



STATE OF INDIANA



Eric J. Holcomb, Governor
Devon McDonald, Executive Director

Indiana Criminal Justice Institute Supporting Documentation Policy for State and Federal Grants

I. Purpose

The Indiana Criminal Justice Institute (“ICJI”) is responsible for ensuring that the organizations it provides State and Federal funds to (hereinafter referred to as subgrantees) are utilizing those funds in compliance with the relevant State and Federal laws, rules, and regulations. Part of that responsibility includes ensuring that appropriate supporting documentation is included with all requests for reimbursement that are submitted to ICJI. This policy aims to establish a consistent set of guidelines for what documentation is required for each type of item included in a subgrantee’s approved grant budget.

II. Scope

This policy applies to all organizations that receive grant funds from ICJI, including but not limited to State agencies, local government entities, nonprofit organizations, institutions of higher education, and for-profit organizations.

III. General Documentation Guidance

All subgrantees should be knowledgeable of 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. It is available at www.eCFR.gov.

All subgrantees should also be knowledgeable of the Department of Justice “Grants Financial Guide”, which can be found at <https://ojp.gov/financialguide/DOJ/index.htm>. To download a copy, click on “PDF Version” under Now Available!

Every expense that a subgrantee has requested reimbursement for must be supported by adequate documentation showing that the expense:

1. occurred within the grant period,
2. is allowable,
3. is reasonable, and
4. is supported by verification of payment.

Adequate supporting documentation must be attached with each monthly/quarterly fiscal report that is submitted to ICJI requesting reimbursement. All documentation must be legible and properly marked to indicate which specific items reimbursement is being requested for. For organizations with tax-exempt status, documentation of such should be provided when making grant-related expenditures.

The type of supporting documentation that is required to accompany a request for reimbursement depends on what items were approved in the grant application and budget. More detail on this topic is provided below in

Section VI. In addition, sample documentation that is acceptable for certain budget items is discussed below and attached to this document. Samples are intended to be used as a reference and do not represent the only acceptable documentation for a line item.

IV. Pro-Rating Expenses

Each receipt, invoice, utility bill, paystub, timesheet, etc. must be for periods within the dates of the grant award period. A paystub/timesheet/bill/etc. may start before or end after the grant period, but a subgrantee can only be reimbursed for costs incurred within the grant period of performance. As a result, documentation that covers time outside of the grant period of performance must be pro-rated to only seek reimbursement for the days that fall inside the grant period of performance.

For example, if a grant ends on September 30th and your organization's pay period runs from September 23rd to October 6th, you would pro-rate the salary/benefits for that grant to only include the days from September 23rd to September 30th. If your organization received an additional grant beginning October 1st, the remaining days of October 1st through October 6th would be pro-rated and included on your new grant. You would submit the same paystub and timesheet with the reimbursement requests for both grants with the notation that they were pro-rated due to the end/beginning of the grant period.

Another form of pro-rating involves only seeking reimbursement for the portion of expenses that is directly attributable to each funding stream. Subgrantees can only request reimbursement for the percentage of each expense that is related to the grant program that is being funded. As a result, it may be necessary to pro-rate rent/utility/other costs between grants if your organization receives multiple grants from ICJI. Questions on pro-rating between multiple grants should be directed to your Grant Manager.

V. Proof of Payment

Proof of payment must accompany all requests for reimbursement, regardless of budget category. There are three basic methods of showing proof of payment:

1. Canceled check
 - a. Must show proof from a financial institution that the check was cashed or deposited
2. Bank statement
 - a. Must show that the funds left the account and include reference to a check number if payment was made by check
3. Ledger
 - a. Must include the account number and source of funds; the date each expense was paid; a description of each expense; the amount paid; and either a check number, ACH/EFT identification number, or other source document reference number
 - b. A sample ledger that is sufficient to illustrate proof of payment is attached to this policy.

ICJI will not accept spreadsheets, computer-generated reports, copies of the front side of a check, or purchase requests as proof of an expenditure. These documents may accompany a request for reimbursement, but they should be sent in addition to the documentation requirements set out above, not in lieu of them. If your organization utilizes bank statements as proof of payment, please ensure a check number is printed on the invoices/receipts to make tracking easier.

