Preparing for the OVW Special Condition on Workplace-Related Sexual Misconduct and Domestic/Dating Violence](#)

[Elliott-Larsen Civil Rights Act](#)

**Suitability of Working with Minors Policy**

DVS Grantees or contractors who receive DVS funding are required to have an updated policy and processes in place regarding the determination of suitability required for certain individuals who may interact with minors.

## Requirements, Advanced Determination of Suitability:

Grantees/contractors may not permit covered individuals to interact with minors in the course of activities under the award without first making a written determination of the suitability of that individual to interact with minors based upon current and appropriate information (background checks), detailed in provision A below, and taking into account the certain factors and considerations, detailed in provision B below.

- A. Current and appropriate information (background checks) must be completed no earlier than six (6) months before the determination regarding suitability:
- Sex offender
    - [Dru Sjodin National Sex Offender Public Website](#)
    - [Michigan Public Sex Offender Registry](#)
    - Sex offender public website or registry for each state (and/or tribe) in which the individual lives, works, or goes to school or has lived, worked, or gone to school at any time during the past five (5) years
  - Child abuse
    - Central Registry Check
    - Child abuse registry in any state in which the individual lives, works, or goes to school or has lived, worked, or gone to school at any time during the past five (5) years
  - Criminal history
    - [ICHAT](#)
    - A fingerprint search for pertinent state(s) (or if the recipient or subrecipient documents that a fingerprint search is not legally available, a name-based search, using current and, if applicable, previous names and aliases)
      - Note: Pursuant to federal law, access to fingerprint based CHRI is limited to governmental agencies authorized by state or federal law and approved by the U.S. Attorney General to receive CHRI directly. Most nongovernmental agency, i.e., non-profits, are not considered an “authorized recipient” of CHRI in the state of Michigan. Although you could be considered a qualified entity for the receipt of CHRI as defined in the National Child Protection Act/Volunteers for Children Act (NCPA/VCA), the State of Michigan does not currently have specific legislation established by state statute or regulation to utilize the NCPA/VCA authority for most non-governmental organizations. Use the following link to [register as an Agency in the ICHAT system](#). For questions or assistance, please contact the ICHAT Help Desk at 517-241-0606 or via MSPCRD-ICHATHelp@Michigan.gov.
    - Criminal history registry for any state in which the individual lives, works, or goes to school or has lived, worked, or gone to school at any time during the past five (5) years
- B. Minimum factors and considerations in determinations regarding suitability:
- Federal, state, tribal, or local law;
  - Recipient’s (or subrecipient’s) written policies and procedures; and
  - Background checks.

- C. The Grantee/contractor may not determine that an individual is suitable to interact with minors in the course of activities under the award if the individual:
- Withholds consent to a criminal history search required by this condition;
  - Knowingly makes (or made) a false statement that affects, or is intended to affect, any search required by this condition;
  - Is listed as a registered sex offender on the Dru Sjodin National Sex Offender Public Website;
  - To the knowledge of the Grantee/contractor, has been convicted – whether as a felony or misdemeanor – under federal, state, tribal, or local law of any of the following crimes (or any substantially equivalent criminal offense, regardless of the specific words by which it may be identified in law):
    - sexual or physical abuse, neglect, or endangerment of an individual under the age of 18 at the time of the offense;
    - rape/sexual assault, including conspiracy to commit rape/sexual assault;
    - sexual exploitation, such as through child pornography or sex trafficking;
    - kidnapping;
    - voyeurism; or
  - Is determined by a federal, state, tribal, or local government agency not to be suitable.

*Updates and Reexamination:* Grantees/contractors must update the background check searches described above at least every five years and reexamine the covered individual's suitability determination in light of those search results.

*Frequency:* Minimum updated searches at least every five years.

*Questions regarding Suitability:* Grantees/contractors may contact their contract analyst at DVS with any questions regarding the requirements of this condition and must not allow a covered individual to interact with a participating minor until such questions are answered.

## **Suitability of Working with Minors Definitions**

### **Covered individual:**

Any individual (other than a participating minor, as defined in this condition, or a client of the Grantee/contractor who is expected, or reasonably likely, to interact with any participating minor (other than the individual's own minor children). A covered individual need not have any particular employment status or legal relationship with the Grantee/contractor. Such an individual might be an employee of Grantee/contractor, but also might be (for example) a consultant, contractor, employee of a contractor, trainee, volunteer, or teacher.

### **Participating minor:**

All individuals under 18 years of age within the set of individuals described in the scope section of this condition as it appears on the award document are participating minors.

### **Interaction:**

Physical contact, oral and written communication, and the transmission of images and sound, and may be in person or by electronic (or similar) means. This definition does not include:

- Brief contact that is both unexpected by the Grantee/contractor and unintentional on the part of the covered individual – such as might occur when a postal carrier delivers mail to an administrative office.

- Personally-accompanied contact – that is, infrequent or occasional contact (for example, by someone who comes to make a presentation) in the presence of an accompanying adult, pursuant to written policies and procedures of the Grantee/contractor that are designed to ensure that – throughout the contact – an appropriate adult who has been determined to be suitable pursuant to this condition will closely and personally accompany, and remain continuously within view and earshot of, the covered individual.
- *Activities under the award*: Whether paid for with federal funds from the award, “matching” funds included in the approved budget for the award, or “program income” for the award as defined by the (DOJ) Part 200 Uniform Requirements), activities under the award include both:
  - Activities carried out under the award by the Grantee/contractor; and
  - Actions taken by an entity or individual pursuant to a procurement contract.

Further Resources

OJP: <https://www.ojp.gov/funding/explore/interact-minors>

OVW: <https://www.justice.gov/ovw/page/file/1202141/download>

## Conflict-of-Interest Policies

All Grantees must also develop policies and procedures to address conflicts/potential conflicts of interest within the organization. The policies and procedures do not need to be stand alone, and instead can be part of other policies. These policies may already exist within your organization. The following areas should be addressed in policy and available upon request:

- Policy to implement general procurement standards covering conflicts of interest as outlined in CFR 200.318.
- The process used to determine services, receipt of in-kind donations, and allocation of client assistance and/or financial benefits.
- Hiring and/or supervising staff, volunteers and/or interns.
- Policy to address Board member conflicts and decision making.

Except for Tribes, funded programs and/or organizations are required to have a process, procedure and/or policy to document familial relationships between Board, staff, and interns, as well as any other relationships that reasonably raises concerns about favoritism, bias, ethics or conflict of interest. Familial relationships are those relationships where persons are related by blood or affinity to the fourth degree, including step relationships. Grantees must complete the Conflict-of-Interest Policy and Disclosure Form on DMSGMS (IGX).

Notification to DVS must be made by non-Tribal Grantees as follows:

1. Using the DVS Grantee Conflict of Interest Disclosure Form on DMSGMS/IGX
2. No more than 30 days after the relationship is discovered.
3. Only once during the individual's tenure with the organization unless the staff, board/leadership member, or volunteer's position changes. (Note: if the position changes, disclosure is required no more than 30 days after the change).

## Further Resources

DOJ Financial Guide: *Post award Requirements – Grant Fraud, Waste, and Abuse – Conflicts of [Interest](#)*

[2 CFR § 200.112 Conflict of interest](#)

## Training Requirements

### Grant Administrators

At a minimum, Grantees are required to identify a Civil Rights contact who must complete the training on federal civil rights laws and non-discrimination provisions of DOJ implementing regulations once per grant period. The training can be found on the [OJP Office of Civil Rights' website](#).

The required trainings are listed below:

- [Overview of the Office for Civil Rights and Laws Enforced](#)
- [Service to LEP Persons](#)
- [Faith-Based Organizations \(if applicable\)](#)
- [American Indians \(if applicable\)](#)
- [Standard Assurances](#) .

### Direct Service Staff

DVS grant-funded direct service staff must have access to ongoing professional development and skills training opportunities. It is recommended that each DVS grant-funded staff participate in a minimum of 16 hours of training each year. Grantees should maintain a record of all trainings completed by DVS funded staff and be prepared to provide this record upon request. DVS may also request to review training records as a part of Standards or Contract Reviews.

DVS allows Grantees to reimburse training and travel costs to attend in-state, out-of-state, and web-based trainings for any of the following:

- Staff funded through the grant program,
- VOCA and/or STOP grant match-funded staff, and
- Community partners (i.e., SART or MDT members).

### Required Pre-Service Training

The Grantee shall assure that appropriately credentialed or trained staff/volunteers under its control, (employees, volunteers and/or contractors, including those used as match), shall perform functions under their Grant Agreement that includes training in the crime victim area to be served under this Agreement. The specific training required depends on the type of service(s) provided by the agency.

### Training Requirements

1. The Grantee shall document and follow acceptable practices for the orientation, development and basic introductory training of staff and volunteers.

