MONTANA BOARD OF CRIME CONTROL TRAINING OPPORTUNITY

Dear Subscriber,

MBCC provided Subgrantee Training on October 6, 2022. Many of you were in attendance in-person and via zoom. We had a lot of information to present and trying to relay it all during the 6-hour period was a challenge. I will try to highlight as much as I can in this email for all who were not in attendance, and for those that would like to recap the training.

Travel:

- Even though grant money may be federally funded, when traveling in-state, subgrantees must use state of Montana reimbursement rates: <u>https://mbcc.mt.gov/ docs/Funding/Forms/Financial/Travel Information Summary Sheet-revised-July-2022.pdf</u> Travel request forms must be filled out and submitted for reimbursement. They are available on the MBCC website.
- Out-of-State travel must be authorized by the MBCC grant manager, even if it was approved in the grant budget. It is essential that any out-of-state travel fits within the program goals and objectives outlined in the application. Please request permission to use grant funds for out of state travel using the following form: https://mbcc.mt.gov/docs/Funding/Forms/Travel/Request-and-Justification-of-Out-of-State-Travel-Form.xlsx Please email the completed travel request forms to your grant manager. If you have not heard back from anyone about it, please feel free to check in about the status of the request.
- Grant funds will not pay for travel insurance or tips. Airfare costs should be the basic, least expensive unrestricted accommodations class offered by commercial airlines.
- Travel times need to be done within a reasonable time frame of a conference or training starting and ending. MBCC will not require traveling on "red eye" flights. The next reasonable flight time is okay. Also, advanced travel requests for flight costs are not allowed, only after the flight has taken place.
- MBCC has received requests for reimbursement of vehicle repairs and/or new tires. This is not an approved request. Mileage rates reimbursed include "wear and tear" for the vehicle.

Gift/Gas/Prepaid Cards:

• To be reimbursed for gift cards, prepaid cards, and gas cards, subgrantees **must** use a tracking log and submit them as they are purchased and when used within the grant period. If you purchase 10 gift cards in the first quarter but only use 2, you request for the reimbursement of all 10 but must track on the tracking log where the 2 that were used went and that 8 cards remain unused. You have until the end of the grant period to use the other 8 and track them on the log as they are used. If any gift cards are not used by the end of the grant period, MBCC will request the money spent on the unused cards to be returned. If tracking logs are not used and submitted, grantees will not be reimbursed for the costs. These cards are treated as cash and need to have detailed information logged about their use. Please review the full procedure,

here: <u>https://mbcc.mt.gov/_docs/Funding/Subgrantee-Resources/Subgrantee-Use-of-Prepaid-Cards.pdf</u>

Signature Page:

- The Project Director, Financial Manager, and Official Budget Representative must be employees of the grantee agency. Contractors/consultants cannot be in these positions.
- One person cannot have more than one position authority on the signature page. Internal controls must provide that one person cannot authorize themselves in a grant expenditure or act.
- The signature page is used as primary contact for all important business communications from MBCC. MBCC contacts the individuals listed on the signature page when scheduling a site visit.

Accepting your Award:

- MBCC uploads your award into AmpliFund and then tasks are assigned to the subgrantee to complete. Try and accept your award within 30-45 days if possible so you can start drawing funds. If you accept the award late, all the funds may not be spent on time which may lead to GANs being needed or even a grant extension.
- All projects are required to start within 60 days of the start of the grant period or it is at risk of being cancelled. If it can't be done within the required amount of time, reach out to MBCC and communicate what is going on to cause the delay. Without signed award documents, no reimbursements can take place.
- If you have any issues or questions, feel free to contact us or use the AmpliFund resource page on the MBCC website under recipient resources. The following guide will show you step-by-step on how to complete and navigate your award in AmpliFund: <u>https://mbcc.mt.gov/ docs/Funding/Training-Technical-Assistance/Amplifund/AwardLettersAndOutstandingAwardDocuments.pdf</u>

Special Conditions:

 MBCC receives special conditions when awarded funds from federal grants. MBCC then passes down Special Conditions to the subgrantees. These are very important and should be read and understood thoroughly before accepting the award. Every page of the special conditions is initialed by the sub-grantee stating they have been read and understood. The special conditions are how the grant is to be handled by the subgrantee and MBCC. If anything on the special conditions is not understood, please reach out to MBCC staff.