VI. Required Documentation by Budget Category

This section includes the *minimum* required documentation for each budget category. Because this list does not encompass every possible item that could be included in an approved budget, items not covered by this policy should be discussed with your Grant Manager to determine appropriate supporting documentation.

A. Personnel

a. Paystubs or Payroll Reports

- i. Paystubs or payroll reports must show the employee name, hours worked, hourly rate of pay, gross wages earned, pay period start and end dates, pay date, and all deductions for taxes/benefits/etc.
- ii. For organizations utilizing payroll reports, the reports cannot be generated by your organization and should be provided by the third-party payroll company that handles your payroll.
- iii. If your organization does not utilize a system that creates paystubs, please contact your Grant Manager to discuss what your organization utilizes and ICJI will determine if your system meets the documentation requirements.

b. Timesheets

- i. Employee timesheets are required for each employee (whether salaried or non-salaried) and must show daily work activity (i.e. 8 hours or 9-5).
- ii. If an employee's time is being charged to multiple grants, allocated timesheets must accurately reflect the amount of time worked daily on each grant.
- iii. If an employee is funded by multiple grants, allocated timesheets should be based on actual time worked on each grant, not simply divided based on the percentage the employee is funded on each grant.
- iv. Employee timesheets must be signed and dated by the employee and an approving official or other authorized individual who has knowledge of the work performed.
- v. Timesheets with typed/digital "signatures" are acceptable in situations where 1) an organization utilizes an approved electronic time reporting system, or 2) each digitally signed timesheet is accompanied by a copy of the email where the employee sent the timesheet to their supervisor for approval.

c. Electronic Timekeeping Systems

- i. Electronic time and attendance systems are authorized and can be used, but the system must require the employee and approving official to prove who they are to be allowed to enter or approve time. An example of this is a system that requires a user ID and password to log in.
- ii. Subgrantees must provide information regarding their electronic timekeeping system to their Grant Manager at the beginning of each new grant cycle and update the Grant Manager if they intend to utilize a new system.
- iii. The same requirements apply as for regular timesheets in that an electronic timesheet is required for each employee (whether salaried or non-salaried) and must show daily work activity (i.e. 8 hours or 9-5).
- iv. If an employee's time is being charged to multiple grants, allocated electronic timesheets must accurately reflect the amount of time worked daily on each grant. If an electronic time system is unable to produce allocated timesheets, allocated paper timesheets must be submitted as well.

B. Employee Benefits

a. Paystubs or Payroll Reports

- i. Paystubs or payroll reports for each employee should list all employer-paid benefits.

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- ii. If your organization does not utilize a system that creates paystubs, please contact your Grant Manager to discuss what your organization utilizes and ICJI will determine if your system meets the documentation requirements.
 - b. Invoices from Outside Organizations
 - i. If your paystubs do not show employer paid benefits, you must provide copies of the monthly/quarterly/yearly (whichever you receive) invoices from the outside organization(s) your organization utilizes for your employees to receive benefits (i.e. Blue Cross, Delta Dental, Aetna, Cigna, etc.).
 - c. Self-Insurance
 - i. Invoices for the costs paid *into* the pool or fund must be provided.
 - ii. If your organization does not have a breakdown of the cost of self-insurance for each individual employee, you should utilize the total cost to your organization divided by the number of employees in determining an appropriate amount to budget for each employee on the grant.
 - d. Unemployment Insurance
 - i. If your paystubs do not show unemployment insurance payments, you must provide documentation for the payments made to the state and/or federal government for these costs.

