Grantee Guidelines

Fiscal Year 2027

(Updated 7/2026)

Michigan Department of Health & Human Services
Division of Victim Services

FY 2027 MDHHS
Division of Victim Services Grantee Guidelines

Grantee Guidelines Introduction

These procedures are designed to assist Division of Victim Services (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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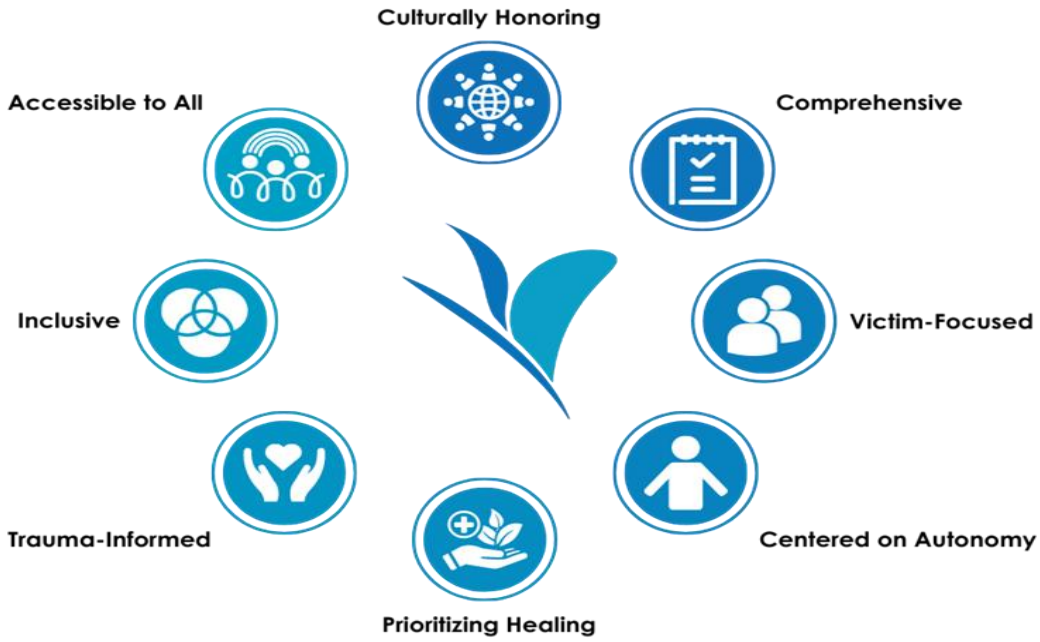
DVS Philosophy

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.

Comprehensive: An array and combination of services provided in a manner that meets complex needs as identified by victims/survivors.

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: The Grantee respects the victim's right to choose which services they would like to participate in and gives the victim/survivor power to direct their life.

Prioritizing healing: The focus is on the survivor's 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 everyone'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).

Inclusive: 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 (including linguistic, geographic, religious, sex, economic, ethnic, racial, developmental, disability, sexual orientation, and gender identity) of victims/survivors and their loved ones in a safe, inclusive, and welcoming environment.

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
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	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.
ALN (formerly CFDA)	Assistance Listing Number (formerly the Catalog of Federal Domestic Assistance -CFDA) ALN is a government-wide compendium of Federal programs, projects, services, and activities that aid or benefits to a variety of recipients. The ALN summarizes financial and nonfinancial assistance programs administered by departments and agencies of the Federal Government.
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 Grant Funding Opportunity (GFO) or bid; GFO formerly referred to as an RFP (Request for Proposal). MDHHS uses the term GFO. The original proposal plus any additional requests or materials as required by MDHHS-DVS.
Competitive Grant Funding Opportunity (GFO)	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 GFO. Formerly referred to as a Request for Proposal (RFP)
Direct Service Staff	Staff, contractors, or volunteers who are providing grant allowable services/activities directly with clients.
Financial Status Report (FSR)	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 is 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 twice during the 5-year period.
Project	The implementation of a program through a grant agreement.
SAA	State Administering Agency – Term typically used in federal grant special conditions.
UEID	Unique Entity ID

Organization Acronym	**Links**
BISC-MI	Batterer Intervention Standards Coalition-Michigan
CAC-MI	Children's Advocacy Centers of Michigan
MCEDSV	Michigan Coalition to End Domestic and Sexual Violence
MCOLES	Michigan Commission on Law Enforcement Standards
MI-VAN	Michigan Victim Assistance Network
PAAM	Prosecuting Attorneys Association of Michigan
UTFAV	Uniting Three Fires Against Violence

Federal Offices	
Organization Acronym	**Links**
DOJ	United States Department of Justice
FVPSA/OFVPS	Family Violence Prevention and Services Act/Office on Family Violence Prevention and Services
OJP	Office of Justice Programs

