



Virginia Board for  
**People with Disabilities**

# **GRANTS MANUAL**

(Revised January 2015)

**Mission:**

**To create a Commonwealth that advances opportunities for independence, personal decision-making and full participation in community life for individuals with developmental and other disabilities.**

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This manual expresses the minimum requirements for Board grantees and is not an all-inclusive document on the management of a federal grant. Grantees are responsible for adhering to all federal, state and agency regulations and policies applicable to this grant. Please refer to Appendix A for a list of governing documents.

# GRANTS MANUAL

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## I. Overview

The Board is authorized under the Developmental Disabilities Assistance and Bill of Rights Act (the “Act”) of 2000 (P.L. 106-402) to receive federal funds and act as an agent for systems change, capacity building and advocacy on behalf of people with developmental disabilities and their families.

In general, the term “developmental “disability” means a severe, chronic disability of an individual that:

- (i) is attributable to a mental or physical impairment or combination of mental and physical impairments;
- (ii) is manifested before the individual attains age 22;
- (iii) is likely to continue indefinitely;
- (iv) results in substantial functional limitations in 3 or more of the following areas of major life activity:
  - (I) Self-care; (II) Receptive and expressive language; (III) Learning; (IV) Mobility; (V) Self-direction; (VI) Capacity for independent living; (VII) Economic self-sufficiency; and
- (v) reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

Also, an individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting 3 or more of the criteria described in clauses (i) through (v) of subparagraph (A) if the individual, without services and supports, has a high probability of meeting those criteria later in life.

The funding source for the Board’s Developmental Disabilities (DD) grant program is the Department of Health and Human Services, Administration for Children and Families, Administration on Intellectual and Developmental Disabilities. The Catalog of Federal Domestic Assistance (CFDA) number is 93.630. The Board has the discretion to allocate these funds through a competitive grant process, solicitation of work, direct expenditure or a combination of these approaches. **The Board is bound to grant awards only to the extent that the funds are or become available.**

### What We Fund:

The Board promotes, through **systemic change, capacity building** and **advocacy activities**, the development of a person- and family-centered, comprehensive system with a coordinated array of services, supports and other assistance designed to achieve independence, productivity and integration and inclusion in the community for individuals with developmental disabilities. The primary objective of Board-funded projects is to develop consumer-driven model programs that show effective approaches to a particular need, are or can be self-sustaining, and redirect or expand the scope of existing community programs. In addition to service demonstration

projects, the Board may fund, consistent with federal law, projects related to: outreach; training; technical assistance; supporting and educating communities; interagency collaboration and coordination; barrier elimination, systems design and redesign; coalition development and citizen participation; or informing policymakers. Please refer to the Board's website for descriptions of current projects.

The Board **does not fund**:

- existing activities; i.e., those that are a part of an organization's current program or operating budget;
- capital projects that include the acquisition of land or buildings, new construction or major repair;
- any project that would supplant existing federal, state or local dollars to conduct such a program or project, or which is mandated to be performed by an agency of federal, state or local government.

The Board's five year *State Plan* (available on our website at [www.vaboard.org](http://www.vaboard.org)) outlines the Board's goals and objectives in the following federal areas of emphasis: Education, Employment, Health, Housing, Community Supports, Transportation and Quality Assurance. The Board also releases an *Assessment of the Disability Services System in Virginia* (available on our website at [www.vaboard.org](http://www.vaboard.org)). The grants that the Board will fund must advance the *State Plan* goals and objectives and *Assessment* recommendations.

The Board submits a Program Performance Report (PPR) annually to its federal oversight agency, the Administration on Intellectual and Developmental Disabilities. The report includes a summary of all projects and activities conducted during the year, including projects implemented by Board grantees. In addition, the Board reports the cumulative total of "Performance Measures" for all projects and activities. These measures are used to determine the Board's success in meeting its goals and objectives, and are used by the federal oversight agency in performance reports to the administration and congress. The Board's grantees are required to regularly collect and report data on performance measures. Appendix B provides background information on Performance Measures by Area of Emphasis.

## II. Eligibility

Eligible awardees for the Board's Competitive Grant Program may be state or other public agencies, non-profit organizations or for-profit organizations. The Board's Solicited Grant Program is limited to state agencies and universities. No organization may participate in the Board's grant projects in any capacity or be a recipient of federal funds designated for a project if the organization has been debarred, suspended or otherwise found to be ineligible for participation in Federal assistance programs.

### **III. Types of Grant Programs**

The Board has two types of grant programs: Competitive and Solicited. Funding recommendations are made by a grant review team comprised of Board members with a final determination made by the full Board. All grants are subject to the same administrative, program and financial requirements.

#### **A. Competitive Grant Program**

The Board develops and distributes Requests for Proposals (RFPs) for its Competitive Grant Program, usually on an annual basis. The RFPs are specifically designed to achieve the goals and objectives of the Board's State Plan. The program has a 2-step application process that includes the applicant submitting a letter of interest and, if selected by the grant review team, submitting a grant proposal. The competitive nature of these grants requires extensive review of all proposals.

#### **B. Solicited Grant Program**

The Board may identify projects for which specialized expertise or experience may be needed to accomplish specific objectives in the State Plan. In these cases, the Board may solicit a proposal from a state agency or university. Solicited proposals may occur at any time.

#### **C. Continuation Funding for Multi-Year Grant Recipients**

The Board may award multi-year grants when the scope of work requires more than 18 months to complete a project in accordance with the Board's State Plan. Continuation funding is not automatic and multi-year grantees are required to submit a continuation request. The Board will provide a written notification of the requirement to submit a request for continuation to the grantee.

Continuation requests must contain the following:

- Annual project accomplishments and progress toward the objectives, activities, outcomes and performance measures defined in the approved proposal;
- Strategies and activities for accomplishing the project objectives; and
- Responses to project specific questions and concerns, if specifically requested by the Board.

The grantee will submit the request to the VBPD Program Manager prior to the end of a 12 month period for review by the appropriate Standing Committee and full Board. The Standing Committee will review the request, along with a review of the financial management of grant funds and compliance with reporting requirements, and make a recommendation for continuation funding to the full Board.

## **IV. Terms, Conditions, Assurances & Certifications**

By acceptance of a grant award, the grantee agrees to comply with the terms and conditions set forth below. Failure to comply with these terms and conditions may result in the loss of funds and may be considered grounds for the suspension or termination of a grant.