2. Training content must be compatible with the Division of Victim Services (DVS) Guiding Statement and be provided to those individuals providing services under their Grant Agreement.
3. New staff must be fully trained before providing services.

### **Mandatory Trainings**

The following trainings must be completed within the first six months for each newly hired direct service employee funded through DVS.

1. **Staff, contractors, volunteers with access to client information-**
  - *Confidentiality webinar series*, hosted on Michigan Victim Advocacy Network (MiVAN).
2. **Staff, contractors, volunteer providing direct client services-**
  - *Crime Victims Services Compensation 2023 webinar*, hosted on MiVAN. Or volunteer abbreviated alternative <https://www.michigan.gov/mdhhs/safety-injury-prev/publicsafety/crimevictims/crime-victim-compensation/applying-for-compensation>.
  - *Understanding The Confidentiality Requirements Of VOCA, FVPSA, And VAWA (2023) webinar series*, hosted on Michigan Victim Advocacy Network (MiVAN).
3. **New Service Provider Training** (administered by Michigan Coalition to End Domestic & Sexual Violence) OR equivalent must meet DVS Quality Assurance Standards, Section D – Staff and Volunteer Management – Standard D24 Foundational and must be approved by DVS. Training is required for domestic violence/sexual assault programs funded through:
  - a. Culturally Specific/Underserved (CSU),
  - b. Culturally Specific/Responsive Underserved VOCA (CSRUV),
  - c. Domestic Violence (DV),
  - d. Sexual Assault Comprehensive Services (SACS)/Sexual Assault Focused Services,,
  - e. Transitional Supportive Housing (TSH)/Transitional Supportive Housing VOCA (TSHV) grants.
  - f. \*For domestic violence/sexual assault programs funded through CSU, DV, SACS/SAFS, TSH/TSHV, STOPV.
4. **National Children’s Alliance (NCA)** - Accredited Child Advocacy Centers funded through Children’s Advocacy Centers (CAC/CACS/CACV).
5. **Victim Assistance Training Online** (provided by OVC Training & Technical Assistance Center (TTAC))- All staff funded through a DVS Grant not previously listed.
  - a. Basics
  - b. Core Competencies and Skills
  - c. Crimes (for crime types that are relevant to services provided under each applicable grant programs
  - d. Specific Considerations for Providing Victim Services



6. **Grant-specific training(s)** may also apply.

### In-State Trainings

Grantees who include travel and training costs in an approved budget are not required to receive prior authorization for in-state trainings from DVS. In-state and web-based training costs that fall within the deviation allowance for the travel and training line items are not subject to additional limits on the number of individuals who can expense travel and training costs per grant.

### Out-of-State Trainings

Are allowable under the following conditions:

- Maximum of two staff may be reimbursed for in-person training registration for each grant agreement per fiscal year.
- International training (training outside the United States) and training outside the Continental United States is not allowable.
- Training must be a reasonable expense, consistent with the grant program under which the staff person’s salary is supported and must be applicable to their responsibilities.

### Approval Process

An Out-of-State Travel Request form must be submitted (the Out of State Travel tab on Budget Revision Request Form) if neither of the following applies.

1. Out of state conference and location is specifically identified and costs included in the organization’s approved budget. **OR**
2. Training is not included on the pre-approved list.

	In-State Trainings	In-Person Out-of-State Trainings	Web-based Trainings
DVS Authorization Required	No	Yes – see restrictions above	No
2-attendee per grant limit	No	Yes	No
Must be applicable to grant service/program area	Yes	Yes	Yes

## Grant Requirements and Services

### Funding Availability

#### Non-Competitive Agreements:

DVS awards non-competitive state grant programs or federal formula grants, whose purposes have been mandated by the Michigan legislature or the United States Congress. There are times when making non-competitive awards is necessary and in the public interest or only one responsible applicant can perform

the work of the proposed project. DVS determines the victim service programs eligible for non-competitive agreements.

Two types of non-competitive applications include:

- ***Solicited Applications:***  
This application process is for a subset of Grantees/programs that offer targeted services to victims of crime. In some cases, a solicited application will be released annually, or may be released every 3-5 years as determined by Department and funding source requirements. The following agreement types/funding sources may issue solicited (noncompetitive) applications:
  - Inter-Agency Agreements
  - Victims of Crime Act (VOCA) Non-Competitive subaward funds for Tribal Victim Services (TRBVS) for Federally Recognized Tribal Victim Service Programs.
  - State-administered Victim Rights Grants
  - Child Advocacy Centers state funding; and
  - Special Project Victim Service Programs includes special projects such as hotlines, Violence Against Women Act (VAWA) STOP Courts (STOPC) grants, emergency grants in response to mass violence incidents, including the Anti-Terrorism and Emergency Assistance Program, or other Legislative funding priorities.
  
- ***Allocated Applications***  
Grantees funded through MDHHS-DVS may be eligible to complete an annual allocated DVS Grant Application. The application process for these approved Grantees determines how much funding will be allocated in the next funding cycle.  
Grantees eligible for the allocated DVS grant process are asked to complete an annual application including a work plan and budget, which will be reviewed by MDHHS-DVS staff based on compliance with Federal and/or State program guidelines; completeness and clarity; scope of the program; allowable agreement expenditures; and cost effectiveness. Allocated applications should remain within the scope of the original, competitive application that was submitted and approved by DVS.  
For certain formula grants, such as the State-administered Victim Rights grants, allocations are mandated by the Michigan Legislature and determined through associated legislation.

### **Competitive Agreements:**

Based on Federal Awards and allocations and/or State-identified funding priorities, DVS must determine the amount of funding allocated to currently funded programs under DVS, and grant funds available via open, competitive Request for Proposals (RFPs). Competitive grants are awarded for a grant period of three to five years, except for legislatively determined grants.

- ***Initial Competitive Request for Proposals:*** For open, competitive grant solicitations, DVS will issue RFPs. Notices outlining current grant opportunities are available on the EGrAMS website. RFP notices will include the Application, Application Instructions, Pre-Award Risk Assessment, and DVS Guidelines.

As a part of the competitive RFP, applicants will be required to complete and submit a pre-award risk assessment. Applicants may be required to pass the risk assessment to be considered for funding. The

RFPs will provide guidance to applicants, outline the criteria and process from which the proposals will be evaluated and the contractual terms that will govern the relationship between the State of Michigan and the award recipients.

DVS staff will review and evaluate open RFP applications based on current MDHHS and BGP policies.



If awarded funding, successful applicants re-submit the final application with any required changes. Once a completed application package is submitted by the subrecipient, the DVS risk assessment is completed to determine whether the subrecipient is in the low-, medium-, or high-risk category. Budgets will be reviewed for accuracy and to ensure that expenditures are within the guidelines of the state and federal requirements. The application is reviewed by DVS Contracts staff for approval. Once approved, the Standard Grant Agreement will be issued and signed by the Authorized Official and sent to the subrecipient via EGrAMS. Please see the EGrAMS help page and refer to RFP documents for more information about grant official roles.

Federal allocations awarded to the State of Michigan determine how much funding will be available for some DVS grants each year. DVS uses available data and creates a strategic plan to identify the most effective method of distributing grant funds, with an emphasis on the priority service areas identified by the funding sources and needs identified throughout the state. DVS places a high priority on transparent, fair, and open competitive processes guided by rigorous peer review.

## Grant Agreement

### Accessing a DVS Grant Agreement/Contract

To access your DVS Contract, [log into EGrAMS](#).

- Once logged in, go to *Grantee -> Project Director-> Application Status*.
- If it has not prepopulated, use the lookup  button to select the Grant Program (a small button with three dots).
- Click *Find*  in the bottom right-hand corner.
- The *View Contract* button above the Find button will give you a PDF version.

If you would like to save/print your contract, open the PDF using the instructions above.

### Accessing the Attachments to your DVS Contract(s)

You can access the attachments to your DVS contract(s) in one of two ways:

1. The links to the attachments are at the bottom of your contract, which you can access by following the instructions above; or
2. Without logging into EGrAMS:
  - a. Go to the [EGrAMS page](#),
  - b. Under Current Grants, select either *Bureau of Community Service* or *Legal and Policy Affairs*,
  - c. Select your grant program under the *Program* column,
  - d. In the pop-up, go to the *Documents* tab,
  - e. The attachments and Fiscal Review Questionnaire will show on this page.

## Attachments

MDHHS grant agreements may include any of the following attachments. Documents are dependent on the specific grant series.

### Application-Generated Attachments

The following attachments to your grant agreement are generated by the information that is entered in the Grantee's application:

- Attachment A Statement of Work (work plan)
- Attachment B.1 Program Budget Summary
- Attachment B.2 Cost Detail Schedule
- Attachment B.3 Equipment Inventory Schedule (*for organizations that purchase equipment over \$5,000*)
- Attachment B.4 De Minimis Indirect Cost up to 15% De Minimis Rate Calculation Form (*for organizations that use De Minimis rates*).

