Meeting Notes

Participants

Debbie Bousquet (Arkansas), Natalia Bowser (Montana), Suzanne Breedlove (Oklahoma), Debra Cain (Michigan), Kristy Carter (Georgia), Sydney Cavender (West Virginia), Elizabeth Cronin (New York), Darryl Erickson (Wyoming), Nicole Fitzgerald (Idaho), MaryBeth Gagnon (Alaska), MaryEllen Garcia (New Mexico), Nick Gill (Kentucky), Cindy Grady (Wisconsin), Bobbi Johnson (Maine), Kelly Kissell (Colorado), Liam Lowney (Massachusetts), Kate Lyon (Arizona), Kelly McIntosh (Montana), Janelle Melohn (Iowa), Cecilia Miller (Minnesota), Cindy Mok (New Mexico), Kristin Morgan (Missouri), Cora Olson (South Dakota), Daisy Pagan (National Association of VOCA Assistance Administrators), Erika Pond (Nevada), Kellie Rabenhorst (Nebraska), Gary Scheller (Utah), Moises Valdez (New Mexico), Frank Zubia (New Mexico)

Presenters

Kathrina Peterson (OVC), Suzanne Breedlove (Oklahoma), Janelle Melohn (Iowa), Brian Sass-Hurst (OVC), Lucy Mungle (OAAM), Silvia Torres (OVC), Joel Hall (OVC), Frank Zubia (New Mexico), MaryEllen Garcia (New Mexico), Lynn Sanchez (Life Link, New Mexico), James Simonson (OVC), Mary Vail Ware (OVC TTAC), Kathleen Demro (OVC TTAC), Kristopher Brambila (OGC), Darlene Hutchinson (OVC)

Office for Victims of Crime (OVC), Office of the General Counsel (OGC), Office of Audit, Assessment, and Management (OAAM), and Office for Justice Programs (OJP) Personnel

Gary Barnett, Kristopher Brambila, Shelby Jones Crawford, Joel Hall, Darlene Hutchinson, Lucy Mungle, Kathrina Peterson, Brian Sass-Hurst, James Simonson, Silvia Torres

Office for Victims of Crime Training and Technical Assistance Center (OVC TTAC) Staff

Mary Vail Ware, Kathleen Demro

Day 1: November 6, 2019

8:00–8:30 a.m.	Meet and Greet
8:30–8:35 a.m.	Welcome Frank Zubia, Director, New Mexico Crime Victims Reparation Commission MaryEllen Garcia, Grants Bureau Chief, New Mexico Crime Victims Reparation Commission

8:35–10:15 a.m.	Introductions and Discussion With Administrators: Challenges and Need Facilitator: Kathrina Peterson, Acting Deputy Director, State Compensation and Assistance Division, OVC

Ms. Peterson asked administrators to describe the challenges they are experiencing in their states and what they need from OVC to meet those challenges.

Kentucky:

- Training for subrecipients
- Tools to monitor effectively

South Dakota:

- Provide clarity to subrecipients on service definitions
- Trauma-informed and victim-centered training for service providers (they have available resources, but the right people don't always come)

Other attendees reported they needed similar training for Child Advocacy Centers, multidisciplinary teams, and allied professionals.

Idaho:

- Assistance in communicating changes to subrecipients
- Working on internal policies and procedures (P&P)
- Subrecipients report housing (emergency, transitional) as the top need
- Training on the intersection between substance use disorder and domestic violence

Missouri:

- Funding agency transition issues
- Internal P&Ps
- Strategic planning

Massachusetts:

- Significant leadership succession at subrecipient organizations; how to train and support the next generation of leaders to build the field; need funding opportunities for State Administering Agencies (SAA) to design and deliver training to meet that new leadership challenge
- Founder-led and survivor-led organizations may disappear without support; they need professional development training (e.g., grant writing, public speaking, financial management)

When asked, most attendees agreed that the 5-percent administrative funds are not covering current SAA needs because they have to staff up to meet all funding administration requirements.

New York:

- They set up their own version of TTAC to offer training on all the technical skills (e.g., strategic planning, grant writing)
- They want to encourage their subrecipients to adopt more evidence-based practices, but the research is lean—can OVC provide this information?
- Need to address survivors with drug addiction in a way that meets the guidelines
- Strict state procurement rules make it very difficult to staff up (often takes 6+ months)
- Please stop taking VAWA out of VOCA
- Different agencies administer various federal funds differently—can OVC make the rules match better?