### **A. General Terms and Conditions**

- 1) Grantees must comply with all federal, state and agency regulations, policies and procedures. (See Appendix A.)
- 2) The Board has the authority to make unilateral amendments to the grant requirements to conform to state or federal statutes, regulations, directives or the availability of funds.
- 3) The recipient type for grantees awarded federal funds through the Board is that of a subgrantee/subrecipient as defined in OMB Circular A-133, Section 210, Subrecipient and Vendor Determination. (Please note that in Board literature, subgrantees/subrecipients are referred to as “grantees”.) In very rare instances, an entity may be determined to be a vendor relationship that provides goods and services for a program. Based on the characteristics of the program as defined in Section 210, the Board will make the determination of recipient type which will be stated in the contract.
- 4) Unless otherwise specified in the terms of the DD grant, when copyrightable material is developed in the course of the project, the grantee is free to copyright the material or permit others to do so. However, the Board and the U.S. Department of Health and Human Services shall retain royalty-free, non-exclusive and irrevocable rights to reproduce, publish or otherwise use, and to authorize others to use the material developed under the grant.
- 5) All printed materials and audiovisual products must contain an Acknowledgment Statement formally acknowledging the Board and Federal Developmental Disabilities program for financial support and clearly stating the percentage funded. The

Acknowledgment Statement must include the Board's logo and be prominently presented on all products developed under the grant.

- 6) Unless otherwise specified in the terms of the DD grant, all sub-contractors of grantees will adhere to the provisions of this Grant Manual. Grantees will be responsible for ensuring the acceptance and compliance of all sub-contractors. Grantees will also ensure that subcontractors submit prompt invoices within 30 days of delivery of services and the Grantee will pay the subcontractor within 30 days of receipt of said invoice.
- 7) If a grantee materially fails to comply with any term of an award, whether stated in a Federal statute or regulation, an assurance, in a State plan or application, a notice of award, or elsewhere, the Board may take one or more of the following actions, as appropriate in the circumstances:
  - a. Temporarily withhold cash payments pending correction of the deficiency by the grantee or more severe enforcement action by the awarding agency;
  - b. Disallow (that is, deny both use of funds and matching credit for) all or part of the cost of the activity or action not in compliance;
  - c. Wholly or partly suspend or terminate the current award for the grantee's program;
  - d. Withhold further awards for the program; or
  - e. Take other remedies that may be legally available.

The Board has delegated its authority to make initial determinations under this section to the Executive Director in consultation with the Board Chair and Chair of the appropriate Standing Committee. In the event that the Board determines that the grantee has materially failed to comply with any term of an award, the Board shall give (1) written notice of noncompliance, alleging the particulars of the breach, (2) possible suspension of all grant activities and (3) possible intent to terminate. The notice shall include a statement of the grantee's right to an informal conference.

Hearings. The grantee shall have the right to request, in writing, an informal conference. The informal conference shall be held not earlier than 30 days from the date of the notice unless the grantee agrees to an earlier date. Either party may request that the informal conference be either tape-recorded or recorded by a court reporter. Following the informal conference, the Board shall have the right to take any of the actions enumerated above. The decision of the Board may not be appealed.

Effects of suspension and termination. Costs of grantee resulting from obligations incurred by the grantee during a suspension or after termination of an award are not allowable unless the awarding agency expressly authorizes them in the notice of suspension or termination or subsequently. Other grantee costs during suspension or after termination which are necessary and not reasonably avoidable are allowable if the

costs result from obligations which were properly incurred by the grantee before the effective date of suspension or termination, are not in anticipation of it, and, in the case of a termination, are non-cancelable.

In the event of termination, all materials produced and equipment purchased under the performance of the grant shall become the property of the Board.

## **B. Funding Terms and Conditions**

- 1) The Board is obligated to award a grant or disburse payments under a grant only to the extent that funds are available or may become available for this purpose.
- 2) No project will be approved for funding if other sources of funds are available to carry out the purposes or activities of the project.
- 3) Grant funding may only be used for the purpose of either (1) creating a new project or (2) continuing a project funded by the Board under a grant from the previous year. Grants may not be used to fund existing activities.
- 4) All non-profit and for-profit organizations must submit financial documentation before approval of a proposal. This includes a copy of the most recent Form 990 submitted to the IRS for non-profits, and a copy of the most recent annual submission to the SEC for for-profits.
- 5) All state and local government and non-profit organizations receiving federal DD funds and expending \$500,000 or more in federal funds in a fiscal year must have an audit in compliance with OMB Circular A-133.
- 6) Federal DD grant funding may not exceed 75% of the total costs of the project. There is an exception for a project that exclusively serves a designated poverty area(s) where up to 90% of the total costs may be charged to grant funds. See Appendix C for a list of designated poverty areas.
- 7) The match ratio negotiated at the time of grant award may not be changed. The match must come from non-federal resources and those not being used to match other federal money. The match must be verifiable and available at the time that the grant award is issued.
- 8) All grantee travel-related expenditures must adhere to Virginia State Travel Regulations.
- 9) Grant expenditures must be incurred during the grant period. No expenses may be incurred before the grant period begins; funds must be encumbered by the end date of

the grant period. The **one exception** is pre-award expenditures related to attendance at a mandatory grantee orientation held prior to the grant period begin date.

- 10) Program Income is not allowed during the grant period. While this is an allowable federal expense, the Board does not allow this activity. "Program income" includes income from fees for services performed or from the sale of commodities or items produced under a grant agreement. For example, a grantee may not generate revenue by charging fees for attendees at a training event or through the sale of a training DVD.
- 11) Unallowable grant expenditures include, but are not limited to:
  - a) Indirect costs. Indirect costs are typically existing facilities and administrative costs that are necessary to operate an office and are shared by many projects. These include, but are not limited to, monthly fees for office rent, phone and internet provider fees, photocopier leases, etc. (Indirect costs may be used as a cash match to DD funds requested.)
  - b) Capital expenditures that include the acquisition of land or buildings, new construction or major repairs
  - c) Mortgage payments or related interest payments
  - d) Real estate or property taxes
  - e) Entertainment expenses
  - f) Organized fundraising, including financial campaigns, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions, regardless of the purpose for which the funds will be used
- 12) Allowable grant expenditures must be reasonable, allocable and necessary to the grant project:
  - a) The expenditure is ordinary and necessary for the operation of the grant program.
  - b) The expenditure follows sound business practice and does not deviate from the grantee's established practice.
  - c) The expenditure must conform to all laws, regulations, circulars or limitations applicable to this grant.
  - d) The expenditure must be in accordance with Generally Accepted Accounting Principles (GAAP).
  - e) The expenditure must be fully documented.
- 13) Allowable grant expenditures include, but are not limited to:
  - a) Wages for personnel working directly on the project.
  - b) Personnel fringe benefits.
  - c) Consultant services contracted to accomplish specific goals or objectives of the project.
  - d) Travel for staff, consultants or consumers involved in the project.
  - e) Materials, supplies and equipment purchased directly for use in a specific project

- f) Communication costs identifiable with a specific project, such as long-distance phone calls, faxes.
  - g) Food expenditures (not related to travel) are allowed for meetings or events only when it is used for a working lunch or breakfast, and the meeting is at least 4 hours in duration. Meeting/event agendas must be provided to receive reimbursement.
- 14) Expenditures for rental of space/facility or equipment necessary for specific grant activities as approved are allowable grant expenditures. For example, where the grantee needs to rent space for an activity conducted outside of the office, such as a training workshop or conference, rental fees for a facility and necessary equipment, such as a LCD projector, would be allowable.

