



SASP & Pass-through Entities: Considerations for Administrators

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Introduction

This technical assistance document provides considerations and questions for state or territorial SASP administrators to assess and enhance their process of passing SASP funds to the sexual assault coalition. Even when SASP is passed through to the coalition, states and territories are ultimately responsible to the Office on Violence Against Women for SASP funding and activities and ensuring all necessary elements, as dictated by the [Uniform Guidance](#) are included in subaward packets. Therefore, passing SASP funding to the coalition for administering requires continual communication and monitoring of the processes, policies, and practices of the coalition's administration of SASP. The foundation of this communication should be a written agreement detailing how responsibilities are divided between the coalition and the administrator. It should delineate what the coalition is responsible for and what the administrator is responsible for as it relates to soliciting, allocating, distributing, monitoring, and reporting on how federal SASP funds are used.

The Importance of a Written Agreement

SASP administrators and coalitions often have informal, verbal, or organic agreements about passing through SASP. It is important to institutionalize these agreements in writing in the event of a change of personnel or capacity in either agency so funding and services are not interrupted and the practices are understood and sustainable. The written agreement can range in formality such as a contract or memorandum of understanding. What is important is that it exists and that it is specific to administering SASP funds. Without a written agreement outlining which pieces the coalition is responsible for and which pieces the



administrator is retaining, important information could be missed, funded programs could get mixed messages, services could be interrupted, SASP funding could be at risk, and ultimately survivors of sexual assault will suffer. To avoid confusion, the document should be clear about the roles, responsibilities, and activities for both the state administering agency and the coalition. The following sets of questions may help guide a conversation with the coalition in order to create a written agreement.

Questions to Consider for a Written Agreement with the Coalition Pre-Award

- Does the state administering agency retain the entire 5% administrative allowance?
- Does the state or territorial sexual assault coalition receive the entire 5% administrative allowance?
- Is the 5% administrative allowance split evenly or some other way between the state administering agency and the state or territorial sexual assault coalition?
- How does the written agreement address the rationale for how the administrative allowance is divided? How does this division align with the division of duties?
- How does the written agreement address activities the administrative allowance can be used for by the state or territorial sexual assault coalition?
- Who is responsible for crafting the solicitation or request for proposals?
- Who is responsible for releasing the solicitation or request for proposals?
- Who is responsible for conducting the pre-award risk assessments?
- Who has decision making power on awards?
- How will the applications be reviewed and who is responsible for organizing any kind of peer review process?
- Who will determine any eligibility restrictions or priority areas?



Questions to Consider for a Written Agreement with the Coalition

Payment Process

It is important to have a timely process for either advancements¹ or reimbursing the coalition, as they need to reimburse the programs in a timely manner so services for survivors are not interrupted.

- Who is responsible for creating the reimbursement process?
- Who is responsible for processing invoices from the subgrantees?
- What is the payment process for the coalition? For the subgrantees?
- What documentation is required?

Questions to Consider for a Written Agreement with the Coalition

Post Award

- What is the award making process?
- Who is responsible for executing the subaward packet with the subgrantees?
- Who is responsible for completing the administrative report for OVW?
- Who is responsible for preparing and uploading or mailing the subgrantee reports to [Muskie](#)?
- Who is responsible for programmatic monitoring?
- Who is responsible for financial monitoring?
- What forms and processes are used for monitoring?
- What is the administrator's process for monitoring the coalition's administration of SASP?
- How often will the state administering agency and the coalition be communicating and/or meeting to:
 - Identify the needs of the coalition in administering SASP funds;
 - Make and document award determinations;
 - Discuss grantee progress in meeting the deliverables and spending;

¹ [For more information on advancements and the requirements, please consult the Uniform Guidance and the DOJ Grants Financial Guide.](#)



- Identify training and technical assistance needs for the funded programs;
- Review the data and reports from funded programs; and
- Discuss monitoring decisions and outcomes?

Questions to Consider for a Written Agreement with the Coalition Sub-award Packets

- Who is responsible for ensuring that all necessary elements, as dictated by the [Uniform Guidance](#), are included in subaward packets for subgrantees?
- Who is responsible for relaying the special conditions to the subgrantees?
- Who is responsible for reviewing and approving reports and data submitted from subgrantees?

The considerations above are a starting point. Other questions and issues may arise that need to be addressed through a written agreement. To identify state or territory-specific issues to address, administrators should be actively engaged in dialogue with the coalition and the pass-through process they administer and knowledgeable about how SASP funding is implemented. One way to do that is to conduct regular meetings with the coalition to specifically discuss SASP, evaluate how the pass-through process is working, and adjust as needed. Another important way to identify matters to address is for the state administering agency to have a method for monitoring the coalition's pass-through policies, procedures, and processes.

Final Thoughts

Passing through SASP funding to the sexual assault coalition requires consistent communication through various methods. A written agreement is ultimately a communication tool to help coalitions and administrators be intentional about roles and documentation. Mutual expectations are the basis of healthy

NATIONAL SEXUAL ASSAULT COALITION

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relationships. As coalitions and state administrators navigate multiple roles with each other, having a written agreement adds needed structure and clarity to the relationship between administrators and coalitions and helps each institution do their best work.

The Sexual Assault Services Program (SASP) Technical Assistance Project, a program of the Resource Sharing Project, provides comprehensive technical assistance including tailored resources and assistance to support state administrators, state sexual assault coalitions, and sexual assault centers in their Sexual Assault Services Formula Grant Program implementation work. The SASP TA Project helps improve the capacity of OVW grantees and partners to ensure high quality services for sexual assault survivors across the lifespan by providing assistance in a variety of formats including consultations, site visits, webinars, newsletters, white papers, and national or regional meetings. For more information and resources, visit our [SASP page](#) and check out our [SASP Administrator Orientation Toolkit](#).

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