

# Pass throughs and administrative funds

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THURSDAY, APRIL 20, 2017

OFFICE ON VIOLENCE AGAINST WOMEN (OVW)

# 28 CFR 90.11(d)- pass through administration

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- STOP funding may be administered by state office staff or other means including pass throughs
- Reporting of subgrantee activities must be equivalent to if state was administering directly
- Effective system of monitoring subawards
- Total sum of administrative funding (10% STOP, 5% SASP) must cover both state and pass through

## 90.17(b) administrative costs

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Must be used for costs directly associated with administering the STOP program

- Salaries and benefits of staff
- Training of staff
- Monitoring compliance
- Reporting
- Program evaluation

# 90.17(b) cont.

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Costs directly associated:

- Audit costs
- Tech costs- such as grant management systems
- Strategic planning
- Collaboration
- Publications
- Program improvements
- Memberships in organizations that support the administration of the program (but not lobbying) (note- not required)

## 90.17(b) cont.

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Where allowable admin costs are allocable to both STOP and another program, the STOP program may be charged no more than its proportional share.

# STOP admin funds

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Are taken from each allocation:

- Victim services
- Law enforcement
- Prosecution
- Courts
- Discretionary

One option is for states to pass through the portion affiliated with the specific allocation that is being passed through

# Effective date

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New rules on this issue take effect with 2017 grants

# Difference between administration of formula funds and administrative overhead

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- Any costs associated with administering formula funds must be within the allowance for the state – for example, issuing a solicitation, holding a review process, and monitoring subgrantees
- If the pass through has grants for another purpose- for example a law enforcement training then they can allocate direct costs and it is not within the allowance



# 2 CFR 200.331 requirements for pass through entities

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Ensure that every subaward is clearly identified (specific information is listed)

Evaluate every subrecipient's risk of noncompliance

Consider imposing specific special conditions based on risk (see 200.207)

Monitor the activities of the subrecipient

Depending on level of risk, consider the following monitoring tools:

- Training and TA on programmatic issues
- On site reviews
- Agreed upon procedures

# 2 CFR 200.331 requirements for pass through entities

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- Verify that subrecipients meet the audit requirements
- Consider whether results of monitoring require adjustments to the pass through's records
- Consider enforcement action (see 200.338)

# Example 1

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State A passes their court funds to the state Administrative Office of the Courts. The AOC uses some funding for statewide judicial training and passes some to local courts for domestic violence courts

1) Is this a pass through?

- A) yes
- B) no
- C) partially

# Example 1, cont.

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State A passes their court funds to the state Administrative Office of the Courts. The AOC uses some funding for statewide judicial training and passes some to local courts for domestic violence courts.

The court allocation is \$1,000,000. The training project uses half of the funds and the rest goes to local courts. The training project has a full time coordinator and also uses 10% of the Director. There is also a contract manager and he is 50% on the STOP program. The other 50% is on the same type of grants (for domestic violence courts) but with state money.

Which of these people are included in admin costs and to what extent?

- A) all of them
- B) none of them
- C) The court can use up to \$100,00 of the contract manager's salary
- D) the court can support 50% of the contract manager's salary

# Example 2

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State B passes their victim services funding to their dual state coalition. They also give funds to the coalition for law enforcement training. The coalition gets \$1,000,000 for victim services plus \$20,000 for the law enforcement training. They give \$700,000 to the shelters in the state and keep \$200,000 for training and TA. They also keep \$100,000 to support a contract manager who issues the subgrant solicitation and monitors the subgrantees.

How much of this award is “pass through”?

- A) \$1,000,000
- B) \$700,000
- C) \$1,020,000

# Example 2, part 2

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State B passes their victim services funding to their dual state coalition. They also give funds to the coalition for law enforcement training. The coalition gets \$1,000,000 for victim services plus \$20,000 for the law enforcement training. They give \$700,000 to the shelters in the state and keep \$200,000 for training and TA. They also keep \$100,000 to support a contract manager who issues the subgrant solicitation and monitors the subgrantees.

How much of this funding is for “admin” costs of the program?

- A) \$1,000,000
- B) \$100,000
- C) \$300,000

# Example 2, part 3

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State B passes their victim services funding to their dual state coalition. They also give funds to the coalition for law enforcement training. The coalition gets \$1,000,000 for victim services plus \$20,000 for the law enforcement training. They give \$700,000 to the shelters in the state and keep \$200,000 for training and TA. They also keep \$100,000 to support a contract manager who issues the subgrant solicitation and monitors the subgrantees.

Given the answer to the previous question (that \$100,000 is admin), is this within allowable limits:

- A) yes
- B) no
- C) it depends

# Questions?

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# To contact us:

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