Quarterly Reports:

• NEW DUE DATE! All quarterly reports are now due 15 days after the calendar quarter (used to be 10 days). This gives 5 more days to get the required information submitted. Only the final FINANCIAL report is now due no later than 45 days after the final quarter reporting period. This allows more time to get everything reported for the end of the grant. If subgrantees do not complete reporting periods as required, the grant becomes subject to having funds put on hold and having to appear in front of an Application Review Board and petition for the grant to be reinstated.

Policy requirements:

• As MBCC conducts site visits and monitoring, the most common update for the subgrantees are adding the Language English Proficiency (LEP) policies and procurement policies. If you want to be proactive and work on these, you can start with sample policies by reaching out to MBCC grant management staff.

Risk Assessment and Monitoring:

• The Risk Assessment needs to be filled out by the subgrantee. MBCC uses this tool to prioritize what is monitored and to assist with finding issues that may need special attention. The goal is to ensure compliance for everyone involved. When MBCC visits on the day of the site review (after giving up to 45 days' notice and providing the information of what we will be monitoring) we will visit with the people listed on the signature page as well as staff funded by the grant. All the forms to be used in the monitoring will be sent to the sub-grantee the day after establishing a date for the visit. This allows the subgrantee time to review the information and ask any questions ahead of the site visit. MBCC will want to talk with individuals who do the work on the grant even though their names may not appear on the Signature Page.

VOCA SPECIFIC:

- A question was asked on the Performance Management Tool (PMT) reporting site timing out, it was advised that MBCC has no control over the auto time outs on the PMT report site or AmpliFund site.
- The new VOCA subgrants that start with 23-V01-xxxx, have been unable to report their data in PMT. These subgrantees will be a quarter late in PMT reporting because the new grant award number for 2022 has not been updated in the system by our federal partners. Once the grant number for 2022 has been updated in the system, SARs will be input, and this will trigger the sub-grantees to start reporting. Your grant manager will be communicate information regarding the PMT data.
- There is no delay for any other PMT reporting for other subgrants.
- Federal rules requires VOCA grants to have volunteers. This is a requirement for VOCA subgrantees. If you need further information, please reach out to MBCC staff.
- When site visits are conducted for VOCA grants, MBCC wants to talk with volunteers (if available) and will need to see the policies on how volunteers are trained.

Reimbursement Request and supporting documents:

- It was explained why personnel timesheets are required and must have either an approved signature or time stamped signature (PDF) from an authorized timekeeper. MBCC is audited and is required to provide the federal auditor time sheets when they ask for them. If time sheets are not provided at the time of the ask, 5 years later when an audit may occur, the ability to get a time sheet from the sub-grantee may be very difficult or may even be unavailable due to turn over or lack of access by the current person available. When submitting payroll summaries and time sheets for reimbursement, please do not include employee protected information (PII- SSN's and DOBs, etc. Even the last for SSN numbers is not wanted).
- If you have multiple subgrants, each must have their own expenditures separated out and not included/co-mingled within the multiple grants. Each grant expenditures need to be distinguishable.
- MBCC reviews and operates strictly on the Code of Federal Regulations and the DOJ Financial Guide. Please review the following links: <u>https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-</u> <u>200</u> (2CFR) <u>DOJ Grants Financial Guide (ojp.gov)</u> federal financial guide.
- For any assistance submitting for reimbursement, reach out to your financial grant manager, they would be happy to help and guide you.
- For step-by-step instructions on how to creating expense entries, reporting periods, and submitting payment requests, please review the following



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