**NOTE: The DeMinimis rate increased from 10% to 15% effective 10-1-2024**

- Attachment C Performance / Progress Report Requirements
- Attachment E Program Specific Requirements
  - Expectation of Inclusion
  - Client Records
  - Credentials
  - Program Administration and Service Delivery
  - Criminal Background Check Written Policy
  - Inclusivity of Services
  - Audit Requirements
  - Client Confidentiality
  - Assisting victims with applying for compensation benefits
  - Special Conditions
  - Client Eligibility Criteria
  - Grant Funded Activities
- Attachment F Federal Funding Accountability and Transparency Act (FFATA) Reporting  
The FFATA Executive Compensation report must be completed and uploaded to the EGrAMS agency profile if:
  - The Grantee's federal revenue was 80% or more of the Grantee's annual gross revenue; AND
  - Grantee's gross revenue from federal awards was \$25,000,000 or more; AND
  - The public does not have access to the information about executive officers' compensation through periodic reports filed under Section 13(a) or 15 (d) of the Securities Exchange Act of 1934 or Section 6104 of the Internal Revenue Code of 1986.
  - The FFATA Executive Compensation report template can be found in EGrAMS documents.

## Services

### Free Provision of Services

All services provided in DVS contracts will be provided free of charge, regardless of client ability to pay for services rendered or the availability of insurance or other third-party payment resources. Grantees must provide services to crime victims, at no charge, through the DVS funded project. No income eligibility standards will be imposed on individuals receiving assistance or services supported by DVS grant funds. The Grantee is prohibited from charging a crime victim or third-party payer for any services supported with DVS grant funds.

\* Exceptions apply under the Transitional Supportive Housing (TSH) grant agreement.

### Further Resources

28 CFR 94.117(a): *Cost of Services* - [28 CFR 94.117 - Cost of services; sub-recipient program income. \(govregs.com\)](#)

### Client Assistance

Client Assistance is used to provide those services which respond to the immediate emotional and physical needs of victims (excluding medical care). Direct cash payments to clients are unallowable. All client assistance expenditures must be supported by receipts. If these items are charged to your grant(s), your agency will need a policy to support the charges.

Costs under Client Assistance include gift cards for the purchase of food, gas, clothing, toiletries, short-term alternative housing, changing windows and/or locks, taxis/transportation, prophylactic and nonprophylactic medications, and durable medical equipment. Relocation Assistance is also a form of Client Assistance.

Depending on the funding source or grant, Client Assistance may be allowable only in cases of emergency and must be directly related to the victimization (see the Allowable Cost chart for more details). Grantees intending to utilize client assistance under these grants should strategically plan for how to continue providing client assistance once the emergency phase has passed. Additionally, depending on the availability of DVS funding, allowability of certain costs may change.

### VOCA Funded Grants only

Client Assistance must be related to the victimization.

- **Allowable Client Assistance Expenses (excluding medical care)- 28 CFR 94.119**  
(a) provides a list of allowable expenses for “[i]mmediate emotional, psychological, and physical health and safety” needs other than medical care (see #3 below for medical care). These must be directly related to the victimization.

*Additional guidance in determining “directly related to the victimization”-*

For an expense to be covered it must be directly related to the victimization. One way to look at this would be utilizing a “but for” test. Think to yourself if “but for” the victimization, this expense would not have been required, or in other words that because of the victimization, this expense is now needed. Examples include the victim’s clothes being kept or destroyed by a

perpetrator, or a victim's personal hygiene items being kept or destroyed by a perpetrator, or a window, door, or lock that was broken by a perpetrator during an altercation.

**Allowable expenses for medical care under 28 CFR 94.119(a)(9)** - Medications and durable medical equipment are allowable on an emergency basis (i.e., when the state compensation program, the victim's health insurance plan, Medicaid, or another healthcare funding source is not reasonably expected to be available quickly enough to meet the emergency needs of a victim). This provision only applies to non-prescription and prescription medicine, prophylactic or other treatment to prevent HIV/AIDS infection or other infectious disease, durable medical equipment (such as wheelchairs, crutches, hearing aids, eyeglasses), and other healthcare items. Expenses are only allowable for emergency needs (typically within 48 hours of the victimization) and must not be covered by any other insurance or funding. These expenses must also arise from the victimization.

#### *Additional guidance in determining eligibility*

For example, if a child's glasses were left at the perpetrators home and now need to be replaced, or if they were broken by the perpetrator during the victimization, then this would be allowable. However, if after staying in a shelter for a period of time, the child breaks their glasses, this would not be allowable as there is no direct relation to the victimization, as the child glasses could have been broken regardless of where they were living.

#### Further Resources

Office for Victims of Crime: [VOCApedia](#)

VOCA: [28 CFR § 94.119\(l\) Allowable direct service costs](#)

VAWA: [Frequently Asked Questions \(FAQs\) About STOP Formula Grants](#), 2017.

FVPSA: <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75>

### **Crime Victims Compensation Program Requirements**

All recipients of DVS funding are required to assist crime victims/survivors in seeking and applying for [Crime Victim Compensation \(michigan.gov\)](#) benefits. Grantees must:

- Maintain a supply of crime victim compensation brochures and applications;
- Establish policies and procedures to identify clients who may be eligible for crime victim compensation benefits;
- Ensure staff are familiar with the crime victim compensation program, provide assistance to clients in filling out applications, and assist with checking on claim status.

In addition to the required Crime Victim Compensation trainings on MiVAN, the DVS Crime Victims Compensation Program can provide trainings to providers upon request. Their contact information is as follows:

- Phone: 517-241-7373, Victims only tollfree line 1-877-251-7373  
Email Address: [MDHHS-michigancrimevictim@michigan.gov](mailto:MDHHS-michigancrimevictim@michigan.gov)

For more information: [Crime Victim Compensation \(michigan.gov\)](https://www.michigan.gov/cvcs)

### Services to Incarcerated Victims

- **Individual and group counseling and advocacy** (excluding legal services/representation) may be provided to incarcerated (confined in prison or jail) individuals to address needs arising out of victimization experienced by the incarcerated individuals while incarcerated or at other points in their youth and adult lives. Funds may not support prison costs, such as prison guard salaries or administrative expenses.
- **Sexual Assault Medical Forensic Examination** may be provided to incarcerated (confined in prison or jail) individuals to address a sexual assault experienced by the incarcerated individuals while incarcerated or prior to incarceration. **Note:** SAFE Response rules will not support the cost of examinations for sexual assaults that occur during incarceration. MCL 18.360(d); MCL 18.355a.
- **Legal services/representation:** Please consult legal services allowability chart and associated guidance.

### Service Animals and Pets

Grantees may use DVS grant funds to support expenses that are related to securing the safety of such an animal during the sheltering, housing, or relocation of such victims. See DVS Additional Guidance – FAQ: Service Animals and Pets for additional information.

Allowable Costs	Pets	Service Animals	Canine Advocates	Emotional Support Animals
Pet food while the client is in an emergency domestic/sexual violence shelter/boardings	Yes <sup>1</sup>	Yes	NA	Yes <sup>1</sup>
Pet Food for non-shelter clients	No	No	NA	No
Veterinary care while animal is in shelter / boarding	No	No	NA	No
Veterinary care while animal is not in shelter / boarding	No	No	NA	No
Boarding of animals	Yes <sup>2</sup>	NA	NA	Yes <sup>2</sup>
Shelter modifications to board animals on site	No	No	NA	No
Vaccinations - w/o boarding	No	Yes	NA	No
Vaccinations required before boarding	No	N/A	NA	No
Veterinary care if in TSH housing	No	No	NA	No
Deposits for housing	Yes	Yes	NA	Yes
Deposits for TSH housing	Yes	Yes	NA	Yes
Monthly animal fee for when the client is not in Emergency/TSH housing/shelter	No	No	NA	No
Monthly animal damage fee for while in TSH housing	Yes	Yes	NA	Yes
Litter and boxes for cats while clients are in shelter	Yes	Yes	NA	Yes
Litter and boxes for cats exited from shelter / boarding	No	No	NA	No

Purchase or construction of kennels/pens/run lines for animals to be outside	No	Yes	NA	No
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<sup>1</sup>Not allowable in any grants funded by VOCA

<sup>2</sup>\$1,200 per year cap per client combined for all costs

### Segregation or Sex Specific Programming

Grantees may not exclude any person from receiving grant funded services on a number of prohibited grounds, including that person’s sex. If sex segregation or sex-specific programming is necessary to the essential operation of a program, nothing in this paragraph shall prevent any such program or activity from consideration of an individual’s sex. In such circumstances, Grantees may meet the requirements of this paragraph by providing comparable services to individuals who cannot be provided with the sex-segregated or sex-specific programming.