OVC	Office for Victims of Crime – Office of Justice Program
OVW	Office on Violence Against Women – Department of Justice
VAWA	Violence Against Women Act
VOCA	Victims of Crime Act

State Offices/Departments	
Organization Acronym	**Definitions**
BGP	MDHHS Bureau of Grants and Purchasing
DVS	MDHHS Division of Victim Services - Division of Victim Services
MDHHS (Department)	Michigan Department of Health and Human Services - Michigan Department of Health & Human Services

State and Federal Computer Systems	
System	**Definitions**
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. Access is available through MiLogin for Business: MiLogin - Login.
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

DVS Boards and Commissions	
Board/Commission	**Links**
Michigan Crime Victim Services Commission	Crime Victim Services Commission (michigan.gov)
Human Trafficking Health Advisory Board	Human Trafficking Health Advisory Board (michigan.gov)
Michigan Domestic and Sexual Violence Prevention and Treatment Board	Michigan Domestic and Sexual Violence Prevention and Treatment Board
Sexual Assault Evidence Kit Tracking and Reporting Commission	Sexual Assault Evidence Kit Tracking and Reporting Commission (michigan.gov)

Who to Contact	
Type of question	**Where to get help**
Grant related questions (allowable costs, grant documents, etc.)	MDHHS-DVS@michigan.gov
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 averyt2@michigan.gov
DVSGMS (IGX) questions	MDHHS-DVS@michigan.gov
Budget modifications/Amendments	MDHHS-DVS@michigan.gov
PMT access and reporting questions	MDHHS-DVS@michigan.gov
Confidentiality or PII breach	MDHHS-DVS-DataBreach@michigan.gov

Grant Administration

Special Conditions

Grantees must comply with the applicable federal Special Conditions. The special conditions reference the recipient or any subrecipient. The recipient is the State of Michigan. Subrecipients include Grantees and any organization for which the Grantee has subcontracted funding for program implementation.

1. The conditions of this award are material requirements of the award. Compliance with any certifications or assurances submitted by or on behalf of the recipient that relate to conduct during the period of performance also is a material requirement of this award.
2. Failure to comply with any one or more of these award requirements -- whether a condition set out in full below, a condition incorporated by reference below, 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. Federal entities may also take other legal action as appropriate.
3. By acceptance of this award, 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
4. Some award conditions and certifications have been stayed by federal court order and are not enforceable unless and until the stay has been lifted.

Organizational Administration

Administrative Oversight

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

1. Assume full responsibility for the day-to-day management of the organization.

2. Administer staff and volunteers in accordance with applicable professional, ethical, and legal principles.
3. Account for and track funding expended as a part of each grant separately.
4. Recruit a staff with a wide range of experiences, skills, and perspectives to best serve the community, clients served, and geographic area the organization serves.

State of Michigan Information Technology Security Requirements

The EGrAMS system requires grantees to mitigate security risks through the following. Grantees must acknowledge compliance with the State of Michigan Information Technology Information Security Policy on each DHHS grant to provide 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.
4. The Grantee understands that after 120 consecutive days of inactivity, when the user attempts to log into their account they will receive a message stating their account has been deactivated, and the user will have to request the account be reinstated by the Project Director.

If the named Project Director has changed, please follow the timelines given in #1 above notifying the DVS grants team at: MDHHS-DVS@michigan.gov.

DVS Required Notifications

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.

Changes in Leadership

Grantees must provide written notification to DVS at MDHHS-DVS@michigan.gov of changes in leadership in the following positions 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 to the following systems:

Position	Requires Change in DVSGMS/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	Only if also holding one of the key roles listed above

Organizational Changes

Grantees must provide written notification to DVS at 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 above)	
Planned interruption or reduction of services	30 days prior (see section above)	
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 • DVSGMS

Organizational Documents

Upload and keep the following documents up to date on the Organizational Uploads section of your DVSGMS (IGX) profile:

- Board of Director's list
- Organizational Chart
- Conflict of Interest (tab on Organization Information page)

Inspection Requirements

Annual health and safety inspections are required at every location in which DVS funded client services are physically provided. Public/governmental buildings where shelter/residential services are not provided do not need an inspection (see chart below). Grantees must maintain a record of completion of inspections for locations where an inspection is required.

Inspections may be done locally by the county, township, or municipality, or by a private company, insurance provider, security company, etc.
Types of inspections will vary by program type.