Ms. Peterson offered that there are discretionary funds to help states with the opioid crisis (Massachusetts working with that TA provider).

Ms. Ware reminded attendees that OVC TTAC can provide TA to subrecipients one-on-one and can help connect VOCA staff to additional resources.

An attendee asked, "If a subrecipient contacts OVC TTAC for assistance, do you notify the SAA?" Ms. Peterson responded that they should be notified.

Nevada:

- Responding to the Office of the Inspector General (OIG) audit
- Internal restructuring of funding; different funds have different levels of internal controls
- Want to get more VOCA funding to tribes (only two receive funds now) and victim service providers in rural areas
- Struggling to get new agencies up and running (they may not have other sources of funding, so they're not immediately eligible for VOCA)
- High turnover on grants management staff
- Need help using risk assessment to deploy the staff we have appropriately
- Growing the victim assistance academy
- Increasing advocate numbers in allied professional offices
- They meet regularly with staff of other funding agencies to collaborate on strategies

Montana:

- Strategic planning
- Internal P&Ps
- The victim assistance academy closed, so they need to train new advocates
- No state general funds supporting victim services; funding agency board needs help prioritizing supporting core services and new initiatives
- Need help assessing subrecipient sustainability

Nebraska:

- No state general funds
- 5 percent doesn't stretch far enough because staff is 100-percent federally funded and their responsibilities keep increasing

West Virginia:

- Internal P&Ps
- Recent merger; hard to change past funding patterns
- Only one dedicated VOCA staff person, and all processes are still paper based

Colorado:

- Leadership succession and staff turnover (staff either have 20+ years tenure or less than 3)
- LGBTQ community lost its primary advocacy agency, and they distrust government funders
- Exploring other grant management systems
- Coordinating with other state agencies and coalitions to fund tribes to reduce multiple site visits

Mr. Simonson gave an overview of the Tribal Financial Management Center.

- TTA for any states that have tribes
- Coordinating with OCFO and OAAM to do site visits (20 so far)
- Provides needs assessments and offers resources
- Sent a survey to tribal set-aside grantees

An attendee asked if OVC could notify the SAAs when supporting tribes in their states. There are different rules between states and OVC requirements (e.g., 100-percent documentation for reimbursement), and tribes don't understand the differences.

An attendee offered that there is confusion about whether tribal victims can apply for/receive compensation assistance from the tribal perspective, as they often do not want their members applying for state funds since they consider themselves sovereign nations.

An attendee recommended that states with tribes need a dedicated full-time staff person just to focus on relationship building so the tribes will accept funding, and then help build their capacity to manage the funds.

Mr. Simonson responded that they can better coordinate between OVC, the SAAs, and tribes.

Ms. Peterson offered that there may be discretionary funding coming to support up to 16 advocacy agency liaison positions in SAA offices (rural, tribal, elderly, violent crimes); the solicitation will hopefully be posted early next year; OVC will circulate the link to the public grant forecaster site. It can be found here: https://grantsnet.justice.gov/programplan/html/Solicitations.htm.

Arkansas:

- Connecting with tribes
- No state general funds for subrecipients
- Working on succession planning with a small group of founder-led programs (founders who don't want to let go)

Wisconsin:

- OIG audit
- Working on evaluation methods, data collection methods, developing priority areas, and a needs assessment
- Monitoring subrecipients effectively with limited staff
- They fund coalitions to do capacity building training
- Their grants management system may be changing, even though it works well for them
- Funding two tribes for the first time this year; the tribal coalition is not able to provide capacity building

Iowa:

- Leveraged TTA to help build subrecipient capacity thanks to discretionary funding
- Want to know more about successful new programs (e.g., restorative justice, serving incarcerated survivors)
- There is a huge TTA gap for SAAs (peer-to-peer mentoring is not enough); need model tools and templates and policies

Minnesota:

- Doing first needs assessment with statistical analysis center
- Looking at P&Ps with an equity lens
- The needs assessment will help inform how they fund in the future (potentially shifting funds while resources decline); doing outreach and listening sessions
- Grantees don't always have the capacity to manage federal funds
- Need more than 5 percent administrative funds
- Request for OVC TTAC: need high quality board training that can be done online, especially for small or umbrella agencies (board members don't understand their fiduciary responsibilities, and/or they micro-manage their staff leadership, and/or they don't understand how to govern victim service provider agencies); they would like to require annual board training for their subrecipients

Georgia:

- Hard to find qualified, passionate SAA staff; need onboarding training for new staff
- Limited subrecipient capacity

- Hired a director of strategic partnerships to work with high-risk subrecipients
- Need technology systems upgrades
- Facing upcoming state budget cuts
- Coalitions have capacity issues too
- Looking for HIV/prophylaxis models and guidance on forensic medical exam reimbursements (what should be covered, e.g., injuries outside of the exam)

Michigan:

- Subrecipient confusion about confidentiality (designing protocols for CAC/MDT confidentiality)
- How to stabilize or wean off newly funded agencies
- Big pendulum swing between victims' rights and offenders' rights; working through 11,000+ backlog of rape kits
- Dealing with political issues, other departments coming after their money

Utah:

- Success with tribes when they connect through health networks/medical providers
- State auditor now monitors the OIG audits from other states and asks the SAA to respond to all the issues that have been raised in other states
- Need VOCA guidelines, intent language
- State legislature pushes back on federally funding FTEs: who is going to fund them all when the federal funds decline; need a conceptual guide for legislators
- Making a huge push to visit all subrecipient sites in response to state single audit
- Made significant grant to state sexual assault coalition to do training for forensic nurses

Wyoming:

- Great working relationship with legislature

Alaska:

- Recovering from major agency overhaul (new director and staff, lost grant management historical knowledge)
- Would have liked model practices instead of always having to lean on other SAAs
- Board training
- Sustainability training
- While their victim services money is steady, social services funding has been slashed; push back from coalitions about funding reductions; want guidance from OVC to share in the state because subrecipients don't believe them

Arizona:

- P&Ps

- Board training
- Would like products in response to OIG report recommendations (e.g., some clarity on costs)
- Trying to use data to paint the big picture without any statistical support; if any state has done that please share
- They used an OVC Consultant to create a 5-year strategic plan
- State pushing to go to one grants management system that works for all departments (probably not realistic)
- Need help moving into 2018 money with special condition on breach of personally identifying information P&P, concerned about smaller agencies

Oklahoma:

- Criminal justice reform movement has led to commuting sentences, which triggers victims
- Would like OVC TTAC to develop a civil legal services toolkit; they need a lot of TTA (Ms. Peterson says Vermont is working on this)
- Most agencies are 70 percent reliant on funding sources—could there be a website with all victim services funding opportunities? (grants.gov is not easy to navigate)

Maine:

- Recent structure and leadership changes and new distribution of responsibilities
- Looking at old promises to subrecipients versus priorities of the new administration; having multiple meetings with subrecipients to discuss this
- As a result of a recent OIG audit, they are working on a needs assessment and P&P manual
- Looking at innovative funding opportunities
- Subrecipients are struggling to meet requirements and expectations

Montana:

- Rural victim services
- Looking at new grants management system
- Trying to find efficiencies for staff so they can use their time more effectively
- Beginning tribal consultation and implemented a standing tribal committee on their agency's board

New Mexico:

- Balancing all of the day-to-day SAA responsibilities with training new staff, supporting existing victim service providers, identifying new efforts, and building organizational capacity/sustainability/increased internal controls—how do we continue to do all of that?

Ms. Ware shared that OVC, OVC TTAC, and the National Association of VOCA Assistance Administrators are working together to provide more support to SAAs; OVC TTAC is also launching additional resources,

e.g., online financial management training, in-person sustainability training, an online monitoring "toolkit."

10:30 a.m.–12:00 p.m.	Funding Realities: A Look at Where We Are and Where We Are Headed Facilitator: Kathrina Peterson, OVC Presenters: Suzanne Breedlove, Director of Victim Services, Oklahoma District Attorneys Council Janelle Melohn, Director, Office of the Attorney General of Iowa

Ms. Peterson provided hard copies of slides on the analysis of victim assistance funding trends (PowerPoint attached). She reminded the group about the importance of expanding victim services and the disappointment of local advocates regarding returning VOCA funds. She reviewed the intention of OVC to fund innovative services and to expand services to different organizations and in a variety of areas such as housing, civil legal assistance, substance abuse services for victims, etc.