Allowable expenditures for space rental **do not include monthly office rent** as it is an existing and/or indirect cost.

- 15) The following capital expenditures are allowable. All capital expenditures must be approved in advance by the Board and the U.S. Administration on Intellectual and Developmental Disabilities. Requests must be submitted in writing and must demonstrate how the expenditures are critical to the success of the project. All capital expenditure items must be fully accessible to people with disabilities.
- a) Capital Equipment: The term “equipment” includes computers and peripherals of any costs as well any piece of equipment defined as having a unit cost of at least \$5,000 with a usable life of more than one year. Requests must be accompanied with a description of how the equipment is critical to the success of the project and how the grantee organization intends to provide ancillary support (specialized wiring, access, space, operator training) for the equipment. The grantee may retain equipment purchased with DD funds unless (1) otherwise specified in writing by the Board at the time the grant is awarded, or (2) the equipment is no longer being used to support program activities initiated by the grant project.
  - b) Capital Improvements to Land or Buildings: In rare instances, the Board may allow capital improvements to land or buildings. All capital expenditures must result directly in a benefit to or service for individuals with disabilities. An example would be the purchase of adaptive equipment that improves accessibility and inclusion for a recreational program.

## C. Assurances & Certifications

### Assurances:

- 1) The grantee assures that DD Grant funds will be used to make a significant contribution towards enhancing the independence, productivity, integration and inclusion into the community of persons with developmental disabilities as defined by Public Law 106-402.
- 2) The grantee assures that DD Grant funds will be used to increase and enhance the level of funding and effort available for project purposes or activities and that these DD Grant funds will not supplant existing funds.
- 3) The grantee assures it will make maximum use of available community resources, including use of volunteers to supplement activities of paid employees, and will maintain a record of voluntary contributions to the DD Grant project.
- 4) The grantee assures that consumers with developmental disabilities and/or their families will be involved in the planning, development and implementation of the DD Grant project.
- 5) The grantee assures that when serving individuals with developmental and other disabilities through the DD Grant project, a minimum of 60% of participants must have a developmental disability.
- 6) The grantee assures that DD Grant project participants and beneficiaries will be generally representative of the community population, with particular attention to unserved or underserved groups.
- 7) The grantee assures that it will comply with the federal Civil Rights Act of 1984, as amended, and operative regulations related to employment and program participation in the implementation of the DD Grant project.
- 8) The grantee assures that it will comply with all effective Federal and State legislation and operative regulations concerning nondiscrimination of individuals with disabilities in the areas of program participation, education, employment, housing, transportation, public accommodations and telecommunications.
- 9) The grantee assures that buildings used in connection with activities supported under the DD Grant projects will meet accessibility standards.

- 10) The grantee assures that any direct services for persons with developmental disabilities provided through the DD Grant project will be made available on a non-exclusionary basis and will make reasonable provision for persons unable to pay.
- 11) The grantee assures that the human rights of all persons with developmental disabilities who receive direct services through the DD Grant project will be protected in accordance with regulations of the U.S. Department of Health and Human Services.
- 12) The grantee assures that information obtained in implementing the DD Grant project concerning personal facts and circumstances of any individual with developmental disabilities or their family will not be divulged without the individual's written consent. Any information to be compiled or disclosed will be in statistical, summary or other forms which do not identify particular individuals.
- 13) The grantee assures that any direct services provided through the DD Grant project will be provided in an individualized manner; each person with developmental disabilities who receives direct services through the DD Grant project will have in effect a written individualized plan which:
  - a) Is developed jointly with the service provider(s), the consumer of the service(s), and, if appropriate, the consumer's parent or guardian.
  - b) Includes specific goals with objectives stated in measurable terms and with corresponding evaluation procedures.
  - c) Contains a statement of specific services to be provided, identifying each agency and personnel that will deliver each service, and specifying the date of initiation and anticipated duration of such services.
  - d) Is revised at least annually.
- 14) The grantee assures that all documentation and records pertaining to the DD Grant project will be available upon request to authorized representatives of the Virginia Board for People with Disabilities or the U.S. Department of Health and Human Services.
- 15) The grantee assures that it will submit to the Virginia Board for People with Disabilities within thirty (30) days after the date of termination, or the end of the authorized project period, the required final quarterly financial report, final quarterly outcome status report, program evaluation report and project products as specified in the original DD Grant application or subsequently approved revisions.
- 16) Records must be retained for three years from the starting date of the retention period. The retention period starts on the day the grantee submits its final grant project deliverable (e.g., final financial report and outcome status report). If any litigation, claim, negotiation, audit or other action involving the records begins before

the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later. When grant support is continued or renewed at annual or other intervals, the retention period for the records of each funding period starts on the day the grantee submits to the Board its final deliverable for that period. This section applies to all grant documents including financial and programmatic records, supporting documents and statistical records.

- 17) The Board, the U.S. Department of Health and Human Services and the Comptroller General of the United States, or any of their authorized representatives, shall have the right of access to any pertinent books, documents, papers or other records of grantees which are pertinent to the grant, in order to make audits, examinations, excerpts and transcripts. The rights of access must not be limited to the required retention period but shall last as long as the records are retained.
- 18) The grantee assures that no officer or employee has a personal FINANCIAL INTEREST in the DD Grant contract, in accordance with the provisions of the State and Local Government Conflict of Interest Act 2.2-3100, et seq., of the Code of Virginia.

## **Certifications**

- 1) The grantee certifies that it, its authorized official and its fiscal agent are not presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from covered transaction by any federal department or agency in accordance with 45 C.F.R., Subparts 73 and 92, Debarment or Suspension of Former Employees.
- 2) The grantee certifies that it will provide a drug-free workplace in accordance with the Drug-Free Workplace Act.
- 3) The grantee certifies that federal grant funds provided under this award will not be used by the grantee to support lobbying activities to influence proposed or pending Federal or State legislation or appropriations, in accordance with 45 C.F.R., Part 93, New Restrictions on Lobbying. This prohibition is not intended to affect an individual's right or that of any organization, to petition Congress, or any other level of Government, through the use of other resources.