### Reproductive Health Options and Services

Based on rights guaranteed by Article I, Section 28 of the Michigan Constitution, service participants shall have equal access to information about all reproductive health options and services. If the subgrantee organization does not provide participants with information about how to access all reproductive health options and services for any reason, including, but not limited to, moral or religious objections, the subgrantee must have a MOU or linkage agreement with another provider that will ensure participants have access to all reproductive health options and services. “Reproductive health options and services” specifically means medically accurate information about contraception, abortion, STI and HIV testing, HIV counseling, cancer screening, and HPV vaccination.

### Inclusivity of Services

MDHHS-DVS Contracts are subject to the following terms and conditions:

1. The Grantee may not exclude, deny benefits to, or discriminate against any person on the basis of any individual or group because of actual or perceived race, sex, religion, age, national origin, color, height, weight, marital status, gender identification or expression, sexual orientation, partisan considerations, or a disability or genetic information.
2. The Grantee will take reasonable steps to provide services and information in appropriate languages, other than English, to ensure that persons with limited English proficiency are effectively informed and can effectively participate in and benefit from its programs, services, and activities.

Program facilities must allow for full participation of clients with a variety of special needs.

### Further Resources

[Omnibus Crime Control and Safe Streets Act of 1968, 34 U.S.C. § 10228\(c\)\(1\)](#)

[Frequently Asked Questions - Nondiscrimination Grant Condition in the Violence Against Women Reauthorization Act of 2013 \(justice.gov\)](#)



## Limitations

### Promotional Items Guidelines

MDHHS-DVS Grantees are not permitted to purchase promotional items for distribution or fundraising using DVS administered funds. Promotional items/trinkets/giveaway items are items that serve no project purpose. These are not allowed to be purchased with DOJ funds. Examples of trinkets or giveaway items may include mugs, t-shirts, hats, gift bags, “thank you” gifts for speakers, memorabilia, commemorative items, conference giveaways regardless of whether they include the conference name or logo.

### Fundraising

DVS grant funds cannot be used for fundraising costs including direct costs for fundraising events, staff time to participate in fundraising events, grant writing, etc.

## Reporting and Certifications

### Overview of Reporting

System/Mode Used	EGrAMS - All DVS Grantees unless noted	IGX Report	OVC/PMT - VOCA Grantees ONLY	Complete and keep on file	Upload to IGX - Requirements as noted in footnotes	Survey Monkey Link	OVW Web based system
<b>Monthly</b>							
Financial Status Report (FSR)	X						
Activity Report		X <sup>1</sup>			X <sup>2</sup>		
<b>Quarterly</b>							
Work Plan/Activity Report	X						
Performance Measurement Tool (PMT) Quarterly			X <sup>3</sup>				
MSHDA Shelter Inspection Checklist				X <sup>9</sup>			
<b>Semi-Annual</b>							
Semi-Annual Activity & Narrative		X <sup>4</sup>			X <sup>5</sup>		
<b>Annual</b>							

	Fiscal Questionnaire	Local Share Report 6	SAR Projection		Inspection Certification Form	Annual Certifications	Annual Progress Report (STOP and SASP SAPR)
	Obligation FSR (mid-September)					Media & Client History <sup>8</sup>	
	Final FSR (October 30)					x	
	Equipment Inventory <sup>7</sup>						
1 Report form on IGX for DV, SACS, SANE, STOPC, STOPL, STOPP, STOPV, TSH <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a> .							
2 Report form is an Excel document for some CSU Grantees emailed to Grantee at the beginning of the fiscal year. Please complete and upload to Organization Uploads page. <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a> .							
3 Data entered for VOCA grants on the Performance Measurement Platform <a href="#">OJP PMP Login</a> .							
4 Report form on IGX for DV, SACS, STOPC, STOPL, STOPP, STOPV, TSH <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a> .							
5 Report form is an Excel document for some CSU Grantees emailed to Grantee at the beginning of the fiscal year. Please complete and upload to Organization Uploads page. <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a> .							
6 DVCS (TANF/GF) Grantees only.							
7 Grantees with procurement purchases of \$5,000 per unit budgeted.							
8 VOCA Grantees only.							
9 DVCS (TANF/MSHDA) grantees only							

## Late Reports

Reports include any required materials specified in a Grantee/subgrantee’s Agreement with DVS. Once any due date specified in an Agreement has passed, until all requested material/items are received, deemed accurate and sufficient, it is considered overdue.

- Immediately following a missed deadline, an overdue notice will be sent to the organization’s Executive Director and/or the Authorized Official if they are not the same person.
- A second overdue notice will be sent to the organization’s Executive Director, Authorized Official, and to the agency’s Board President or Department Leadership.
- If the missed deadline is not resolved within 30 days of initial notice, an immediate stop work order will be issued.

DVS may consult with the Director of the MDHHS Policy, Planning and Operational Support before imposing more severe sanctions and must consult with the Director of MDHHS before imposing

sanctions for awards that are identified in state law or statute or otherwise directed by the Michigan Legislature or pass-through entitlement grants.

## Overview of Certifications

Type of Certification	Where/how it is certified	How often is it certified
VOCA Eligibility	<b>Current Grantees:</b> Egrams Rollover Application  <b>New Grantees:</b> RFP or equivalent	<b>Current Grantees:</b> Annually  <b>New Grantees:</b> At point of grant initiation
Inspection Certification	Form submitted on DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Lobbying Certification	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Debarment & Suspension	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Drug Free Workplace	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Civil Rights Requirements	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Understanding of Methods of Administration	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
EEOP Requirements	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Non-Discrimination Compliance	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Limited English Proficiency (LEP)	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Religious Institution/Faith Based Organization Certification	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Local Share Report	DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
Fiscal Questionnaire	Egrams <a href="https://egrms-mi.com">EGrAMS : Home (egrms-mi.com)</a>	Annually
<b>STOP Grant Requirements</b>		
Sex-Segregated/Sex-Specific services	Annual Certification DVSGMS/IGX <a href="https://milogintp.michigan.gov">https://milogintp.michigan.gov</a>	Annually
PPO Requirements	Annual Certification DVSGMS/IGX	Annually
Prohibition of services that compromise victim safety	Annual Certification DVSGMS/IGX	Annually
Certification of grant requirements	Annual Certification DVSGMS/IGX	Annually

## Grant Funding and Financial

### Division of Victim Services Funding Source List

The following is a list of primary funding sources administered by DVS. This is not an exhaustive list. Funding sources change frequently. All funding sources can be found here: [MDHHS - Contractor and Subrecipient Resources \(michigan.gov\)](#)

#### US Department of Justice

- Office of Justice Programs
  - The Office of Victims of Crime:
    - Victims of Crime Act (VOCA)
    - Crime Victim Compensation
  - The Office of Violence Against Women:
    - STOP Violence Against Women Formula Grant Program (STOP)
    - Sexual Assault Services Formula Grant Program (SASP)

#### US Department of Health and Human Services

- Administration for Children and Family
  - Family and Youth Service Bureau
    - Family Violence Prevention and Services Admin (FVPSA)
- Centers for Disease Control and Prevention (CDC)
  - Preventative Health and Health Services Block Grant (PHHSBG)
- Temporary Assistance for Needy Families (TANF)
  - State and Federal TANF Funds

#### State-Restricted Funds

- Prosecutor-based Crime Victim Rights (CVRP)
- Crime Victim Training Grants (CVRT – Discretionary)
- Crime Victim Rights Juvenile Court (CVRJC)
- Child Advocacy Center Fund (CAC)
- Sexual Assault Nurse Examiner Fund (SANE)
- Sexual Assault Forensic Exam (S.A.F.E) Response

#### State General Funds/General Purpose

- Human Trafficking Victim Services Expansion Programming (HTPVS)
- Human Trafficking Expansion Pilot Program (HTEPP)
- Child Advocacy Center Supplemental (CACs)
- Michigan State Housing Development Authority (MSHDA)
- Crime Victim GF-GP Fund (acronym on EGrAMS to be determined)



2021 that required match to be automatically waived for all VOCA subrecipients for the duration of the National Emergency declaration due to the COVID-19 pandemic, and for the full year after it is ended. As a result, no VOCA match was collected/reported for all of FY 2022, FY 2023, and will not be collected/reported for all of FY 2025.

## Budget Revisions

The approved budget for a DVS award is part of a legally binding agreement. Changes to a Grantee project may occur during a fiscal year. An grant Amendment may be required.

The purpose of budget revisions is to reallocate funds among existing line items in an approved contract budget or to add funding to a line item that does not currently have funding, or to add new staff positions. In rare occasions, EGrAMS amendments can reduce or increase the total award amount, when approved by DVS staff.