The OJP funding forecaster for the 2020 OVC Program Plan can be found here: https://grantsnet.justice.gov/programplan/html/Solicitations.htm.

Ms. Peterson reminded the group of the exciting large increases in subrecipients and the number of victims served between 2014 and 2018. She advised that now is a time for reflection on where the field has been and where it is going.

The trends, after the 2014 increase, show that states have progressively spent current year funding at lower rates, with 95 percent of states having a remaining balance from 2016 as of October 10, 2019.

A state administrator advised that sometimes money is obligated but not moving due to state internal or subrecipient issues/logistical hurdles.

State administrators discussed the challenges of timing between state and federal grant processes. They discussed the trend of subrecipients returning funds because they were unable to expend funds as planned.

Ms. Peterson shared that $325 million in 2016 funds are on track to be de-obligated. They will be returned to the Crime Victims Fund.

Presenter and Iowa Assistance Administrator Janelle Malone pointed out that funding returns can harm victims and that the non-expenditure of funds may send the wrong message to Congress about the need for victim services.

Administrators discussed the challenges of ensuring incremental sustainable funding in the face of fluctuating amounts from the Crime Victims Fund.

State administrators requested information in writing from OVC relative to spending priorities that can be shared with their leadership.

Presenter and State VOCA Administrator Suzanne Breedlove shared that Oklahoma has not de-obligated any federal money from the increase years, and they are reserving some funds for future years. She discussed concerns about dependency of local programs on VOCA funds. Oklahoma did use funds to fund new programs and spent the oldest money first.

Ms. Breedlove also advised Oklahoma grants are on an annual basis and her staff follows burn rates, so they can re-allocate quickly if subrecipients are not spending as planned.

Ms. Malone discussed her strategy to educate her state decisionmakers on the impact of VOCA funds in Iowa. She discussed developing an annual report and graphics that can be shared.

Both Ms. Malone and Ms. Breedlove discussed that they spend their state funds frugally to reserve them for priorities that might not be covered by other funds.

Ms. Malone advised that they do a 3-year funding cycle and have the ability to re-allocate unspent funds during the 3-year cycle. She is working with her subrecipients to plan for possible decreases. She shared that New Mexico is using strategic planning to ensure funding continuity through 2024.

Ms. Malone discussed ensuring that internal staff and external stakeholders are discussing joint messaging around funding and programming. She advised her colleagues to start having strategic conversations with all stakeholders so that any shifting of money and priorities can happen in a planful way.

New Mexico administrators discussed how to plan for funding reserves across active federal programs to try to maintain steady funding of priorities for as long as possible. They had a strategic planning process and included stakeholders to determine funding priorities. They plan to keep stakeholders in the loop regarding funding changes and challenges.

The administrators discussed the need to set funds aside for disasters and mass violence incidents so that funds can be deployed quickly in emergencies.

Ms. Peterson advised that OVC is ready to assist if there are challenges with OIG audits. State administrators have had good results with the audits if they discuss their decisionmaking with their OIG auditor in accordance with the VOCA rules during the audit process.

1:30–2:30 p.m.	Ask Lucy: Now What? FAQs and Best Practices on Supporting High-Risk Subrecipients	
	Facilitator:	Brian Sass-Hurst, Grants Management Specialist, OVC
	Presenters	Lucy Mungle, Risk Management Analyst, OAAM

Ms. Mungle provided a PowerPoint presentation (attached). Below are some key points from the presentation.

There are three types of risk assessment: pre-award, post-award, and DOJ-designated high-risk grantee.

- Pre- and post-award risk assessments are done on a regular basis, reviewing unique risk indicators
- DOJ-designated high-risk grantees: a problem has definitively occurred; they have been notified of the problem and the steps they need to take to resolve the problem

There are numerous ways to assess risk: USAspending.gov (are they receiving other federal funds?); past history with grantee; timely, accurate reporting; tracking in spending versus performance; audit results and 990s; financial capability questionnaire, etc.