## IV. Grants Management

### A. Administrative Requirements

**Signature Authority:** Only the Project Coordinator and Authorized Official of the grantee organization are authorized to sign grant documents. Both the Project Coordinator and Authorized Official must sign all required documents, including Financial Reports. These must be the same individuals identified on the approved grant application.

**Changes to Project Personnel:** If the Project Coordinator or Fiscal Coordinator should change during the grant period, the Authorized Official must provide written notification and justification to the VBPD Program Manager. The notification should include all of the new contact information for the new Program or Fiscal Coordinator, including name, title, address (if different), phone number and e-mail.

If the Authorized Official should change, another official of the grantee organization must provide written notification and justification to the VBPD Program Manager. The notification should include all of the new contact information for the Authorized Official including name, title, address (if different), phone number, e-mail.

**Changes to Job Description of Project Personnel:** Any changes in responsibilities of project personnel must be reported in writing to the VBPD Program Manager.

**Consumer Satisfaction Surveys:** The Board is required to submit a Program Performance Report annually to its oversight agency, the Administration on Intellectual and Developmental Disabilities (AIDD). The report includes a report on Consumer Satisfaction and Constituent Feedback information regarding activities that it funds, using standardized measures provided by AIDD that cannot be significantly altered by the Board. As a result, grantees are asked to complete a "Grantee Satisfaction and Feedback Survey" annually throughout the grant period. See Appendix D for the "Grantee Satisfaction and Feedback Survey" form.

Grantees will also be required to assist the Board in collecting similar information from the individuals who participate in activities or receive services through their Board-funded projects. Board staff will work with grantees to determine the most appropriate timing and means for collecting information from these individuals. **Please ensure that all grant participants are aware that they are participating in a Board funded activity.**

### B. Program Requirements

**Programmatic Reporting:** Each Grantee is required to submit to the Board a quarterly Program Report detailing the project status in relationship to expected - program activities, outcomes and performance measures. However, in addition to the submission of quarterly program

reports, grantees should notify the Board Program Manager immediately of any problems or barriers related to the project.

The VBPD Program Manager will develop a Program Report template for each grant project and will provide to the grantee following the awarding of the DD grant. Required activities, outcomes and performance measures will be developed directly from the approved proposal. Outcome measures for each grant will be used to meet the Board's federal and state reporting requirements.

The program report should be submitted electronically and is due to the VBPD Program Manager 15 days following the end of each calendar quarter. In submitting the quarterly report, the grantee must follow the format and complete the electronic form provided by the Board.

**Performance Measure Data:** The Board is required to submit a Program Performance Report (PPR) annually to its federal oversight agency, the Administration on Intellectual and Developmental Disabilities. The report includes a summary of all projects and activities conducted during the year, including projects implemented by Board grantees. These Performance Measures are used to determine the DD Council's success in meeting its goals and objectives, and are used by the federal oversight agency in performance reports to the Administration and Congress. See Appendix B for more information on Federal Areas of Emphasis and Performance Measures.

Performance Measures and targets for each grant project are assigned prior to the beginning of the grant period. Grantees are required to collect and report on Performance Measures in quarterly program reports. Data reported must be unduplicated counts during the federal fiscal year.

**Stories about People with Disabilities:** In the quarterly program reports and final report, or at other times as requested, and protecting the privacy of program participants, grantees will provide stories about people with developmental and other disabilities **whose lives have improved** as a result of grant activities. Examples of the types of stories to be shared (who, what, when, where and why) include: how someone became more independent because they obtained employment or transportation; how someone became more connected to their community as a result of opportunities provided through the grant; or how someone was able to remain in the community vs. being institutionalized.

**Post-Project Performance Measurements:** Grantees may be required to collect and report data on project outcomes after the grant has ended in order to assist the Board in meeting its federal reporting requirements and to evaluate long-term systemic changes related to the grant.

**Programmatic Attachments:** In addition to the required program report, all additional materials developed under the grant and information pertinent to the public record of the

project must be submitted to the Board, including newspaper articles, brochures, bulletins, status reports and evaluation results.

When conducting grant activities, grantees must announce that **reasonable accommodations** for individuals with disabilities are available upon request. Following is sample language to include in event announcements:

Reasonable accommodations, such as interpreter services and alternate format materials, for persons with disabilities should be requested by [date]. Requests should be made to [contact info].

## C. Fiscal Management

***Financial Reporting:*** Grant funds are disbursed quarterly on a cost reimbursement basis. Each Grantee is required to submit to the Board a quarterly Financial Report in order to be reimbursed for grant expenditures and to report poverty area spending and matching.

The Financial Report is due to the VBPD Program Manager 15 days following the calendar quarter for which the grantee is requesting reimbursement. The grantee must submit an original hard-copy report that is signed by the Project Coordinator and the Authorized Official. Reimbursement payments to state agencies additionally require an Inter-Agency Transfer (IAT) Invoice to make a transfer of accounts.

The Department of Rehabilitative Services (DRS) is the fiscal agent for the Board. If a grantee is not a DRS vendor, they must complete a W-9 form at the beginning of the grant period.

Following the receipt, review and approval of the required quarterly program report and the financial report, transmittal of grant funds to the grantee is authorized. If reporting information is incomplete or progress appears to be unsatisfactory, transmittal of grant funds will be placed on hold until the issue of concern is resolved.

***Financial Records:*** Grantees are required to maintain complete financial records for all project expenditures. These include total grant expenditures, grant expenditures in designated poverty areas and matching expenditures. Financial records include, but are not limited to, records of purchases, receipts for cash payments, documentation for in-kind contributions, personnel timesheets and payroll vouchers. All financial records must be readily available for examination by authorized personnel from the Board or any other authorized officials.

***Match Guidelines:*** Grantees are required to contribute 25% of Total Project Costs to the project. If a project exclusively serves a Designated Poverty Area (see Appendix C), the grantee is required to contribute 10% of the Total Project Costs. Match expenditures are monitored along with DD fund expenditures.

Acceptable match includes: local, public and private cash contributions; state cash contributions; and in-kind contributions such as space, rent, volunteer time (*including fair market value and fringe benefits*), materials/paper products or travel expenses. In-kind contributions must be specified, verifiable and based on fair market value. Please note that the personnel contributions of existing staff should be listed as cash match as opposed to in-kind match.