Examples of inspections include:

- ✓ **Fire inspections**
- ✓ **Security system inspections**
- ✓ **Health department inspections (ex: water testing)**
- ✓ **Building inspections**

Type of Facility	Services being provided at location	Is a health and safety inspection required?
Governmental building (State, Tribal, municipal, etc.)	Non-residential	No
Governmental building (State, Tribal, municipal, etc.)	Residential	Yes
Public buildings (restaurants, hospitals, etc.)	Non-residential	No
Non-Profit organization owned/rented facility *	Residential, Non-residential	Yes
TSH units *	Residential, Non-residential	** Yes, NSPIRE required annually
Type of Inspection	**Mandatory**	**Recommended**
HVAC/boiler (heating and cooling)	*x*	
Health and Safety including:		
Fire	*x*	
Security		*x*
Elevators, if applicable	*x*	
Water testing		*x*
Lead paint, if applicable*	*x* *Only needs to be done once and kept on file*	

* 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.

** HUD has transitioned 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

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 SAM registration-debarment at http:/SAM.gov annually for each grantee.

Licenses to Solicit and Operate

Many DVS grantees are private, nonprofit 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 ALN (Assistance Listing Number (formerly 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 https://www.fsd.gov/gsafsd_sp
- Individuals who apply for grant awards or cooperative agreements from the Federal Government are exempt from this requirement.

Further Resources

DOJ Financial Guide: DOJ Grants Financial Guide 2024 | Welcome to the DOJ Grants Financial Guide | Office of Justice Programs

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 subgrantors) 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.

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.

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.

Releases of information should be unique to the individual victim and circumstances and cannot be presented or completed as 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 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 deciding. 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 clients' personal information. These screening practices serve to protect the organization and its clients. The DVS must also assure that any subgrantees have both written policies.

When it comes to background checks, 'positive' finding indicates the presence of criminal history information

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

A. Staff involved in the hiring process

For purposes of this condition, person "who are or will be involved in activities under this award" specifically includes (without limitation) any and all recipient (or any subrecipient) officials or other staff who are or will be involved in the hiring process with respect to a position that is or will be funded (in whole or in part) with award funds.

B. 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), 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 the Department of Homeland Security (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. E-Verify employer agents can email E-Verify at EVerifyEmployerAgent@dhs.gov. Questions about the meaning or scope of this condition should be directed to OJP, before award acceptance.

Budgeting Salaries

Grantees may have positions that require multiple staff to provide sufficient coverage. In this case, it is not necessary to list each staff person separately in the budget. Staff can be assigned to a single line in the budget. To qualify, the position requires all the following:

- Services provided under the funded agreement need to have the same client eligibility. For example, if there are multiple advocates being combined, all the advocates must work exclusively with clients eligible for services under the grant.
- Position descriptions must be identical.
- Additional information can be found at: FAQ---Budgeting-Salaries.pdf

Non-Discrimination Notices for Employees and Program Participants

Grantees must comply with applicable federal laws and MDHHS contract provisions that prohibit discrimination based on 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. Note that some federal civil rights statutory schemes do not apply to tribal governments or have exceptions built in for tribal governments. 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 on the DVS webpage under Methods of Administration.

Grantees must provide written notification that they do not discriminate based on the above categories. This written notification must be consistent with applicable federal and state laws, and 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 C(starting in FY 2027 Attachment C and Attachment E can be found on one document identified as Attachment C).

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 a 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).
2. A reasonable and equitable distribution method (e.g. allocated to all related activities, including federal awards) is used.
3. Bonus(es) are pro-rated, and documentation is maintained.
4. The retention bonus must be paid from the same grant(s) under which the salary is supported.
5. DVS grant funds may not be 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.

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 organization's 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.
- Includes 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,
    - Job location,
    - Percentage of each funding source(s).

- Includes DVS funded contractual staff, if applicable
- Revision date

Organization charts must be uploaded on DVSGMS/IGX by clicking on your name in the upper right corner, choose Profile > Organization Uploads > upload your Organization Chart in the Organization Chart field > 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.

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.

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. Policy must comply with Federal, state, and local labor laws.

- **On-Call Limitation:** 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.

Grant Policy Requirements

These requirements must be reflected in organizational policies.

Driving Safety Policies

Grantees must follow both state and federal applicable driving-related safety requirements and laws while driving any vehicle while performing work funded by DVS awards, including wearing seat belts and prohibiting texting while driving.

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 § 94.115 (VOCA); 34 USC § 12291(b)(2) (VAWA); 42 USC § 10401 (FVPSA). Confidentiality policies should address client-initiated disclosures (i.e., releases of information), program-initiated disclosures (i.e., exceptions to confidentiality, mandated disclosures), and how the grantee will handle requests for information. Larger entities or umbrella organizations with differing confidentiality requirements (e.g., HIPAA) may elect to develop confidentiality policies specific to the DVS-funded victim service program.