1st case study: smaller agency, few staff, less sophisticated systems; highly needed services; worth funding again, if we can mitigate the risk (risk mitigation might be a standard response or tailored, as it was in this case).

2nd case study: repeat audit findings, past complete failure of IT system with no plan for backing up data; due to numerous systemic issues, they would likely not be able to manage an award successfully; any funding would be contingent on significant special conditions.

Arraying the scores to determine risk categories: look for natural breaks to determine levels of risk.

An attendee asked if Ms. Mungle could share their risk indicators. She will see if that is possible.

2:45–3:45 p.m.	Innovative Programming and Monitoring Facilitators: Kathrina Peterson, OVC Silvia Torres, Victim Justice Program Specialist, OVC Joel Hall, Victim Justice Program Specialist, OVC Presenters: Frank Zubia MaryEllen Garcia Lynn Sanchez, Program Director, Life Link Human Trafficking Aftercare Program, and Co-Chair, New Mexico Human Trafficking Task Force Task Force

Mr. Zubia discussed his state and the agency's journey to fund programs that provide direct services to human trafficking (HT) victims. New Mexico uses a combination of state appropriations, VOCA funds, OVC discretionary funding, and other funding sources, such as the U.S. Department of Housing and Urban Development, to fund these programs.

Ms. Garcia discussed becoming more involved in statewide planning for victims' services and having dialogue with stakeholders across the state. They are re-evaluating how they work at the state compensation and assistance level with service providers as well as victims. They are working to leverage both compensation and assistance dollars to assist with stabilization services with HT survivors.

Ms. Sanchez discussed the complex trauma that HT survivors experience and the variety of basic needs that are required by these victims to help them move to stabilization. Evidence shows that low barrier housing increases a survivor's chances of survival. Ms. Sanchez focused on housing and safety needs of survivors and the challenges in providing them. She also talked about the poor outcomes that can be associated with trafficking experiences (PowerPoint attached).

Most funding for this program is being directed toward transitional housing for victims.

An attendee asked if New Mexico would share its MOU with a collaborative partner; Mr. Rubio said yes.

The stakeholders are working on providing a statewide multidisciplinary response to HT. State administrators discussed the challenges with training and bringing in law enforcement.

Mr. Hall and Ms. Torres discussed what they are looking for from a compliance and programmatic perspective when conducting site visits of programs like the one described by the panelists.

Mr. Rubio discussed how they all work together to get to "yes" as a service-providing team.

3:45–4:30 p.m.	Interactive Discussion: What's Happening at OVC/OJP and Its Impact on You (Part I) Facilitators: Kathrina Peterson, OVC James Simonson, Associate Director, Operations Division, OVC Topics: • New "Unified Financial Management System" • Justice Grant Innovative Information Technology o Solution (JGIITS) o Performance Measures o Administrators Steering Committee • Monitoring Site Visits • Solicitation Timeline

Mr. Simonson shared a PowerPoint presentation on the new Unified Financial Management System (attached) and answered questions from attendees. OVC will be seeking advice and feedback throughout the migration process and will be asking for volunteers to do user testing.

Ms. Peterson added that OVC will be asking SAAs if they should change the performance measures now or wait (if it would create undue burdens on SAAs).

In response to an attendee's comment about uniform definitions, Mr. Simonson reported that OVC is drafting guidance.

An attendee raised the concern that subrecipients might incur costs to modify their systems to respond to either changes in performance measures or to communicate with the new financial management system.

Attendees offered that they would appreciate revisiting the performance measures so that the states can capture information on all allowable services.

Day 2: November 7, 2019

8:00–8:30 a.m.	Meet and Greet
8:30–10:00 a.m.	Working Group Review of OVC Monitoring Resources for Administrators Facilitators: Brian Sass-Hurst, OVC Lucy Mungle, OAAM Mary Vail Ware, Project Director, OVC TTAC Kathleen Demro, Lead Training and Technical Assistance Specialist, OVC TTAC

Ms. Demro presented the draft monitoring toolkit to the group and discussed the history of development of the project (slides attached).

Administrators asked for sample policies and procedures to accompany the other tools on the monitoring page.