**Designated Poverty Area Reporting:** If a grant project serves a poverty area(s), in whole or in part, the grantee is required to report the poverty area grant expenditures in the Financial Report. Poverty area costs must be associated with activities that are exclusively focused on a poverty area. These could include training of persons living in a poverty area, training of professionals whose work serves a poverty area, incentive programs that require professionals to work in a poverty area (such as a condition on scholarship funding) or providing demonstration services to persons with developmental disabilities living in a poverty area. The basic requirement is that the focus be on the poverty area and that the benefits do not accrue to persons in a poverty area by virtue of being part of a larger area that is the beneficiary of an activity. It is the responsibility of the grantee to track the grant expenditure activities for each poverty area and report quarterly on the Financial Report Form.

**Audits:** For state and local government and non-profit organizations receiving federal DD funds and expending \$500,000 or more in federal funds in a fiscal year, an audit is required in accordance with OMB Circular A-133 pursuant to the Single Audit Act of 1984, P.L. 98-502, and the Single Audit Act Amendments of 1996, P.L. 104-156. A copy of the audit or, if posted to a website, the website link must be provided to the Board as soon as it becomes available.

## **D. Revisions to Schedule, Scope of Work and Budget**

Grantees are expected to complete their projects in accordance with the RFP and approved proposal. Any requests for changes should be rare and must include a justification for the revision that explains why the revision is necessary to accomplish the outcomes of the grant. A request must be made in writing by the grantee and submitted to the VBPD Program Manager for approval. In some instances, detailed below, requests for revisions must be reviewed and approved by the Board. Board meetings occur in September, December, March and June. Consult with your VBPD Program Manager to ensure that request is submitted in **advance** of the Board meeting.

**Schedule Revisions.** Grantees are expected to conduct activities in accordance with the timelines in the approved proposal and to complete the project by the end of the grant period. Any changes to the activity timelines must be reviewed by the VBPD Program Manager. At the discretion of the VBPD Program Manager and Grants Manager, a grantee may be requested to submit a revised Quarterly Activity Timeline & Budget Projection and/or a revised Work Plan for review and approval.

**Revisions to the schedule are not allowed in the final quarter of the grant period.**

**Scope of Work Revisions.** Grantees are expected to complete their projects in accordance with the approved proposal. A revision to a project's scope of work is necessary when the grantee requests a change in the project's activities, performance measures, deliverables or products. To request a revision to the project's scope of work, the grantee Project Coordinator and Authorized Official must submit the following items to the VBPD Program Manager and Director:

- a letter which details the specific changes to be made;
- a Revised Work Plan; and
- a Revised Quarterly Activity Timeline and Budget Projection.

Any request to revise the project scope of work must be approved by the appropriate Standing Committee and full Board.

**Revisions to the scope of work are not allowed in the final quarter of the grant period.**

**Budget Revisions.** Any proposed revisions to the budget, including new line items and shifting of funds between expenditure categories, require written request to the Board for review and approval in advance of the grant expenditure. Expenditures made without such prior approval will not be reimbursed.

**New Budget Line Items:**

Any requests for new budget line items, not included in the approved proposal, must be submitted by the grantee to the VBPD Program Manager for review and approval. The grantee must complete a Budget Amendment Request Form that provides a justification for the new item(s) and, if applicable, the elimination of any items. The Program Manager and Grants Manager will review the budget amendment for approval.

**New budget line items may not be requested in the final quarter of the grant period.**

If the budget revision includes a shift of grant funds between expenditure categories, the following procedures will apply.

#### Shifting Less than 10% in Grant Funds between Expenditure Categories:

A request for a budget revision that is shifting **less than 10%** of the grant award between expenditure categories must be submitted by the grantee to the VBPD Program Manager for review. The grantee must complete a Budget Amendment Request Form that provides a justification for the changes. The Program Manager and Grants Manager will review the budget amendment for approval.

#### Shifting 10% or More in Grant Funds between Expenditure Categories:

A request for a budget revision that is shifting **10% or more** of the grant award between expenditure categories must be submitted by the grantee to the VBPD Program Manager for review. The grantee must complete a Budget Amendment Request Form that provides a justification for the changes. The Program Manager and Grants Manager will review the budget amendment and make a recommendation to the appropriate Standing Committee and full Board. Requests will be reviewed at the quarterly Board meetings.

### **E. Project Monitoring**

Each grant is monitored by the Board Program Manager. The Program Manager works directly with the grant Project Coordinator and closely monitors the grant through:

- review of quarterly program and financial reports submitted by the grantees;
- periodic meetings, phone calls or e-mails to review project status and provide guidance;
- attendance and/or participation at events sponsored by the grantee;
- attendance at advisory committee meetings; and
- site visits to the grantee.

The Program Manager provides the Standing Committee with quarterly program reports at Board meetings and may provide additional information throughout the grant period, as necessary. The Grants Manager also provides a quarterly report on grant expenditures to the Board. During or following the grant period, the grantee may be asked to make a presentation to the Standing Committee or the full Board.

The grant Project Coordinator should not wait until quarterly reports to consult with his/her VBPD Program Manager regarding problems or questions about the grant project.

### **F. Project Deliverables and Products**

All printed, audio/visual and online products must contain an Acknowledgment Statement formally recognizing the Board's financial support. The Acknowledgment Statement must

include the Board's logo and be prominently presented on all products developed under the grant.

Sample Acknowledgement Statement

##% (state the percentage) of the funding for this product was provided by the Virginia Board for People with Disabilities under the federal Developmental Disabilities and Bill of Rights Act. For more information on the Board, please contact: Virginia Board for People with Disabilities, 1100 Bank Street, 7<sup>th</sup> Floor, Richmond, VA 23219, (800) 846-4464, or visit the Board's website at [www.vaboard.org](http://www.vaboard.org).

All deliverables and products developed using Board funds must be developed so that alternative formats can be produced (examples: Braille, large print, CD, captioned videos, descriptive video, audio recording, audio transcript). Alternative formats must be made available upon request.

Please ensure that all deliverables and products are dated. Whether on the title page, in the footer of a document, on the homepage or in the footer of a webpage, or on a label of a CD, there should be some reference as to when the product was created.

At least 2 weeks prior to the planned completion of a grant deliverable or product, unless otherwise specified, the grantee must submit a draft or other fully representative mock-up of the grant deliverable or product to the VBPD Program Manager for written review and approval prior to public distribution or release. Upon approval and completion of the deliverable or product, the grantee must provide the VBPD Program Manager with a physical and electronic final version, as applicable, and an industry-standard, reproduction-quality master copy, where applicable.