C. Supplies and Operating Expenses

- a. Supplies have an individual unit cost of less than \$500.
- b. Receipts/Invoices
 - i. Invoices or receipts must be provided for items in this budget category.
 - ii. ALL invoices/receipts must clearly show the following information:
 - 1. Vendor name
 - 2. Date
 - 3. Total amount owed
 - 4. An itemized list of what was purchased, if applicable
 - iii. If your organization is not claiming all of the items purchased, please indicate which item(s) on the receipt or invoice that you wish to claim. A quick explanation of what the receipt is for and which item(s) are being claimed helps ICJI process quickly and efficiently.
- c. Pro-Rating
 - i. As noted above, subgrantees can only request reimbursement for the percentage of each expense that is related to the grant program that is being funded. It may be necessary to pro-rate rent/utility/other costs between grants if your organization receives multiple grants from ICJI.
- d. Rental/Lease Costs
 - i. For rental/lease costs, a copy of the monthly invoice is preferred, but a copy of the rental/lease agreement showing the monthly rental/lease amount is acceptable if you do not receive a monthly invoice.
- e. Utilities
 - i. For utilities, your organization must provide copies of the invoices received from the utility companies showing the monthly utility costs.
- f. Employee Cell Phone Stipends
 - i. For employees that are given a stipend for cell phone usage, your organization must provide documentation showing that you paid the employee for the stipend as well as

some form of supporting documentation for the expense. Supporting documentation could include any of the following:

1. Copy of the employee's cell phone bill
 2. Request for reimbursement form from the employee
 3. Agency policy or agreement regarding employee cell phone stipends
- g. Bed Nights (SSBG grants only)
- i. Reimbursement for bed nights can be requested in this category. Sign in/sign out sheets (redacting client names) and spreadsheets showing what nights are being claimed for each client should be provided.

D. Equipment

- h. Equipment has an individual unit cost of greater than or equal to \$500.
- i. Receipts/Invoices/Bids
- i. ICJI requires purchase receipts or invoices as well as three competitive bids from vendors for all items in this category.
 - ii. If your organization makes a purchase utilizing a state-approved Quantity Purchase Agreement, three competitive bids are not required.
- j. Property Records
- i. Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property, who holds title, the acquisition date, the cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use, and condition of the property, and any ultimate disposition data including the disposal date and property sale price.
- k. Asset Tags
- i. Asset tags should be placed on any equipment purchased with grant funds and should include an identification number that can be linked to the information contained within the property records required by part c of this section.

E. Travel/Training

- a. State Policies
- i. Subgrantees must adhere to the State of Indiana's travel policies and approved rates or follow their local policies, whichever are more restrictive. Current information can be found here: <https://www.in.gov/idoa/2459.htm>
- b. Receipts
- i. You must provide receipts for travel expenses, including but not limited to hotel/lodging expenses, airline tickets, taxi/Uber/shuttle service, rental cars, employee mileage, and conference registration fees.
- c. Conferences
- i. If you attend a conference, ICJI requires a copy of the conference announcement, agenda, or other document that provides information about the conference and verifies that the conference was within the scope of the State or Federal grant.
 - ii. ICJI requires a copy of the hotel receipt and can only reimburse at the current State of Indiana lodging rates which are different for in-state and out-of-state hotels.
- d. Mileage Reimbursement
- i. ICJI can only reimburse at the current State of Indiana mileage rate.
 - ii. Mileage is to be calculated from the individual's home or office address (whichever is the shorter distance) to the destination address.

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- iii. A mileage reimbursement form is required and should show the date of travel, destination of travel, purpose of travel, and miles traveled. The mileage reimbursement form should be signed by the employee and approved by an approving official. A sample of an acceptable mileage log is attached to this policy.
 - iv. Proof of reimbursement of the mileage expense to the employee should also be included if applicable.
 - v. If an employee is driving a company vehicle or rental vehicle, the cost of the rental and/or fuel should be reimbursed rather than utilizing the mileage rate. The same information noted above should be provided as supporting documentation, as well as a copy of the invoice for the rental vehicle, if applicable.
- e. Meal/Per Diem Reimbursement
- i. If you have meals on your approved grant, you must follow the State of Indiana travel rules on per diem. Current Indiana per diem rates are as follows:
 - 1. In-State: Breakfast \$6.50, Lunch \$6.50, and Dinner \$13.00
 - 2. Out-of-State: Breakfast \$8.00, Lunch \$8.00, and Dinner \$16.00
 - ii. Overnight travel must be involved in order to claim meals. Overnight travel is not allowed unless the destination is more than 50 miles from the individual's home or place of employment. If a meal is provided as part of a registration fee or hotel room fee, you cannot claim that meal on your reimbursement request. In addition, alcohol purchases cannot be reimbursed.
- f. Lost Receipts
- i. If travel receipts are lost, the State's lost receipts policy may be followed. More information may be found at the link above.