Ms. Mungle discussed what to do when the risk assessment is complete. She discussed how scores should be arrayed to give the data meaning (see slides). The array should help administrators determine the types of assistance that different types of grantees might need. In addition, there may be a reason for high risk, such as the sheer amount of money given to the grantee. A high score might not mean monitoring is needed, but a justification should be provided. Use the words “issues for resolution” instead of “finding.” Monitors should be considering the length of time to resolution of issues in their risk assessments.

Ms. Mungle advised that sometimes programmatic monitors do some limited financial monitoring to determine if the administrative structure of the agency is solid. If the grantee cannot easily produce some financial data, then a financial review should be considered. She also shared a sample grantee scorecard that allows monitors to view what is driving the risk score.

10:15-11:30 a.m.	Interactive Discussion: What's Happening at OVC/OJP and Its Impact on You (Part II) Facilitators: Kathrina Peterson, OVC James Simonson, OVC Kristopher Brambila, Assistant General Counsel, Office of the General Counsel Topics • OIG, OJP, and You • Special Conditions • Allowable Costs

Mr. Brambila reviewed several of the newer special conditions for OJP awards in 2019.

- Employment eligibility verification for hiring under the award
  - This condition to verify employment eligibility for grant-funded staff mirrors general federal requirements. The special condition does not require states to use the E-Verify system if the I-9 forms are completed and on file.
- Requirement to report actual or imminent breach of personally identifiable information (PII)
  - This special condition requires organizations to have procedures to respond to a data breach. The procedure should require subrecipients to notify their VOCA administrator of any breaches, who, in turn, must notify OVC.
- Unreasonable restrictions on competition under the award; association with federal government
  - This special condition requires VOCA-funded states and subrecipients to set reasonable expectations on competition for procurement purposes.
- Determination of suitability to interact with participating minors
  - Commonly known as the "background check" special condition, OIG discovered wide variation in approaches to conducting background checks on persons working with minors.
  - A background check is required whenever a grant-funded project plans to engage with minors. Any adult in the program is considered a covered individual, unless there is only brief, incidental contact, or an adult who has successfully completed the background check process is present to accompany the minor.

- VOCA administrators are encouraged to bring any questions or issues to OVC to share with the team that is working on this special condition.
- The FBI background check is the gold standard, and states may ultimately be required to administer federal-level background checks, but they are working on a way to make this easier.
- The background check must include at least a 5-year look back in the states where the person has lived and worked. Fingerprints are not required but they are preferred.
- The background check can be no more than 6 months before the award.
- An attendee asked who will cover these additional costs. Mr. Brambila responded that award funds may be obligated for this purpose.
- An attendee asked what is considered a disqualifying background check. Mr. Brambila replied disqualifying conditions include the person not consenting to the background check, the person falsifying information, the person appearing on the National Sex Offender Registry, and the person being convicted of certain crimes.
- An attendee asked about two situations that have come up in her state.
    1. This special condition has been a significant burden for rural CASA programs. These programs are already struggling to keep volunteers, and now those volunteers may have to make a 4-hour one-way trip to be fingerprinted.
    2. Subrecipients want to know if there is an exception for minors who engage with other minors, e.g., in a peer support program.
    3. Ms. Peterson asked all attendees to email her with specific feedback and examples so she can forward it to the working group to help them provide additional guidance and consider exceptions.
- An attendee asked if written verification is preferred; the answer was yes.

Ms. Peterson initiated a discussion about OIG site visits and reports. She encouraged states to communicate with their grant managers throughout an OIG audit process, from notification to site visit to draft and final reports to remediation of findings. Grant managers can help states navigate all the stages of the audit. Although they receive notice that the OIG is starting the process, they typically do not receive any additional information until the draft report is submitted.

Ms. Peterson encouraged states to ask the OIG auditor how they came up with their recommendations if it is not clear (e.g., lack of supporting documentation, the valuation of attorney time).

An attendee asked how they can get something taken out of the report even when the OIG auditor admits that the finding is wrong. Ms. Peterson commented that this has happened before, and it is another reason why it is helpful for states to work closely with their OVC grant managers during the whole auditing process.

11:30 a.m.–12:00 p.m.	Closing and Adjourn Darlene Hutchinson, Director, OVC

Ms. Hutchinson thanked the attendees for all the challenging and important work that they do. She thanked OVC, OVC TTAC, and New Mexico Crime Victims Reparation Commission staff for all their efforts to put on a great meeting.