Unless otherwise specified in the terms of the DD grant, when copyrightable material is developed in the course of the project, the grantee is free to copyright the material or permit others to do so. However, the Board and the U.S. Department of Health and Human Services shall retain royalty-free, non-exclusive and irrevocable rights to reproduce, publish or otherwise use, and to authorize others to use the material developed under the grant. This applies to tangible and intangible property.

In the event of early termination of the grant project, all project products and deliverables both completed and under development and any undistributed physical inventories of such become the immediate property of the Board and must be delivered to the Board in a timely manner at the grantee's expense.

## G. Project Closeout

To fulfill the terms of the DD Grant contract, all project closeout reports and products must be submitted to the Board Program Manager in hard copy and electronic format within thirty (30) days after the end of the grant period. The final Financial Report will be processed when the Program Manager has approved all final documents. When these requirements are completed, grantees will receive written notification of formal closeout of the grant.

Project closeout must include:

1. **Project Products and Deliverables** -- Digital /print master of any products or deliverables, if applicable.
2. **Final Quarterly Financial Report** -- Should be marked "Final."
3. **Final Quarterly Program Report**
4. **Final Project Report** – Outcome oriented and addressing the goals, objectives and activities outlined in the approved proposal and workplan. The report should contain the following sections:
  - a. **Primary Goal of the Grant** -- An assessment of the success of the grant in achieving its purpose. State the primary goal(s) of the grant and its expected impact.
  - b. **Program Performance** -- An assessment of the achievement of each objective as outlined in the Work Plan utilizing the following format:

**Accomplishments:** State the overall completion rate and list each required activity that demonstrates accomplishment of the objective. If any activities were not completed, please explain.

**Performance Measures:** State all Performance Measures and numbers that were achieved for the grant period. Include the original target numbers and actual numbers.

**Demographics:** Identify and describe who was served or involved in achieving the objective.

**Consumer Participation:** Describe consumer input received on this objective. What did consumers say?

**Barriers:** Identify the barriers that were encountered with achieving the objective and how they were addressed.

**Effective Strategies:** Explain what you recommend as particularly effective in your achievements and in overcoming the barriers encountered.

- c. **Stories of People with Disabilities** -- Provide detailed narrative stories about people with developmental and other disabilities whose lives improved as a result of grant activities. Where consent of the participant is obtained, include photographs, video clips, or details (who/what/when/why/where) and a signed media release so that the Board can publicize the effects of the grant and how lives were impacted during and after grant activities.
- d. **Assessment of Systemic Impact of Grant** -- Describe the overall systems level impact this grant has had on benefiting people with developmental disabilities in Virginia and their families.
- e. **Sustainability Plan** -- Describe how the program will continue and what resources have been secured for the program following the end of grant funding.
- f. **Future Actions** -- What assistance is needed so that the results of the project can be shared in order to have the greatest impact possible? What agency or entity should be involved in this dissemination? As a result of the grant, are there recommendations for future action by the Board or other agencies to better meet the needs of persons with developmental disabilities in Virginia? Is there a need for policy reform, advocacy or other actions necessary to improve access to and delivery of services for unserved/underserved and minority populations?

## **APPENDICES**

- A. Governing Documents for DD Grants
- B. Federal Performance Measures
- C. Designated Poverty Areas
- D. Consumer Satisfaction Survey Form

The documents that govern VBPD Developmental Disabilities' Grants include, but are not limited to:

Applicable to:	Document	Where to Find?
All Grantees	U.S. Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act)	<a href="http://www.acf.hhs.gov/programs/add/ddact/DDACT2.html">http://www.acf.hhs.gov/programs/add/ddact/DDACT2.html</a>
All Grantees	Virginians with Disabilities Act, Section 51.5-33	<a href="http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+51.5-33">http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+51.5-33</a>
All Grantees	Olmstead Initiative	<a href="http://www.olmsteadva.com/">http://www.olmsteadva.com/</a>
All Grantees	2012-16 Virginia State Plan and subsequent annual updates	<a href="http://www.vaboard.org/reports.htm">http://www.vaboard.org/reports.htm</a>
Higher Ed, Hospitals, Non-Profits, Commercial	Title 45 – Public Welfare 45 Code of Federal Regulation (CFR) Part 74, Uniform Administrative Requirements for Awards and Subawards	<a href="http://www.access.gpo.gov/nara/cfr/waisidx_04/45cfr74_04.html">http://www.access.gpo.gov/nara/cfr/waisidx_04/45cfr74_04.html</a>
For-Profits (Commercial)	Title 48 - Federal Acquisition Regulations System 48 CFR Part 31 Contract Cost Principles and Procedures	<a href="http://www.access.gpo.gov/nara/cfr/waisidx_02/48cfr31_02.html">http://www.access.gpo.gov/nara/cfr/waisidx_02/48cfr31_02.html</a>
State, Local, Tribal Governments	45 CFR Part 92, Uniform Administrative Requirements for Awards and Subawards	<a href="http://www.access.gpo.gov/nara/cfr/waisidx_04/45cfr92_04.html">http://www.access.gpo.gov/nara/cfr/waisidx_04/45cfr92_04.html</a>
State, Local, Tribal Governments	Office of Management and Budget OMB Circular A-87 Office of Management and Budget Cost Principles	<a href="http://www.whitehouse.gov/omb/circulars">www.whitehouse.gov/omb/circulars</a>
Higher Ed	OMB Circular A-21 Office of Management and Budget Cost Principles	<a href="http://www.whitehouse.gov/omb/circulars">www.whitehouse.gov/omb/circulars</a>
Higher Ed, Hospitals and Non-Profits	OMB Circular A-110 Uniform Administrative Requirements	<a href="http://www.whitehouse.gov/omb/circulars">www.whitehouse.gov/omb/circulars</a>
Non-Profits	OMB Circular A-122 Office of Management and Budget Cost Principles	<a href="http://www.whitehouse.gov/omb/circulars">www.whitehouse.gov/omb/circulars</a>
All Grantees	OMB Circular A-133 Office of Management and Budget Cost Principles	<a href="http://www.whitehouse.gov/omb/circulars">www.whitehouse.gov/omb/circulars</a>
All Grantees	Virginia State Travel Regulations (Dept. of Accounts, CAPP Manual)	<a href="http://www.doa.virginia.gov/Admin_Services/CAPP/CAPP_Topics/20335.pdf">http://www.doa.virginia.gov/Admin_Services/CAPP/CAPP_Topics/20335.pdf</a>
All Grantees	Grants Manual	<a href="http://www.vaboard.org/competitive.htm#DDGrantManual">http://www.vaboard.org/competitive.htm#DDGrantManual</a>
All Grantees	VBPD Request for Proposals	
All Grantees	Approved Proposal	
All Grantees	Developmental Disabilities Grant Agreement	

## **Federal Performance Measures**

Below is an explanation of the current Federal Performance Measures, followed by a complete list of the measures. These measures were revised in January of 2013. Please pay special attention to those Performance Measures that are required under your project's Scope of Project; however, you may have grant activities that will garner additional outcomes. Projects are expected to improve and expand the disability service system and to directly impact individuals with developmental and other disabilities.