F. Consultants & Contractors

- a. Consultant vs. Contractor
 - i. A consultant evaluates an organization's needs and provides professional advice and is limited to a rate of \$81.25 per hour or \$650 per day (8 hours @ \$81.25/hour = \$650).
 - ii. A contractor provides goods or performs services and is not subject to the above maximum rate.
- b. Reasonability of Costs
 - i. For both consultants and contractors, the cost must be reasonable based on the nature and scope of the service and the cost of similar services in the area.
- c. Executed Contract/Memorandum of Understanding
 - i. ICJI requires a copy of the signed agreement between the subgrantee and the consultant or contractor. At a minimum, this agreement must include the following information:
 - 1. Time period affected
 - 2. Duties of each party
 - 3. Pricing of goods/services (hourly rate, cost per item, etc. as applicable)
 - 4. Signatures of each party
- d. Invoices
 - i. ICJI requires an invoice that includes the following information:
 - 1. Vendor name
 - 2. Date(s) services were rendered
 - 3. Hours worked, if applicable
 - 4. Payment amount due for the services

5. A list of what service(s) the contractor/consultant performed for each date

G. Program Income

- a. Program income is defined as gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance.
 - i. Examples:
 1. Asset seizures
 2. Registration Fees
 3. Membership Dues
- b. Program income should be used to offset allowable costs and may only be used for allowable costs or activities.
- c. Verification Required
 - i. Subgrantees must show verification of program income – work with your Grant Manager to determine appropriate documentation depending on the type of income.
- d. Verification of Expenditures Required
 - i. The same documentation standards as above apply regarding budget items that program income is spent on.

VII. Match Documentation

Match is not required on every type of grant. 2 CFR Part 200.306 provides more information on match and the associated requirements. Supporting documentation for match has the same requirements as any expense you wish to have reimbursed by a grant. Any expenditure that is a legitimate expense that can be paid for with grant funds can also be used as match if it is listed as match on the approved grant budget. Items that are utilized for match are subject to the same supporting documentation rules that are detailed above.

In addition to all of the categories listed above, your organization can also use volunteer hours *if this is permitted by the grant*. For match purposes, volunteer logs must be signed by the volunteer and an approving official to confirm the hours were approved. In addition, the volunteer log should identify what tasks the volunteer performed. The hourly amount requested as match must be reasonable and similar to that of others performing the same job function. A sample volunteer log is included as an attachment to this policy.

For donations made to your organization to be used as match, your organization must use the fair market value to determine the allowable value of donated items. The Salvation Army, Goodwill, the IRS, and several other organizations have valuation guides available online to assist you in determining fair market value. A detailed donation log is required that shows the donor’s name, the date of donation, a list of the items donated, the number of items donated, each individual item’s value, and the total value of the entire donation. An example of a donation log is provided below:

Donor	Date of Donation	Items Donated	# of Items Donated	Item Value	Total Value
Jane Doe	1/1/20	Women’s Dresses	2	\$10.00	\$20.00
		Pampers	1	\$15.00	\$15.00
John Smith	2/4/20	Paper Towels	1	\$12.00	\$12.00
		Canned Goods	6	\$1.00	\$6.00
Total Value					\$53.00

VIII. Point of Contact

Any questions regarding the requirements set out in this policy should be directed to the subgrantee's assigned Grant Manager.

IX. Issuance

This policy is effective immediately. This policy will remain in effect unless and until canceled or rescinded by the Executive Director or their designee.

Attachments: Sample Ledger
 Sample Timesheet
 Sample Volunteer Log
 Sample Mileage Log

Approval:



Devon McDonald, Executive Director
Indiana Criminal Justice Institute

Date: December 30, 2021