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
- DOJ: FAQ on the VAWA Confidentiality Provision (October 2017)
- NNEDV: Confidentiality Toolkit
- Guidance for Implementation of the Federal Confidentiality Provisions for DVS Funded CACs
- Confidentiality Policy Considerations and Recommendations: A Resource Manual for Michigan Domestic and Sexual Violence Programs see Confidentiality Policy Considerations and Recommendations 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 within 24 hours of discovery of the breach or discovery of conditions that will likely lead to a future data breach. The email 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 PII is available in public sources such as telephone books, public websites, 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 identify. 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 accesses 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, 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 (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.

Some common examples of a breach include:

- Submitting data that includes PII to MDHHS, DVS, or another 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

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)

Recording: Data Breach Notifications & Survivor Confidentiality: https://www.youtube.com/watch?feature=youtu.be&v=6W_cjp_xcXM

Sexual Assault Track Kit Policy

All non-Tribal DVS-STOPL funded Grantees are required to fully implement the use of Track-Kit™. Contact 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 findings 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).

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 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 C.

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 written determination of suitability required for certain individuals who may interact with minors.

Update: Fingerprint-based searches are now legally available in Michigan for those deemed eligible. Beginning January 1, 2026, all DVS-funded agencies deemed eligible by Michigan State Police will be required to complete fingerprint-based searches for new employees as part of the required determination of suitability to interact with minors. Fingerprint background checks will need to be completed for existing employees according to the program update/reexamination policy or within two years, whichever occurs first.

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
  - A fingerprint-based search for pertinent state(s) (or if the recipient or subrecipient documents that a fingerprint search is not legally available – e.g. the individual is contractual and not an employee or volunteer – a name-based search, using current and, if applicable, previous names and aliases).
  - ICHAT for those grantees that Michigan State Police (MSP) has deemed ineligible to conduct fingerprint-based criminal background checks through the Criminal History Research Information Subscription Service (CHRISS). ICHAT and any other non-fingerprint-based checks must include 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 last 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 whether an individual is suitable to interact with minors during 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 considering those search results.

Frequency: Minimum updated searches at least every five years.

Questions regarding Suitability: Grantees/contractors may contact MDHHS-DVS@michigan.gov 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 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, DVS 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 people 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 DVSGMS (IGX) and keep it up to date.

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

1. Using the DVS Grantee Conflict of Interest Disclosure Form on DVSGMS/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. DVS recommends grantees develop a mechanism to maintain documentation that the training has been completed.

Required training courses 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
- Title VI Overview

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 training completed by DVS funded staff and be prepared to provide this record upon request.

DVS allows Grantees to reimburse training and travel costs to attend in-state, out-of-state, and web-based training courses 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 ensure 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. **Confidentiality Webinar Series –**

   Required for: Staff, contractors, subcontractors and volunteers with access to client information.

   Webinar Information: *Confidentiality webinar series*, hosted on Michigan Victim Advocacy Network (MiVAN).

2. **Crime Victims Services Compensation 2023 webinar and Understanding The Confidentiality Requirements Of VOCA, FVPSA, And VAWA (2023) webinar series**

   Required for: All Staff (current and new), contractors, subcontractors and volunteers providing direct client services.

   Webinar Information:
   - *Crime Victims Services Compensation 2023 webinar*, hosted on MiVAN.
     - Or the abbreviated alternative for volunteers found here.
   - *Understanding The Confidentiality Requirements Of VOCA, FVPSA, And VAWA (2023) webinar series*, hosted on 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/CSUP),
   b. Domestic Violence Comprehensive Services (DVCS),
   c. Sexual Assault Comprehensive Services (SACS)/Sexual Assault Focused Services (SAFS),
   d. Transitional Supportive Housing.

4. **National Children's Alliance (NCA) -** Child Advocacy Center staff funded through Children's Advocacy Center grants (CAC/CACS/CACV) must complete initial training consistent with NCA accreditation standards.

5. **Committee on Regional Training (CORT) –** DVS-funded attorneys employed by Michigan Advocacy Program must attend initial training offered by CORT.

6. **Victim Assistance Training Online** - Provided by OVC Training & Technical Assistance Center (TTAC). All staff funded through a DVS Grant not previously listed must complete the modules in the sections indicated below if available. Substitute content may be available on MiVAN if needed for specific modules.
   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

7. **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. (NOTE: Michigan Advocacy Program may exceed this limit to send newly hired attorneys to out-of-state regional training).
- 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 are 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 as determined by Department and funding source requirements.

- ***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 complete an annual non-competitive application including a work plan and budget. The MDHHS-DVS staff will review 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.