### **Introduction**

The Board submits a Program Performance Report (PPR) annually to its federal oversight agency, the U.S. Administration on Intellectual and Developmental Disabilities. The report includes a summary of all projects, including those implemented by Board grantees, and activities conducted during the federal fiscal year. In addition, for each federal performance measure, the Developmental Disability (DD) Council reports the cumulative total from all projects and activities. These measures are used to determine the DD Council's success in meeting its goals and objectives, and are used by the federal oversight agency in performance reports to the administration and the congress.

**Types of Measures:** The 3 basic categories of measures are **Self-Advocacy and Advocacy; Systems Change;** and **Resources (dollars) Leveraged.**

### **List of Federal Performance Measures**

#### **Performance Measures (self-advocacy & advocacy)**

- SA01 People trained in area related to goal/objective
- SA02 People trained in leadership, self-advocacy and self-determination
- SA03 People trained in systems advocacy
- SA04 People active in systems advocacy
- SA05 People attained membership on public/private bodies and leadership coalitions

#### **Performance Measures (systems change)**

- SC01 Programs/policies created or improved
- SC02 Organizations involved in coalitions/networks/partnerships
- SC03 Organizations engaged in systems change efforts
- SC04 Public policymakers educated
- SC05 Members of the general public reached

#### **Performance Measures 3 (resource leveraging)**

- RL01 Dollars Leveraged

## **Additional Performance Measures (VBPD)**

The following Performance Measures are ones that the Board will also collect, in addition to the Federal Performance Measures. These measures indicate a significant positive outcome for adults and children with developmental and other disabilities.

### **Community Supports:**

CS01 People with disabilities receive formal/informal community supports.

### **Early Intervention (EI):**

EI01 Infants and young children with disabilities have the services/supports needed to reach developmental goals.

### **Education (ED):**

ED01 Students with disabilities have the education and support they need to reach their educational goals.

ED02 Students with disabilities transition from school to community and jobs.

### **Employment:**

EM01 Adults with disabilities have jobs of their choice.

### **Healthcare:**

HE01 People with disabilities have needed health services.

### **Recreation:**

RE01 People with disabilities are active in recreational activities.

### **Housing:**

HO01 People with disabilities have homes of their choice.

HO02 People with disabilities move from congregate settings to homes in the community.

### **Transportation:**

TR01 People with disabilities have needed transportation services.

## DESIGNATED POVERTY AREAS in VIRGINIA

The following table lists the counties and cities that have been identified as poverty areas based on the percentage of individuals (all ages) in a locality who are at or below the Federal Poverty Level of income in 2012. The Board prioritized those localities which have a **poverty rate of 15.0 percent or greater**, which was the national poverty rate that year (the most current poverty estimates available). In 2012, Virginia's overall poverty rate was 11.6 percent.<sup>1</sup>

Our reason for adopting the national poverty rate is to focus attention on those localities which have the greatest poverty. As noted by the Weldon Cooper Center for Public Service at the University of Virginia(2011), although the Commonwealth as a whole has a relatively high median per capita household income and relatively low poverty rate, the aggregate data obscures the significant variation in income and poverty at the local and regional levels. The aggregate data is impacted by trends in Northern Virginia, which contains nearly a third of the state's total population.<sup>2</sup>

For grant projects **exclusively serving a designated poverty area(s)**, the Board will fund up to 90% of the Total Project Costs. The minimum match requirement then is 10% of the Total Project Costs. To determine Total Project Costs, divide the total grant funds requested by 90%.

For all other DD grant projects the minimum match requirement is 25% of the total project costs.

### Data Sources:

1. U.S. Census Bureau: <http://www.census.gov/did/www/saipe/data/index.html>
2. Rebecca Tippett (Ed.) (2011). *Virginia's Regions: Demographics & Workforce*. Weldon Cooper Center for Public Service (University of Virginia), Retrieved online from: <http://www.coopercenter.org/demographics/publications/Virginias-regions>

**DESIGNATED POVERTY AREAS [Poverty rates of 15.0% or more]:**

<b>COUNTIES</b>	<b>CITIES</b>
Accomack	Bedford
Brunswick	Bristol
Buchanan	Buena Vista
Buckingham	Charlottesville
Campbell	Covington
Carroll	Danville
Charlotte	Emporia
Cumberland	Franklin
Dickenson	Fredericksburg
Grayson	Galax
Greensville	Hampton
Halifax	Harrisonburg
Henry	Hopewell
Lancaster	Lexington
Lee	Lynchburg
Lunenburg	Martinsville
Mecklenburg	Newport News
Montgomery	Norfolk
Northampton	Norton
Nottoway	Petersburg
Page	Portsmouth
Patrick	Radford
Prince Edward	Richmond
Pulaski	Roanoke
Richmond County	Staunton
Russell	Waynesboro
Scott	Williamsburg
Smyth	Winchester
Southampton	
Sussex	
Tazewell	
Westmoreland	
Wise	



## Virginia Board for People with Disabilities

### Grantee Satisfaction and Feedback Survey

Regular feedback from its many diverse constituents has consistently helped the **Virginia Board for People with Disabilities** improve its advocacy, outreach, training, funding, and other activities. Tabulated results of the following **Grantee Satisfaction and Feedback Survey** will be used by the Board in planning and improving its future grant projects and their administration. Individual responses are anonymous and confidential. The Board respects your privacy and wants to encourage you to answer all questions as accurately and completely as possible.

Questions in the first two sections of this survey conform to a national template provided by the federal Administration on Intellectual and Developmental Disabilities (ADD) which supplies the funding for Board grants. ADD requires these questions to be used by all states for all ADD funded activities, and the Board may not modify them other than to indicate to which Board-sponsored activity they apply. Results must be reported to ADD to ensure its future funding of Board grants and other activities.

**Your completion of this survey will be greatly appreciated!** Your feedback will play an important role in ensuring the quality and support of the Board's mission on behalf of Virginians with disabilities.