Budget revision requests must include a justification and the purpose of the changes to the project and budget. *If you know your grant will be underspent, consider requesting an amendment earlier in the fiscal year to expend those funds. The goal is to fully expend your award.*

### *EGrAMS amendments are only required to a grant agreement budget when:*

- There is any significant change in program objectives including changes in the positions charged to the grant.
- There is any increase or decrease in the total amount of the grant.
- A line-item increase exceeds 15% of the line item or \$10,000, whichever is greater.
- A new line item is being added to the budget.
- Any change in the total grant amount.

### *Budget Revision Request – EGrAMS Amendment Approval Process:*

- Grantee sends in Budget Revision Request to [MDHHS-DVS@michigan.gov](mailto:MDHHS-DVS@michigan.gov).
- DVS Grants and Contracts/Quality Assurance Team staff will review for approval.
- The request is submitted to MDHHS BGP for approval.
- EGrAMS amendments can be requested through early May. EGrAMS amendment requests will be consolidated by grant and sent in to initiate changes in EGrAMS on a weekly basis.
- MDHHS BGP opens the Grant Agreement Budget for revision on EGrAMS.
- Grantee makes changes directly in Grant Agreement Budget in EGrAMS.
- Authorized Official must submit amended agreement for DVS/MDHHS approval and then must sign amended agreement to finalize changes.

## Supplanting

Agencies are expected to use federal funding to supplement State and local funds, rather than to replace those funds with federal dollars. The DOJ Financial Guide updated March, 2022 identifies Supplanting as:

SUPPLANTING is to deliberately reduce State or local funds because of the existence of Federal funds. For example, when State funds are appropriated for a stated purpose and Federal funds are awarded for

that same purpose, the State replaces its State funds with Federal funds, thereby reducing the total amount available for the stated purpose.

### Further Resources

[DOJ Financial Guide: Pre-award Requirements – Standards for Financial Management Systems – Supplanting](#)

[FVPSA: 42 U.S.C. § 13925\(b\)\(5\) Definitions and grant provisions – Grant conditions – Non-supplantation](#)

[eCFR :: 28 CFR 94.108 -- Prohibited supplantation of funding for administrative costs.](#)

[OJP Supplanting Guide Sheet: Supplanting Guide Sheet \(ojp.gov\)](#)

## Financial Issues and Audits

### Grantee Financial Audit Issues

Organizational financial statements/audits are reviewed for outstanding issues which may require follow up. Financial audits are completed by the MDHHS Bureau of Audit. Findings are reported to the DVS funded organization and DVS staff, specifying any return of funds required.

### Returning Funds Following an Audit or Other Review

#### Repayment of Funds following MDHHS Audit

When funds must be returned to DVS as the result of a MDHHS audit following the closure of the fiscal year, the MDHHS Bureau of Audit will inform the Grantee regarding the necessary steps to be taken.

#### Repayment of Funds from within Current Fiscal Year (Prior to Fiscal Year Close)

For the majority of DVS administered grants, if DVS has requested the return of funds or the Grantee has identified an error in a Financial Status Reports (FSR) submitted during the current/open fiscal year, corrections may be applied in a future FSR. Grantees must submit a FSR with corrections attributed to the correct pay period. After this FSR is submitted and approved, future payments will reflect the difference. Please reach out to your DVS Grant Analyst with questions on this process.

#### Repayment of Funds from Closed Fiscal Year (outside of MDHHS Audit)

When funds are requested to be returned to DVS outside of a MDHHS audit (e.g., following a desk review or programmatic contract review) after the closure of the fiscal year, a check addressed to the State of Michigan should be mailed to:

MI Department of Health and Human Services  
PO Box 30037  
Lansing, MI 48909  
Attention: Division of Victim Services

The following information should be included with the check:

- Program Title (*Grant Program*)

- MDHHS Agreement Number *(required)*
- MDHHS Agreement Period (Fiscal Year) *(required)*
- Federal Award Identification Number (Please contact your DVS Grant Analyst if you do not know this number.)

## Required Financial Policies

### Segregation of Duties

Grantees should have written accounting policies and procedures (including those for the receipt and disbursement of funds, purchasing, and payment of expenditures) that require appropriate segregation of duties that are relevant to the agency's information technology systems, and the programs funded by DVS. Position responsibilities should be clearly indicated, including consideration for access to and use within accounting systems.

#### Further Resources

[2 CFR 200.303: Internal Controls](#)

### Client Assistance Policy

Your organization's policy may be requested in the event of an audit or other review and should contain internal financial controls designed to minimize the possibility of fraud.

DVS requires that Client Assistance items are budgeted to be available to clients throughout the grant period. As funding is limited, DVS recommends that Grantees have a board-approved policy to ensure equitable distribution of client assistance, which includes the amount budgeted per client. Grant budgets should include total number of clients projected for allowable client assistance items.

Best practice policies include:

- What type of assistance is being distributed and the maximum that can be dispersed per client and/or family unit,
- How the funds will be tracked in a way consistent with accounting principles while maintaining client confidentiality,
- What supporting documentation is required for purchases,
- Who will be responsible for client assistance and what approvals are required,
- The process of reviewing and verifying that charges were allowable.

Elements to consider maintaining in a client assistance log include:

- Funding source,
- Person authorizing release of funds,
- Date of distribution,
- Type of assistance,
- Amount or quantity,
- A mechanism for identifying the client that does not contain Personally Identifiable Information (PII), such as a non-identifying client ID number.



## Vendor/Gift Cards

Please refer to the DVS Allowability Chart to determine whether gift cards are an allowable cost under your specific grant(s). It is expected that gift cards are distributed to clients in the fiscal year that they are purchased.

If you distribute gift cards with DVS funds, you must have a policy and/or procedures to ensure that gift cards are:

- Logged in by gift card number,
- Logged out by gift card number,
- Logged by funding source that purchased the gift card,
- Distributed to clients eligible for the services from which the gift cards were purchased,
- If a log is used to verify distribution to clients, the log must use an identifier that does not reveal Personally Identifiable Information (such as a client ID number). The log must include the gift card number, amount on card, client number and date.
- Used for allowable costs, per the applicable grant requirements/restrictions.

Grantees that distribute DVS funded gift cards are responsible for ensuring the following:

- Gift card log is reconciled regularly.
- Regular/random checks are conducted on gift card balances.
- There is a mechanism for limiting purchases to only those that are allowable. This may include purchasing vendor cards that limit what can be purchased, obtaining receipts, etc.
- Gift cards are distributed to clients eligible for the services.

## Comingling of Funds

DVS Grant Agreements (Attachment E) require that Grantees have systems in place to ensure funds are not comingled. DVS funded agencies must meet relevant provisions set out by each federal funder (DOJ and HHS) depending on the funding that supports your grant. Failure to meet these requirements can result in audit findings. Fund tracking requirements include: [eCFR :: 2 CFR 200.302 -- Financial management](#).

- 1) For each funding stream, be able to identify the Catalog of Federal Domestic Assistance (CFDA) title and number, federal award identification number and year, name of awarding federal agency, and name of the pass-through entity (i.e., state administering agency).
- 2) The Grantee's accounting system must be able to account for each funding stream separately.
- 3) The financial management systems, including records documenting compliance with federal statutes, regulations, and the terms and conditions of the federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that the Grantee's use of such funds complies with federal statutes and regulations and the terms and conditions of each federal award.
- 4) Must submit separate program progress reports for each funding stream, which show what activities were supported with that funding.
- 5) Must be able to provide accurate, current, and complete disclosure of how funds were expended for each federal award or program.

- 6) Must maintain records that identify and adequately the source application of funds for federally-funded activities and how those funds are applied to the grant activities. These records must contain information pertaining to federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest and be supported by source documentation.

## Procurement Standards

“Procurement” is the process of the following:

- Choosing vendors
- Establishing payment terms
- Negotiating contracts
- Purchasing goods
- Purchasing services

You must use your organization’s own documented procurement procedures for procurement transactions using Federal award funds. Your organization’s procedures must be as follows:

- Consistent with applicable State, local and Tribal laws and regulations.
- If your agency’s thresholds are higher than the Federal thresholds described in this document, you must use the Federal thresholds.

NOTE: It does not matter if the cost is split across multiple grants. The overall per unit cost is the basis for compliance with procurement requirements.

### *What is the DVS Procurement Certification form?*

The **Procurement Certification Form** is required for any purchase of service/equipment with a unit cost of \$5,000 or more, including the purchase of software.

### *What are the Procurement Certifications?*

#### *Pre-Purchase Requirements*

1. The equipment/service was included in the approved budget, and it is necessary and sufficient to meet the project goal.
2. A purchase/lease comparison demonstrating that it is more advantageous to purchase rather than lease the equipment was conducted.
3. The procurement process met or exceeded federal requirements.
4. The procurement process followed organizational procurement policy(ies).
5. The equipment/service requested was not currently available for the use of this project or within the organization/agency.
6. Applicable federal procurement procedures were reviewed and followed.
7. The CFRs for Equipment and Other Capital Expenditures and General Procurement Standards were reviewed and understood.
8. If HHS/FVPSA funding (DVCAF, SFMI, SFSA, DVCSF) supports the purchase, written approval was received from HHS/FVPSA.