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 Grant Funding Opportunities (GFOs). Generally, competitive grants are awarded for a grant period of three to five years. Additional years may be added.

The GFOs 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.

Rating teams will review and evaluate GFO applications based on current MDHHS and BGP policies**.** If awarded funding, successful applicants may be asked to re-submit the final application with any required changes. Once a completed application package is submitted by the subrecipient:

- Budgets are reviewed for accuracy and to ensure that expenditures are within the guidelines of the state and federal requirements.
- 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 GFO documents for more information about grant official roles.
- The DVS risk assessment is completed to determine whether the subrecipient is in the low-, moderate-, or high-risk category.

Federal formula grants awarded to the State of Michigan vary 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 or 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.

Client Assistance

28 CFR 94.119 provides a list of allowable expenses for "immediate emotional, psychological, and physical health and safety" needs other than 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 or 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 perpetrator's 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, the child breaks their glasses, this would not be allowable as there is no direct relation to the victimization, as the child's glasses could have been broken regardless of where they were living.

Client Assistance FAQ

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. Services to Incarcerated Victims

- 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. FAQ---Legal-Services.pdf

Service Animals and Pets

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

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.

VOCA Project/Grant Limitations

VOCA funds may be used only to provide direct services and approved administrative activities. Grantees must provide services to victims of federal crimes on the same basis as to victims of

crimes under State or local law. Grantees may provide direct services regardless of a victim's participation in the criminal justice process. Victim eligibility under this program for direct services is not dependent on the victim's immigration status.

Further Resources
FAQ – Client Assistance: FAQ---Client-Assistance.pdf

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

Reporting and Certifications

Overview of Reporting

Reports are due 30 days after the end of the reporting period (i.e., October reports are due November 30, etc.)

System	Monthly	Quarterly	Semi-Annual	Annual
EGrAMS : Home *All Grantees*	Financial Status Report (FSR)	Work Plan		• Fiscal Questionnaire • FSR Final Report
DVSGMS (IGX) https://milogintp.michigan.gov/	Activity Report (X_1)	Quarterly Activity Report (X_5)	Semi Annual Activity/ Narrative Report (X_3)	• Local Share Report (X_6) • Annual Certifications • Annual Inspection Certification
Other Format Submitted to: MDHHS-DVS@michigan.gov		• CSU Excel Reports (X_2) • Training Data Summary (X4)		
VAWAMEI.org NOTE: Grantee link changes annually and is released in mid-February.				• STOP Annual Progress Report • SASP Annual Progress Report

VOCA Grantees Only				
OVCPMT – VOCA grantees only OJP PMP Login		OVCPMT Quarterly Activity Report		SAR Projections
Survey/Form Link NOTE: Grantee link changes annually and is released in October.				VOCA Media and Client History Report
X_1 Report form on DVSGMS (IGX) for DV, SACS, SANE, STOPC, STOPL, STOPP, STOPV, TSH				
X_2 Report form is an Excel document for some CSU grantees emailed to grantee at the beginning of the fiscal year. Please complete and email to MDHHS-DVS@michigan.gov.				
X_3 Report form on DVSGMS (IGX) for DV, SACS, SANE, STOPC, STOPL, STOPP, STOPV, TSH				
X4 Training grant specific (VOCAT, VAWAT, NSPT)				
X_5 Report form on DVSGMS (IGX) for CAC/CACS grantees.				
X_6 DVCS 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.

DVS Overdue Policy

- **First Overdue notice:** Sent to the organization's Executive Director and/or the Authorized Official if they are not the same person.
- **Second overdue notice:** Sent to the organization's Executive Director, Authorized Official, and to the agency's Board President or Department Leadership. **NOTE: Once an organization reaches this level, all future overdue notices will include a list of ALL reports that are currently overdue.**
- **Third overdue notice:** Sent to the Board President or Department Leadership with a cc: to the Executive Director and/or the Authorized Official. If the issue is not resolved within 30 days, an immediate stop work order can be issued. During this time all activities charged to the grant agreement(s) must be suspended. In accordance with the grant agreement, no activities or additional compensation may be charged to the grant during a stop work period.

