

Subgrantee's Subaward Agreements: Responsibilities and Requirements

WI DOJ VOCA subgrantees that subaward funds to another agency to carry out a portion of the VOCA funded project are solely responsible for managing and monitoring the subaward. This document provides a summary of the requirements and responsibilities detailed in the DOJ Grants Financial Guide section 3.14 Subrecipient Management and Monitoring.

SUBAWARD AGREEMENTS

Any direct WI DOJ VOCA subgrantee is required to include the following on their subaward agreement:

- Federal award information
- detailed budget,
- date(s) of service(s),
- service(s) provided, and
- applicable compliance requirements must be clearly identified in the subrecipient award agreement. Such as:
 - Audit Requirements
 - Reporting requirements and due dates
 - Please note: Due dates should allow WI DOJ VOCA subgrantees sufficient time to review and process subaward reports and meet OCVS report dues.
 - Fiscal Reports/Reimbursement Requests
 - Programmatic and/or statistical reports

Additional required information can be found under Subrecipient Agreements on pages 116 and 117 of the [DOJ Grants Financial Guide](#).

SUBAWARD MONITORING

WI DOJ VOCA subgrantees are required to monitor their subawards. The requirements for subaward monitoring can be found in [31 U.S.C. § 7502](#) and in [Title 2 C.F.R. § 200](#) (including, but not limited to, the sections on “Subrecipient Monitoring and Management” contained in Subpart D and audit requirements applicable to subrecipients contained in Subpart F). Additional requirements can be found in the [program legislation \(VOCA Rule\)](#), [VOCA State Program Guidelines](#), and the terms and conditions of the award. To maintain compliance, WI DOJ VOCA Subgrantee should mirror OCVS monitoring when monitoring subaward.

WI DOJ VOCA subgrantees must have systems, policies, and procedures to ensure that subaward monitoring is conducted in accordance with Federal, State, and VOCA program and grant requirements, laws, and regulations.

SUBAWARD MONITORING MINIMUM REQUIREMENTS

Written Policies: WI DOJ VOCA subgrantees must have established written policies on subaward monitoring, as described in [2 C.F.R. § 200.331](#). The WI DOJ VOCA subgrantee is required to monitor the subaward's use of Federal funds during the program period and risk of non-compliance.

- Risk Assessment: OCVS recommends that WI DOJ VOCA Subgrantees conduct a Risk Assessment of the subawarded to determine the level of monitoring required.

- Types of Monitoring: Monitoring can include regular communication with subrecipients, and appropriate inquiries concerning program activities; performing subaward site visits to examine financial and programmatic records and observe operations; and reviewing detailed financial and program data and information submitted by the subaward. However, when no site visit is conducted, the WI DOJ VOCA subgrantee should be familiar with the subaward's financial operations and procedures, as well as their maintenance of current financial data such as timesheets, invoices, contracts, and ledgers that tie back to financial reports.
- Audits: WI DOJ VOCA subgrantees need to develop procedures to ensure that subrecipients expending \$750,000 or more in Federal awards during the subrecipient's fiscal year, submit the required completed audit to the VOCA subgrantee within 9 months after their year-end or one month after the issuance of their audit. See [US DOJ Financial Guide 3.19 Audit Requirements](#).

REMEDIES FOR SUBAWARD NONCOMPLIANCE

If a subaward fails to comply with Federal, State, and VOCA statutes, regulations, or the terms and conditions of a Federal award, the WI DOJ VOCA subgrantee may impose additional conditions. However, if it is determined that noncompliance cannot be remedied by imposing additional conditions, the WI DOJ VOCA subgrantee may take one or more of the following actions listed on page 119 of the [DOJ Grants Financial Guide](#).