### *Purchase, On-Going Use, and Disposal Requirements*

1. The receipt(s) for the purchase must be attached to the applicable line item on the FSR when billed.

**NOTE: For FY 2023: Please upload receipts to the final September 2023 FSR. If purchase was supported by more than one grant, upload receipts to all applicable September 2023 FSRs.**

2. Grantees must maintain a readily identifiable inventory of nonexpendable personal property purchased in whole, or in part, with these funds that costs \$5,000 or more. Inventory of this property shall be made a part of the Grantee's official records and shall be available for review by authorized state personnel. At a minimum, property management records shall meet the following [2 CFR § 200.317 through 2 CFR § 200.326- Procurement Standards](#) and [2 CFR § 215.40](#) and meet the following requirements:
  - a. Item description.
  - b. Manufacturer's serial number. Acquisition date and cost.
  - c. Location of property.
  - d. Ultimate disposition date, including sale price or method used to determine fair market value.
  - e. Method of disposition.
3. Equipment will be reported annually by attaching and submitting the MDHHS Equipment Inventory Form to the final September FSR.
4. Equipment will be disposed of in accordance with federal requirements. [eCFR :: 2 CFR 200.313 -- Equipment.](#)

[DOJ Financial Guide FY2022: Postaward Requirements-Procurement Under Awards of Federal Assistance](#)

## **Grant Monitoring**

### **DVS Grantee Risk Assessment**

DVS completes an annual risk assessment in accordance with 2 CFR 200 and MDHHS Policy APA 212. The role of the risk assessment is to identify possible concerns, assess likelihood of risks, identify appropriate action to help mitigate the risks and develop contingencies if needed to help control for risk. DVS is charged with completion of the annual risk assessment to evaluate each DVS-funded Grantee's risk of noncompliance with federal statutes, regulations, and the terms and conditions of the award for the purposes of determining the appropriate level of Grantee monitoring.

The risk assessment is completed for each current DVS grant agreement. Annually, the risk assessment score informs monitoring of DVS Grantees in combination with the DVS five-year schedule. At any time, DVS may reassess an organization's risk score, or the schedule of monitoring activities, based on issues of client safety, ineligible expenditures, client confidentiality, unallowable activities, misappropriation of funds, information from other funding sources, or abrupt or numerous departures of key personnel. Grantees can contact the Director of Quality Assurance to discuss their organization's risk score.

The risk assessment will be completed utilizing predefined criteria and will assign a numerical score for each agreement. The scores are compiled in a chart which is utilized to determine necessary interventions.

The following risk factors at a minimum are considered in assessing risk:

1. Total dollar amount of grant award.
2. Previous grant award experience.
3. Previous financial and compliance monitoring.
4. Frequency of staff turnover.
5. Financial management problems or financial instability.
6. Significant findings or questioned costs from prior audit.
7. Other issues of noncompliance.
8. Recurring or unresolved issues.
9. Programmatic noncompliance.
10. Recent monitoring.

## **DVS Monitoring Plan**

DVS develops monitoring plans for DVS funded Grantees. DVS develops an annual monitoring plan incorporating assessed risk and the five-year monitoring schedule. The monitoring plan may include the monitoring activities listed below. A plan will be adopted for the fiscal year; however, issues may arise that would cause DVS to reclassify the Grantee's risk level and modify monitoring plans.

The DVS monitoring plan is completed each fiscal year and guides the quality assurance activities for the upcoming year. A monitoring calendar for the year is created and integrated with ongoing monitoring activities for subgrantees, e.g., review of submitted financial, program statistics, and narrative reports; contract and standards review visits; and participation in Grantee meetings.

**DVS monitoring, quality assurance, and technical assistance activities can include but are not limited to:**

- a. On-site and/or virtual review of grant awards, programmatic and fiscal operations
- b. Fiscal reviews of organization
- c. Fiscal/programmatic desk reviews
- d. Review of required reports
- e. Review of policies and procedures
- f. Provision of training and/or technical assistance

**DVS monitoring, quality assurance, and technical assistance activities may result in the following:**

- a. The development and implementation of corrective action plans/strategies
- b. Additional progress reporting requirements
- c. Review of revised policies and procedures
- d. Temporary holds on cash payments
- e. Disallowed activities or costs
- f. Suspended or terminated awards
- g. Arrange for agreed-upon financial auditing procedures
- h. Other remedies that may be legally available

## Office-Based Monitoring and Site Reviews

### Financial Statement Reviews

DVS requires Grantees to complete a monthly Financial Status Report (FSR). A fiscal review will be completed of selected Grantees.

### Desk Reviews

There are three types of desk reviews: A – Financial (allowable expenses), B – Programmatic (permissible activities), C – Programmatic (policy compliance). Desk reviews may include an evaluation of internal controls, selected policies and requested documentation for selected line items on designated FSRs submitted in the identified time period.

Desk reviews will be completed for Grantees who score in the moderate range on the annual risk assessment and do not have a standards or contract review scheduled during the fiscal year. Grantees who score as low risk may have desk reviews added based on emerging concerns related to reporting or findings in a recent on-site monitoring visit.

### Monthly, Quarterly, and Semi-Annual Performance and Activity Report Reviews

DVS has established a variety of other monitoring activities that are financial and programmatic in nature. The activities are performed by various DVS staff including contract analysts, departmental technicians, Quality Assurance staff, specialized staff, and attorneys. A summary of the activities includes review of monthly FSRs, review of semi-annual reports, review of various reports, review contract certifications, federal grant reporting, pre-award monitoring, technical assistance, informal monitoring (financial/agreement monitoring), and project oversight (quarterly calls, review of programmatic reports).

### Fiscal Questionnaire Review

All DVS Grantees are required to complete and submit the MDHHS Fiscal Questionnaire annually, the Fiscal Questionnaires are reviewed as part of standards reviews, programmatic contract reviews, MDHHS financial audits, and/or desk reviews. Grantees found to be low risk on the annual risk assessment and that do not have a scheduled Standards Review or Programmatic Contract Review will be reviewed by DVS Senior Financial Analyst.

### Monitoring and Site Reviews

DVS completes, at a minimum, two hybrid onsite/virtual programmatic reviews of funded programs during a five-year period (generally aligns with the period of Grant Agreements). Reviews and audits are comprised of Programmatic Contract Reviews, Standards Reviews, and MDHHS Bureau of Audit financial audits. Contract and Standards Reviews are scheduled on a 5-year cycle but may be adjusted based on the annual risk assessment results and additional factors. Financial audits are scheduled annually based on the annual risk assessment results.

The Standards and Programmatic Contract Reviews are a combination of onsite and remote monitoring. Facility walk throughs will be conducted on site, while interviews and document review will be

conducted virtually. Onsite activities may be limited due to state travel restrictions due to health and safety concerns and, in that event, the entire review will be completed remotely. Additionally, the ability to visit a program may be impacted by unforeseen circumstances and in this instance, monitoring will be completed but adjusted for remote review including virtual tours and face-to-face virtual interviews.

Domestic violence and sexual assault agencies will have one Standards Review and one Programmatic Contract Review in a five-year period. All other Grantees will receive two Programmatic Contract Reviews in a five-year period.

## Standards Reviews

DVS funded comprehensive domestic violence and/or sexual assault services programs will receive a Standards Review once every five years. The Standards Review model has evolved through a collaborative, ongoing process which involves DVS staff, as well as current and former movement leaders who have identified the qualities that are commonly present in operating a strong organization that embraces survivor- focused, empowerment-based services. The current standards can be found [here](#), and encompass 138 standards that have been identified and broken into the following nine sections:

- Policy & Governance
- Financial Management
- Program Administration & Service Delivery
- Sexual Assault Nurse Examiner (*if funded*)
- Transitional Supportive Housing (*if funded*)
- Staff & Volunteer Management
- Community Engagement & Fund Development
- Systems Change
- Facilities, Safety, Security & Health

## Programmatic Contract Reviews

The DVS Programmatic Contract Review includes a team of reviewers and focuses on documenting that the Grantee complies with the requirements of the grant agreement(s) with an emphasis on client eligibility, permissible activities, and allowable costs.

## Division of Victim Services Response to Grantee Performance Concerns

The Division of Victim Services (DVS) recognizes the importance of having programs throughout the state of Michigan to meet the safety, emotional, physical, financial and other needs of victims. In the course of providing both formal and informal monitoring and technical assistance, DVS may identify grantee actions, inactions, and/or circumstances that lead to performance concerns. In general, DVS works in partnership with grantees to address concerns in a way that supports the organization in achieving its mission and faithfully administering DVS funds before punitive actions must be taken. However, there are instances in which it may be necessary to implement additional accountability measures, up to and including discontinuation of funding.