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

Annual Certifications via DVSGMS/IGX

Site: https://milogintp.michigan.gov
Due: Annually

- Civil Rights Requirements
- EEOP Requirements
- Educational Programming

- Religious Institutions and Organizations
- STOP Grant Requirements (STOP grantees only):
  - Sex-Segregated/Sex-Specific Services
  - PPO Requirements
  - Prohibition of Services that Compromise Victim Safety
  - Certification of Grant Requirements
- Lobbying Certification
- Debarment & Suspension
- Drug-Free Workplace
- DVS Grant Agreement
- DVS Grantee Guidelines
- Understanding of Methods of Administration
- Local Share Report
- Inspection Certification
- Conflict of Interest Policy and Disclosure Form
- Organizational Chart
- Organization's Board List (if applicable)

Organization Certification

Annual Submissions via EGrAMS

Site: EGrAMS : Home

Due: Annually – 90 days after the start of an Agreement

- Fiscal Questionnaire

VOCA Eligibility

VOCA Eligibility is verified as follows:

Current Grantees: EGrAMS Rollover Application – Annually
New Grantees: RFP/GFO or equivalent – At grant initiation

Grant Funding and Financials

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
    - Antiterrorism and Emergency Assistance Program (AEAP)
  - 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 Sustainability Fund (CVSF)

The Office of Victims of Crime

- Victims of Crime Act (VOCA)

DVS Funding Information/Payments

Grant Disbursements

Grants are disbursed on a reimbursement-only basis, based upon actual costs that have been incurred and expended. For example: Supplies are purchased, then the agency submits payment for supplies, collects receipts, and submits for reimbursement.

Grantees will be reimbursed in accordance with Department regulations and the terms of the Grant Agreement, reports, records, and requirements of the specific funding source.
The MDHHS Bureau of Finance & Accounting provides a *Subrecipient and Contractor Payment Confirmation* website at: MDHHS - Contractor and Subrecipient Resources (michigan.gov). The website includes the Subrecipient Payment information and Contractor Payment information which will be updated quarterly. The website also includes instructions and report column definitions to help users navigate the information.

Financial Grant Management

Award Match Requirements

DVS-administered grants may require matching funds.

DHHS Sponsored Match: In some cases, DVS may match on behalf of an entity and not pass the match on to subrecipients.

Grantee Match: Federal grant programs may require that the sub-recipient support a percentage of their project with non-federal cash or in-kind resources.

Match Waiver: Some federal funds allow DVS to award match waivers for awards that require Grantee match.

Match may be required for the following grant series:

- The STOP (Services, Training, Officers, and Prosecution) grant requires that the state provide a 25% non-federal match on the total award given to the state.

  Calculating STOP Match
  Reporting STOP Match

- The Family Violence Prevention and Services Program (FVPSA) grant requires that the subrecipient provide at least 20% of the project costs.
  Calculating FVPSA Match
  Reporting FVPSA Match

- VOCA requires subawards to be matched at 20 percent of total project costs unless a match waiver has been granted.

  Calculating VOCA Match
  - Starting with the total project cost, a $125,000 total project would be multiplied by 20 percent to determine the amount of match that is required. $125,000 * 0.20 = $25,000. The VOCA share is the total project cost minus match, $125,000 - $25,000 = $100,000. Starting with the VOCA share, the user would first determine the total project cost by dividing the VOCA amount by 100 percent minus the 20 percent required match, as shown: $100,000 / (1.0 – 0.20) = $125,000.

  - Then, as above, the total project cost would be multiplied by the match percentage to determine the required match. $125,000 * 0.20 = $25,000. A shortened calculation would also work by multiplying the VOCA share by 0.25 to determine the match amount. $100,000 * 0.25 = $25,000.

To calculate match:

Correct Match Calculation

VOCA subrecipients must calculate required match using the following method:
Required Match = Federal Award Amount × 0.25
This ensures that the non-federal match constitutes 20% of the **total project cost**, as required by VOCA.

Example:

- Federal Award Amount: $100,000
- Required Match: $100,000 × 0.25 = **$25,000**
- Total Project Cost: $125,000 ($100,000 federal + $25,000 match)

Incorrect Calculation to Avoid

The following method is **non-compliant** and may result in underreporting:

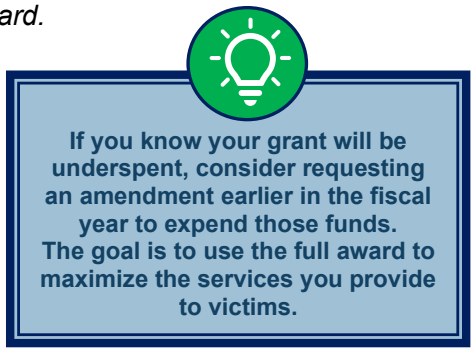
Federal Award Amount × 0.20 = $20,000 → ❌ **Incorrect**

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. A grant Amendment may be required.

The purpose of budget revisions is to reallocate funds among existing line items in an approved contract budget, 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 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 no 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.
- There is 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.
- DVS Grants and Contracts 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 the Grant Agreement Budget in EGrAMS.
- Authorized Official must submit amended agreement for DVS/MDHHS approval and then must sign amended agreement to finalize changes.

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 an 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 MDHHS-DVS@michigan.gov 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

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.)