Ms. Peterson thanked the attendees for their level of engagement and participation. She also thanked Shelby Jones Crawford and OVC TTAC staff for planning the meeting.

Ms. Ware asked all attendees to complete evaluations before leaving.

Summary of Challenges and Opportunities

Challenges VOCA Administrators Face and Opportunities for OVC To Assist

This is a summary of the issues and challenges shared by VOCA State Administering Agencies (SAA). The items are ordered by those mentioned most often. A more detailed state-by-state breakout is in the meeting notes.

Challenges:

- Developing policies and procedures (P&P)
- Internal management structures
- Reaching and developing relationships with tribes
- Building management capacity and internal control structures for small/new/struggling subrecipients
- Helping subrecipients develop sustainability plans and diversify funding
- Leadership development and succession planning for the field
- OIG audits
- Many states struggle with limited state resources
- The 5-percent allowable administrative costs from VOCA dollars are insufficient for state structures and staffing
- Technology to support grant management (either lack of systems, or state systems that do not meet management needs)
- Providing monitoring in an impactful manner
- Developing systems to pay reliably for HIV prophylaxis for sexual assault victims
- Offender assistance issues (how can offenders who are also victims be assisted) and how is restorative justice impacting other available services?
- Training subrecipients: ensuring training is based on evidence and is relevant to their work (trauma-informed, victim-centered, understanding roles and responsibilities of all players in the criminal justice system, etc.)
- Defining service areas
- Developing and maintaining relationships with the LGBTQ population and other underserved populations
- Provision of housing resources
- Addressing the intersection between victimization/victims' needs and the opioid crisis
- Procurement/civil service rules
- Moving subrecipients to new rules
- Fostering innovation with subrecipients
- Risk assessments
- Growing advocates in law enforcement agencies
- Strategic planning

- Managing 100 percent documentation requirements from subrecipients as a result of OIG audits
- Developing good needs assessments
- Ensuring equity in funding across victims' needs
- Finding passionate, qualified staff
- Working with victim notification systems
- Forensic medical exams (determining good models and appropriate costs)
- Developing and implementing confidentiality and Personally Identifying Information (PII) model policies and practices
- Difficult funding choices on the horizon
- Using risk assessment data for funding decisions may cut out tribal and other developing agencies and programs
- Rural service provision
- Uphold and uplift organizations and each other

Opportunities:

- Model P&Ps for states to adapt and use
- Written guidance from OVC that can be shared in talking with state officials about best practices in VOCA administration, expectations, and intent of VOCA funds (perhaps develop a conceptual guide on federal VOCA for state leaders)
- Need assistance communicating changes to subrecipients
- Guidance on documentation requirements for subrecipients
- Discretionary funds for training, technology development, and other capacity-building activities
- Develop a training for the boards of victim-serving agencies that details their roles, responsibilities, and connections to the mission of the agency
- Data analysis assistance/tools/examples/infographics
- Coordination with federal tribal grants and VOCA grants
- Make the rules match between VOCA and VAWA
- Assist during the OIG audit process
- Develop training for founder-led organizations to promote succession planning
- Would like ways to share excellent, effective programs to fund
- Help further define and capture service units
- Involve law enforcement, child advocacy centers, and prosecutors in training
- Funding opportunities for leadership development
- 1:1 assistance for subrecipients
- Identification and provision of evidence-based training
- More tools available for SAAs on OVC TTAC site
- Telemedicine for forensic exams
- Models for strengthening service systems across systems of care
- Develop civil legal services evaluation
- One-stop shop for grant resources for subrecipients