The following is a list of potential grantee actions, inactions, community, staff, or service participants complaints/concerns and circumstances that may create performance concerns for DVS as well as a list of potential actions that DVS may take as a result. When determining a course of action, DVS takes into

account DVS's history with the grantee, organizational context (e.g., type of agency, leadership changes, and other challenges), in addition to the grantee's willingness and ability to make necessary changes. If necessary changes are not made by the grantee after DVS takes an action listed below, additional action may be taken.

### Grantee Actions, Inactions, or Circumstances that may Lead to Performance Concerns

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- Failure to meet MDSVPTB standards or persistently low scores on MDSVPTB standards
- Evidence that practices are harmful to survivors, unethical, illegal, or risky
- Lack of responsiveness to required corrective action resulting from DVS-identified concerns
- Failure to correct identified concerns despite prior opportunities being provided for corrections
- Repeat or significant findings from standards, contract, desk reviews and/or MDHHS Financial Audits, including lack of sufficient time and effort reporting, questioned costs, service delivery model concerns
- Organizational activities that jeopardize the State of Michigan or State of Michigan funding
- Evidence of fraud/mismanagement of funds
- Lack of responsiveness to repeated requests for information needed to conduct monitoring activities
- Lack of compliance with contract elements such as proper insurance, background checks, required policies, submission of required audits, etc.
- Evidence that funding is being utilized outside the intended purpose
- Failure to provide services as outlined in grantee contracts (e.g., grantee does not provide all agreed upon services, grantee does not comply with client eligibility requirements)
- High cost-to-service ratio within the context of the service type provided (i.e., SANE, TSH and legal services may be more costly than other services)
- Significant findings related to questioned or unsupported costs or lack of internal controls, including findings related to time and effort reporting
- Make any mandatory reporting to federal funding sources

### Level 1 DVS Actions/Rationale

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These actions are determined and approved by the Quality Assurance Director. Although these actions may involve consultation with the Director of Grants and Contracts, approval from other DVS leadership is not required.

- **Technical assistance** – assistance, support, and resources are offered to ensure grantee barriers to address corrective actions are removed/lessened
- **Corrective action plan** – grantee is requested to submit additional documentation to demonstrate compliance with specific requirements within a given timeframe
- **Deferred corrective action plan** – for grantees with extenuating circumstances that have demonstrated willingness to address corrective actions but are unable to do so due to constraints outside of grantee's control; a deferred corrective action plan indicates that DVS will confirm that corrective action has been taken during the next contract/standards review
- **Additional monitoring activities** – grantees may subject to additional monitoring activities, which may include but not limited to additional walk throughs, contract review, desk review or other monitoring activities

## Level 2 DVS Actions/Rationale

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These actions are recommended by the Quality Assurance Director and require approval from the Director of Grants and Contracts and Deputy Director of Policy, Planning and Operation Support.

When it is determined that DVS will take one of the following actions, DVS will prepare written documentation notifying the grantee of the following:

1. Circumstances that led to the concern, including previous actions taken by DVS if applicable
  2. Rationale for the specific action taken by DVS as a result of the concern
  3. Actions required by grantee to remedy the concern, if applicable
- 
- **Provisional status** – grantees are notified that certain additional conditions must be met on an ongoing (e.g., monthly, quarterly) basis; required actions may differ depending on identified issue; may be programmatic or financial in nature; required technical assistance to address programmatic issues or required additional reporting to address financial issues
  - **Stop work order** – grantees are notified that all work on the funded project should cease and no expenses incurred during the given period of time are eligible for reimbursement until certain conditions/corrective actions are met
  - **Adjust contract terms and conditions through a contract amendment** – When there are identified concerns with specific elements or activities, an amendment removing specific conditions, activities and terms may be initiated.
  - **Decrease in award amount** – A decision may be made to reduce the amount of an award which could be based upon modification in services or determination of
  - **Ineligible for certain or additional funding opportunities** - An organization has demonstrated the inability to manage existing programming, which is also an indicator there is a lack of capacity to add other programming/services.
  - **Contract termination** – DVS will move to terminate the specific contract, this may impact a specific contract or all contracts.

## MDHHS Financial Audit

Onsite and/or virtual financial audits by MDHHS Bureau of Audit Division Staff (Audit Staff) will be scheduled for Grantees with the highest risk scores from the annual risk assessment that do not have an onsite visit planned as described above. Additional financial audits may be scheduled throughout the year based on emergent circumstances. In the event of unforeseen circumstances that limit travel, the audit will be performed remotely.



## Addendum/Reference Materials

### Acceptable Public Disclosure

An exempt organization must make specific tax documents available for public inspection and copying. These items include:

- IRS determination 501c3 letter
- Annual return (990 or 990EZ)

### Background Check Policy

- MDHHS Grant Agreement: *General Provisions – Criminal Background Check*

### Certification of Exemption for Hiring Practices on the Basis of Religion

The certification is part of the DVS Annual Certification and is completed by Faith-Based Organizations only.

- [Review requirements here](#)
- [Review additional OJP Information here](#)

### Conflict of Interest Policy for Board Members and Employees

- MDHHS Grant Agreement: *General Provisions – Conflict of Interest and Code of Conduct Standards*
- [1968 PA 317](#), as amended *Contracts of Public Servants with Public Entities*
- [1973 PA 196](#), as amended *Standards of Conduct for Public Officers and Employees*
- [2 CFR § 200.318 \(c\) \(1\) and \(2\) Procurement Standards](#) – *General procurement standards*
- DOJ Financial Guide: [Postaward Requirements – Grant Fraud, Waste, and Abuse – Conflicts of Interest](#)
- [2 CFR § 200.112 Conflict of interest](#)

### Employee and Participant Civil Rights Grievance Policy

Grantees must have policies in place for responding to discrimination complaints filed by employees and clients, customers, and program participants with the Grantee. The Grantee will promptly provide notice to the DVS Contract Manager of any complaints of discrimination made against the Grantee.

- MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*
- OJP, OVC: [Program Standards – Rewards, Corrective Actions, and Grievances](#)

### Equal Employment Opportunity Plan/Certification

The statutory and regulatory information contained on this page does not constitute legal advice and is for general informational purposes only. The OCR makes no guarantee that the statutory authority or regulatory code cited within is the most current version of said law/regulation. For more recent versions of the U.S. Code and the CFR, users should consult the official [revised U.S.C.](#) or the [eCFR](#).

An Equal Employment Opportunity (EEO) plan is a comprehensive document that analyzes a recipient's relevant labor market data, as well as the recipient's employment practices, to identify possible barriers to the participation of women and minorities in all levels of a recipient's workforce. Its purpose is to ensure the opportunity for full and equal participation of men and women in the workplace, regardless of race, color, or national origin.

As a recipient of Department of Justice funding, your organization may be required to submit a Certification Report or the Utilization Report portion of your plan to the Office for Civil Rights. If you are unsure of whether your organization is subject to the Civil Rights requirements of the Safe Streets Act, please refer to the FAQ [How can I tell if a recipient is subject to the Safe Streets Act?](#)

The Equal Employment Opportunity (EEO) Reporting System will allow you to create your organization's account, then prepare and submit an EEO Certification Form and if required, create and submit an EEO Utilization Report. You will also be able to access your organization's saved information in subsequent logins.

Excerpt from: [Civil Rights Office | Equal Employment Opportunity Plans | Office of Justice Programs \(ojp.gov\)](#)

- MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*
- [28 CFR §§ 42.301-.308 Equal Employment Opportunity Program Guidelines](#)
- [Submit at EEO documentation online](#)
- Review the [EEO Frequently Asked Questions](#) online

**EEOP Chart for Determining Office for Civil Rights Requirements**

If	Then	Does the recipient need to submit a Certification Form to OCR?	Does the recipient need to develop an EEOP?	Must the recipient submit an EEOP Utilization Report to OCR?
Recipient is a Medical or Educational Institution, Indian Tribe, or Nonprofit		YES	NO	NO
Largest individual grant received is less than \$25,000		YES	NO	NO
Recipient has less than 50 employees		YES	NO	NO
None of the above		YES	YES	YES

## Indirect Costs

Indirect costs may be entered into DVS budgets in the form of federally- or state-approved rates, the De Minimis rate (up to 15% of Modified Total Direct Costs), or, in certain cases, Cost Allocation Plans, in adherence to 2 CFR 200. If budgeted, indirect must be consistent across all federal grants and the same rate charged each month. DVS cannot advise on individual programs indirect costs. Grantees with questions are encouraged to consult with independent accountants.

- [DOJ Financial Guide: Postaward Requirements – Indirect Costs](#)
- [2 CFR § 200.414](#) Indirect (F&A) costs.