Schedule of Expenditures of Federal Awards

The Schedule of Expenditures of Federal Awards (SEFA) is a requirement when undergoing a single audit. Your auditor may request that you pull this report for them. It is also important to know what funding supports each of your organization's DVS grants. The funding varies by grantee and grant. This means that the neighboring programs grant with the same acronym could be funded through a different funding source.

Why is it important?

- **Federal requirements –** Requirements are attached to each federal funding source. In accepting a grant, your organization is responsible for complying with these requirements.

The SEFA identifies the funding identified to support your organization's grant(s). It is possible that that will change during the year and may not be reflected on the SEFA. Grantees can find accounting, financial reporting, and compliance requirements per their agreements with Michigan Department of Health and Human Services. This site is updated quarterly: https://www.michigan.gov/mdhhs/doing-business/contractor

Where do we find the information?

The funding information can be pulled directly from EGrAMS. Grantees can access the data by using the following drop-down menus: Grantee > Grant Application > Sched of Fin Assistance and click the Go button.

1. Click the Generate button,
2. Enter the grant fiscal year that you want,
3. Select the Grant Program. If you are using the "Lookup" icon to search for a grant program, be sure to include the percentage sign on each end (e.g., %DV%, %CACV%, %TRBVS%), Agency – EGrAMS displays your organization's information,
4. Click the OK button and a message will show successful generation,
5. Click the Review button
6. Click the Find button.

DHHS Contractor and Subrecipient Resources Website

Link to the website: Contractor and Subrecipient Resources (michigan.gov)
Grantees can find accounting, financial reporting, and compliance requirements per their agreements with Michigan Department of Health and Human Services. This site is updated quarterly.

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)

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 the 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.

Gift cards used as incentives for completing satisfaction surveys allowable in CVSF grants only.

- Organizational policies must include the mechanism for distribution that includes all restrictions listed above.
- Gift cards used as incentives may not exceed $25.

Comingling of Funds

DVS Grant Agreements (Attachment C) 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.

Procurement by Tribal Governments and Tribal Entities

For federally recognized Tribal governments and Tribal entities, purchases of goods or services from the Tribe or tribally affiliated organizations may be allowable when the costs are reasonable, necessary for the performance of the grant, and consistent with market rates for comparable goods or services. If a tribally affiliated provider is the only reasonably available option within the geographic area, the grantee must maintain documentation supporting that determination. Grantees must ensure that all expenditures are adequately documented, consistently applied, and compliant with applicable federal and state grant requirements.

The Procurement Certification Form is required for any purchase of service/equipment with a unit cost of $10,000 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 (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: Please upload receipts to the FSR on which reimbursement is being requested.

2. Grantees must maintain a readily identifiable inventory of nonexpendable personal property purchased in whole, or in part, with these funds that costs $10,000 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 FY2024: 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.

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

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.

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 include review of monthly FSRs, review of semi-annual reports, review of various reports, review of 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 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 walkthroughs 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.

Comprehensive 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 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 110 to 131 standards (depending on TSH and SANE) that have been identified and broken into the following nine sections:

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

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.

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.

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. While 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 considers 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

- 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
- Failure to make any mandatory reporting to federal funding sources

Level 1 DVS Actions/Rationale

These actions are determined and approved by the Quality Assurance Director. Although these actions may involve consultation with the Director of Grants and Contracts and DVS Director, 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

These actions are recommended by the Quality Assurance Director and require approval from the Director of Grants and Contracts and DVS Director.

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 because 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 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 by DVS that the original award amount was unreasonable based upon actual services provided.
- **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.

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)

Policy Requirements

Background Check Policy

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

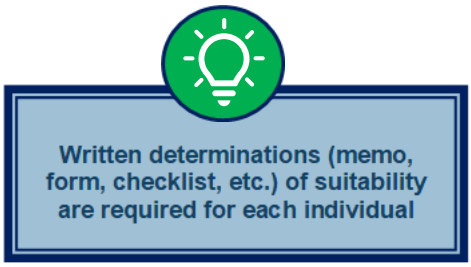
Criminal Background Check Policy

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. Grantees may consider the recency and type of crime when deciding. Failure to comply with this provision may be cause for immediate cancellation of this Agreement. In addition, Grantees 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. Grantees must also assure that any subcontractors/subgrantees have both 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 above, MDHHS may require repayment of any and/or all billed services for the period that the required checks had not been completed.

Suitability of Working with Minors Policy

DVS Grantees or contractors are required to have an updated policy and processes in place regarding the written 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-based 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)

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 whether an individual is suitable to interact with minors during 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.

Grantees/contractors must update the background check searches described above at least every five years and reexamine the covered individual's suitability determination considering those search results.