If you are unable to complete and return the survey on-line, require assistance in completing it, require it in another format, or have any questions about the survey or any of the Board's activities, please let us know. Additional information, assistance, and copies of the survey in printed or other accessible formats may be obtained by calling the Board at 1-800-846-4464 (voice & TTY), faxing us at 804-786-1118, or sending us an e-mail at [info@vbpd.virginia.gov](mailto:info@vbpd.virginia.gov).

#### Consumer Satisfaction

1. Please check either **Yes** or **No** to tell us your opinion about the following statements.
  - a) Participants in this Board-funded project have been treated with respect during their participation.
 

<input type="checkbox"/> Yes	<input type="checkbox"/> No
------------------------------	-----------------------------
  - b) Participants in this Board-funded project have more choice and control as a result of their participation.
 

<input type="checkbox"/> Yes	<input type="checkbox"/> No
------------------------------	-----------------------------

## Grantee Satisfaction and Feedback Survey

- c) Participants in this Board-funded project can do more things in their community as a result of their participation.

Yes

No

2. Please check the answer that best describes your opinion about the following statements.

- a) Overall, participants in this Board-funded project are satisfied with this project.

Strongly Agree

Agree

Disagree

Strongly Disagree

- b) Overall, the lives of participants in this Board-funded project are better because of their participation.

Strongly Agree

Agree

Disagree

Strongly Disagree

3. Please check either Yes or No in response to the following statement.

- a) Rights and protection issues were included in this Board-funded project.

Yes

No

If you answered Yes to Question #3a above, please check either Yes or No in response to the following related statements. If you answered No, please skip the next two statements.

- b) Because of their participation in this Board-funded project, its participants know their rights.

Yes

No

- c) Because of their participation in this Board-funded project, its participants are more able to be safe and protect themselves from harm.

Yes

No

4. Briefly, please tell us what has been helpful or not helpful about this Board-funded project for its participants.

# Grantee Satisfaction and Feedback Survey

## Stakeholder Feedback

5. Please check the answer that best describes your opinion about the following statements.

a) Board activities have improved the ability of individuals with developmental disabilities and family members to make choices and exert control over the services and supports they use.

<input type="checkbox"/>					
Strongly Agree	Agree	Agree Somewhat	Disagree Somewhat	Disagree	Strongly Disagree

b) Board activities have improved the ability of individuals with developmental disabilities and family members to participate in community life.

<input type="checkbox"/>					
Strongly Agree	Agree	Agree Somewhat	Disagree Somewhat	Disagree	Strongly Disagree

6. Briefly, please share any other comments you may have about the **impact** of Board activities on the lives of individuals with disabilities and their families.

7. Please check the answer that best describes your opinion about the following statement.

a) Board activities promote self-determination and community participation for individuals with developmental disabilities.

<input type="checkbox"/>					
Strongly Agree	Agree	Agree Somewhat	Disagree Somewhat	Disagree	Strongly Disagree

## Grantee Satisfaction and Feedback Survey

8. Briefly, please share any other comments you may have about your level of **satisfaction** with Board activities.

### Grant Administration

9. Please check the answer that best describes your opinion about the following statement.

- a) The quarterly reporting process was easy to understand.

<input type="checkbox"/>					
Strongly	Agree	Agree	Disagree	Disagree	Strongly
Agree		Somewhat	Somewhat		Disagree

- b) The Site Visits were helpful and productive.

<input type="checkbox"/>					
Strongly	Agree	Agree	Disagree	Disagree	Strongly
Agree		Somewhat	Somewhat		Disagree

- c) Board staff were responsive to my needs throughout the grant.

<input type="checkbox"/>					
Strongly	Agree	Agree	Disagree	Disagree	Strongly
Agree		Somewhat	Somewhat		Disagree

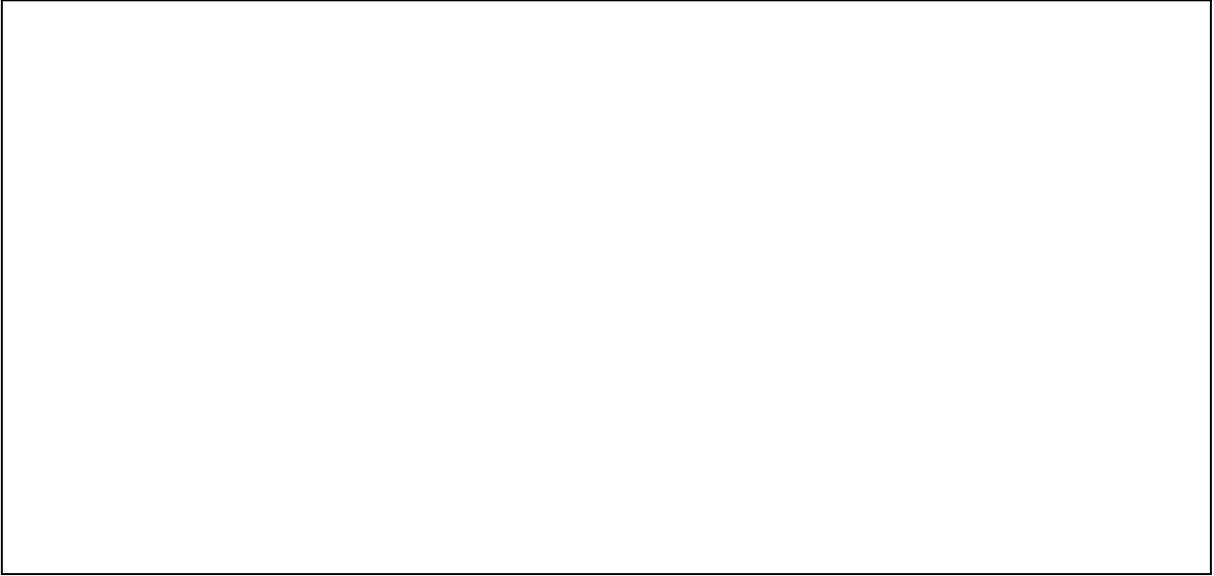
- d) The Adopt-A-Grant Board member involvement in the monitoring process enhanced the project.

<input type="checkbox"/>					
Strongly	Agree	Agree	Disagree	Disagree	Strongly
Agree		Somewhat	Somewhat		Disagree

Does not apply; an Adopt-A-Grant Board member was not involved.

## Grantee Satisfaction and Feedback Survey

10. Please share any comments you may have about the specific **grant administration** processes listed above or about the Board's grant administration processes in general.

A large, empty rectangular box with a thin black border, intended for the respondent to provide their comments on grant administration processes.