## Limited English Proficiency Plan

- MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*
- Read more information on the federal [Limited English Proficiency website](#)
- Review the [Language Access Assessment and Planning Tool](#) (2011)

## Non-Discrimination Policies and Notices for Employees and Services

- MDHHS Grant Agreement: *General Provisions – Non-Discrimination*
- MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*

## Nonprofit Solicitation License

- Charitable Organizations and Solicitations Act, [MCL 400.271](#): an organization must register if it solicits or receives contributions.

## On-Call Pay Policy

- **Payment for On-Call Time:** Grantees may choose to pay stipends to employees in addition to their base pay as compensation for being available to take calls outside of normal hours. If charging on-call time to DVS administered grants, the Grantee must compensate all employees, not only those funded by Federal grants, in the same manner. It is allowable for [VOCA](#) Grantees in compliance with Federal, state, and local labor laws to provide on-call pay for *one-hour* straight time pay for every *five* hours the employee is on-call.
- **On-Call Time:** An employee who is required to remain on-call on the employer's premises or so close to the employer's premises that they cannot use the time effectively for their own purposes is working while on-call. See FLSA, [29 CFR 785.17](#).

## Procurement/Equipment Policy

- [DOJ Financial Guide: Postaward Requirements – Procurement Under Awards of Federal Assistance](#)
- [2 CFR § 200.317](#) through [2 CFR § 200.326](#) *Procurement Standards*

## Record Retention Policy

- MDHHS Grant Agreement: *General Provisions – Responsibilities – Grantee – Record Maintenance/Retention*
- [DOJ Financial Guide: Postaward Requirements](#) – *Retention and Access Requirements for Records*
- [2 CFR § 200.334](#) *Retention requirements for records*

## Rent

- [DOJ Financial Guide: Postaward Requirements](#) – *Allowable Costs – Project Site*
- [2 CFR § 200.465](#) *Rental costs of real property and equipment*

Rent to be prorated according to grant-specific staff, clients served, or space utilized.

## Subrecipient/Contractor Monitoring

- MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*

## Time and Effort Reporting

- MDHHS Grant Agreement, Attachment E: *Division of Victim Services Grant Requirements: Program Specific Requirements*
- DVS GoToWebinar [Training on Activity Tracking](#)
- [Time and Effort Best Practices for VOCA-Funded Personnel](#)
- [DOJ Financial Guide: Postaward Requirements](#) – *Allowable Costs*
- [2 CFR § 200.430 Compensation](#) - *Personal Services*

## Travel Policy

- MDHHS Grant Agreement: *General Provisions – Responsibilities – Grantee – Travel Costs*
- [DOJ Financial Guide: Postaward Requirements](#) – *Allowable Costs – Travel*
- [2 CFR § 200.474](#) *Travel costs*

## Whistleblower Policy

- MDHHS Grant Agreement: *General Provisions – Assurances - National Defense Authorization Act Employee Whistleblower Protections*

## Additional Links:

[Crime Victim Compensation Program](#)

[Department of Justice Financial Guide](#)

[Division of Victim Services](#)

[Michigan Domestic and Sexual Violence Prevention and Treatment Board](#)

[Michigan Victim Advocacy Network](#)

## Overview of Trainings

Type of Training	Where is training completed?	How often is it certified
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Federal Civil Rights Training	<a href="https://ojp.gov/about/ocr/ocr-training-videos/video-ocr-training.htm">https://ojp.gov/about/ocr/ocr-training-videos/video-ocr-training.htm</a>	Annually
Crime Victim Compensation Trainings	MiVAN <a href="#">Michigan Victim Advocacy Network - MiVAN</a>	Initial hire period
<b>OJP Required Trainings</b>		
Overview of Civil Rights and Laws	<a href="#">Office for Civil Rights — Training for Grantees   Overview   Office of Justice Programs (ojp.gov)</a>	Annually
Limited English Proficiency Overview	<a href="#">Office for Civil Rights — Training for Grantees   Limited English Proficiency Overview   Office of Justice Programs (ojp.gov)</a>	Annually
Service to LEP Person	<a href="#">Office for Civil Rights — Training for Grantees   Service to LEP Persons   Office of Justice Programs (ojp.gov)</a>	Annually
Faith Based Organizations (if applicable)	<a href="#">Civil Rights Office   Partnerships with Faith-Based and Other Neighborhood Organizations   Office of Justice Programs (ojp.gov)</a>	Annually
American Indians (if applicable)	<a href="#">Office for Civil Rights — Training for Grantees   American Indians   Office of Justice Programs (ojp.gov)</a>	Annually
Standard Assurances	<a href="#">Office for Civil Rights — Training for Grantees   Standard Assurances   Office of Justice Programs (ojp.gov)</a>	Annually
Title VI Overview	<a href="#">Office for Civil Rights — Training for Grantees   Title VI Overview   Office of Justice Programs (ojp.gov)</a>	Annually
Violence Against Women Act Nondiscrimination Grant Conditions	<a href="#">Office for Civil Rights - Training for Grantees Violence Against Women Act Nondiscrimination Grant Conditions (justice.gov)</a>	Annually
<b>Other Training Requirements</b>		
New Service Provider Training or equivalent (domestic violence and sexual assault grants only)	In person. Calendar of upcoming trainings can be found at: <a href="https://mcedsv.org/training-ta/training-calendar/">https://mcedsv.org/training-ta/training-calendar/</a>	Required when initially hired
Child Advocacy Centers funded through Children’s Advocacy Centers (CAC/CACS/CACV)	<a href="#">National Children’s Alliance</a> (NCA).	Required when initially hired
All staff funded through a DVS Grant not previously listed	<a href="#">Victim Assistance Training Online</a> , provided by OVC Training & Technical Assistance Center (TTAC).	Required when initially hired

Confidentiality Webinar Series	MiVAN <a href="#">Michigan Victim Advocacy Network - MiVAN</a>	<ul style="list-style-type: none"> <li>All staff must attend revised training for FY 2025.</li> <li>All new employees.</li> </ul>
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### Information Available on the DVS Website

The DVS website has a considerable amount of information available for grantees [Current Grantees \(michigan.gov\)](#).

Forms		
Form Name	What it is used for	Where you can find it
Amendment and Out of State Travel Request Form	Requesting an amendment to a contract/grant and/or approval for out of state travel	<a href="#">Guidelines, Forms and Resources (michigan.gov)</a>
Procurement Certification Form	Form required when purchasing items/services with a unit cost of \$5,000 or more.	<a href="#">Guidelines, Forms and Resources (michigan.gov)</a>
MDSVPTB TANF Form	Determining TANF eligibility for DVCS and TSH Grantees.	Will be posted to the DVS Website when released <a href="#">Division of Victim Services (michigan.gov)</a>
AEAP/AEAPM Reporting Form	Form used to report information on AEAP/AEAPM services provided.	<a href="#">AEAP-Report.xlsm</a>

Guidance Documents	
Type of FAQ	Link
Conflict of Interest	<a href="#">FAQ---Conflict-of-Interest.pdf (michigan.gov)</a>
Incarcerated Victims	<a href="#">FAQ---Incarcerated-eVictims.pdf (michigan.gov)</a>
Service Animals and Pets	<a href="#">FAQ---Service-Animals-and-Pets.pdf (michigan.gov)</a>
Legal Services	<a href="#">FAQ---Legal-Services.pdf (michigan.gov)</a>
Transitional Supportive Housing	<a href="#">FAQ---Transitional-Supportive-Housing.pdf (michigan.gov)</a>
Client Assistance	<a href="#">FAQ---Client-Assistance.pdf (michigan.gov)</a>
Additional Resources	
Federal Special Conditions	<a href="#">Terms and Conditions (michigan.gov)</a>
Quality Assurance Standards & Forms	<a href="#">Grantee Monitoring and Standards (michigan.gov)</a>
Language Access and Civil Rights Resources	<a href="#">Civil Rights and Language Access (michigan.gov)</a>
Applying for Funding	<a href="#">Applying for Funding (michigan.gov)</a>
Crime Victim Rights Grant Information	<a href="#">Crime Victim Rights Grantees (michigan.gov)</a>
Overview of DVS Funding Administered	<a href="#">State and Federal Funds Administered (michigan.gov)</a>
VOCA Match Waiver Policy	<a href="#">VOCA-Match-Policy.pdf (michigan.gov)</a>

## Revision History

Section	Details
FY 2022 Grantee Guidelines	Prepared 2021, Approved 8/2021
FY 2023 Grantee Guidelines & Policy Manual	Prepared 2022, Approved 7/2022
FY 2023 Grantee Guidelines & Policy Manual	Approved 8/2023
FY 2025 Grantee Guidelines & Policy Manual	Approved 5/2024

Revision process: This document will be annually reviewed and updated. A comparison document showing the changes will be made available.