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 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

Certification of Exemption for Hiring Practices Based on 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

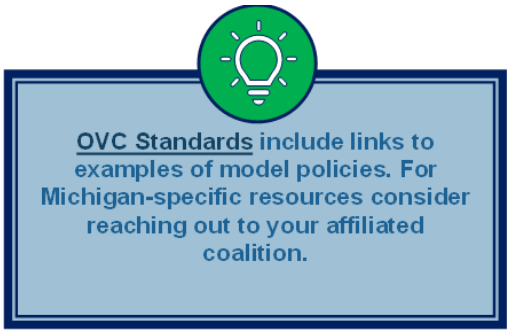
- MDHHS Grant Agreement: *General Provisions – Conflict of Interest and Code of Conduct Standards*
- 1968 PA 317, as amended *Contracts of Public Servants with Public Entities*
- 1973 PA 196, as amended *Standards of Conduct for Public Officers and Employees*
- 2 CFR § 200.318 (c) (1) and (2) Procurement Standards – *General procurement standards*

- DOJ Financial Guide*:* Post Award 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. Employees and clients must be informed that they may file civil rights grievances against grantees directly with MDHHS/DVS. The Grantee will promptly provide notice to the DVS Contract Manager of any complaints of discrimination made against the Grantee. MDHHS Grant Agreement, Attachment C: *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 Office on Civil Rights (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 Utilization Report portion of your plan to the Office for Civil Rights.

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 individual programs on indirect costs. Grantees with questions are encouraged to consult with independent accountants.

- DOJ Financial Guide: Post award Requirements – Indirect Costs
- 2 CFR § 200.414 Indirect (F&A) costs.

Limited English Proficiency Plan

- MDHHS Grant Agreement, Attachment C: 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 C: 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.

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 C: *Division of Victim Services Grant Requirements: Program Specific Requirements*

Time and Effort Reporting

- MDHHS Grant Agreement, Attachment C: *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?
Federal Civil Rights Training	https://ojp.gov/about/ocr/ocr-training-videos/video-ocr-training.htm	Annually
Crime Victim Compensation Trainings	MiVAN: Michigan Victim Advocacy Network - MiVAN	Initial hire period

OJP Required Trainings		
Overview of Civil Rights and Laws	Office for Civil Rights — Training for Grantees | Overview | Office of Justice Programs (ojp.gov)	Annually
Limited English Proficiency Overview	Office for Civil Rights — Training for Grantees | Limited English Proficiency Overview | Office of Justice Programs (ojp.gov)	Annually
Service to LEP Person	Office for Civil Rights — Training for Grantees | Service to LEP Persons | Office of Justice Programs (ojp.gov)	Annually
Faith Based Organizations (if applicable)	Civil Rights Office | Partnerships with Faith-Based and Other Neighborhood Organizations | Office of Justice Programs (ojp.gov)	Annually

American Indians (If applicable)	Office for Civil Rights — Training for Grantees | American Indians | Office of Justice Programs (ojp.gov)	Annually
Standard Assurances	Office for Civil Rights — Training for Grantees | Standard Assurances | Office of Justice Programs (ojp.gov)	Annually
Title VI Overview	Office for Civil Rights — Training for Grantees | Title VI Overview | Office of Justice Programs (ojp.gov)	Annually

Other Training Requirements		
New Service Provider Training or equivalent (domestic violence and sexual assault grants only)	In person. Calendar of upcoming trainings can be found at: https://mcedsv.org/training-ta/training-calendar/	Required when initially hired
Child Advocacy Centers funded through Children's Advocacy Centers (CAC/CACS/CACV)	National Children's Alliance (NCA).	Required when initially hired
All staff funded through a DVS Grant not previously listed	Victim Assistance Training Online, provided by OVC Training & Technical Assistance Center (TTAC).	Required when initially hired
Confidentiality Webinar Series	MiVAN Michigan Victim Advocacy Network - MiVAN	• All staff must attend revised training for FY 2025. • All new employees.

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 is it 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	Guidelines, Forms and Resources (michigan.gov)
Procurement Certification Form	Form required when purchasing items/services with a unit cost of $10,000 or more.	Guidelines, Forms and Resources (michigan.gov)

MDSVPTB TANF Form	Determining TANF eligibility for DVCS and TSH Grantees.	Will be posted to the DVS Website when released Division of Victim Services (michigan.gov)
AEAP/AEAPM Reporting Form	Form used to report information on AEAP/AEAPM services provided.	AEAP-Report.xlsm

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

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
FY 2026 Grantee Guidelines and Policy Manual	7-2025
FY 2026 Grantee Guidelines	7-2026

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