VOCA Victim Assistance Regional Meeting

Santa Fe, New Mexico

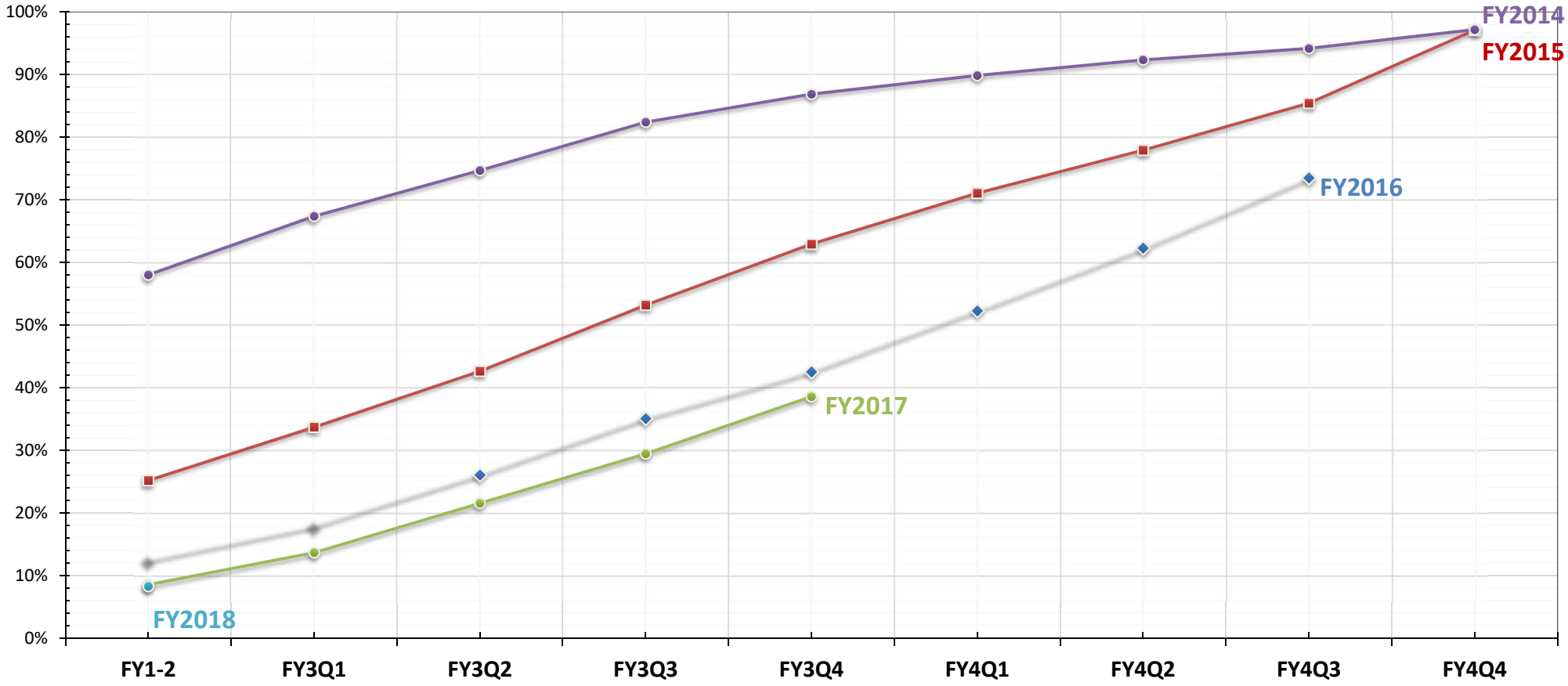
November 6 & 7

Analysis of Victim Assistance Spending

- Overall, initial spending rates (year of award plus 1st year) have decreased since FY2014
  - FY 14 – 58.02%
  - FY 15 – 25.17%
  - FY 16 – 12.39%
  - FY 17 – 8.54%
  - FY 18 – 8.26%
- Spending rates for the remaining two years of the award increased from FY2014 to FY2015
- FY2015 awards closed out at roughly the same level as FY2014 awards (97% of funds spent)
- Currently 73.5% of FY2016 funds have been spent, though this number will change as complete spending data for FY2016 awards will not be available until December 30, 2019

NOTE: All data in this presentation comes from grantee reported outlays on their quarterly FFRs as of October 10, 2019

Cumulative Spend Rate



Of the 56 FY2016 State and Territory Awards

73% *(41)* Started spending their award in FY2017

23% *(13)* Started spending their award in FY2018

4% *(2)* Started spending their award in FY2019

5% *(3)* Spent their entire award by FY2019

95% *(53)* Have a remaining balance as of 10/10/2019

NOTE: All data in this presentation comes from grantee reported outlays on their quarterly FFRs as of October 10, 2019

Of the 53 FY2016 awards with a remaining balance of 10/10/19

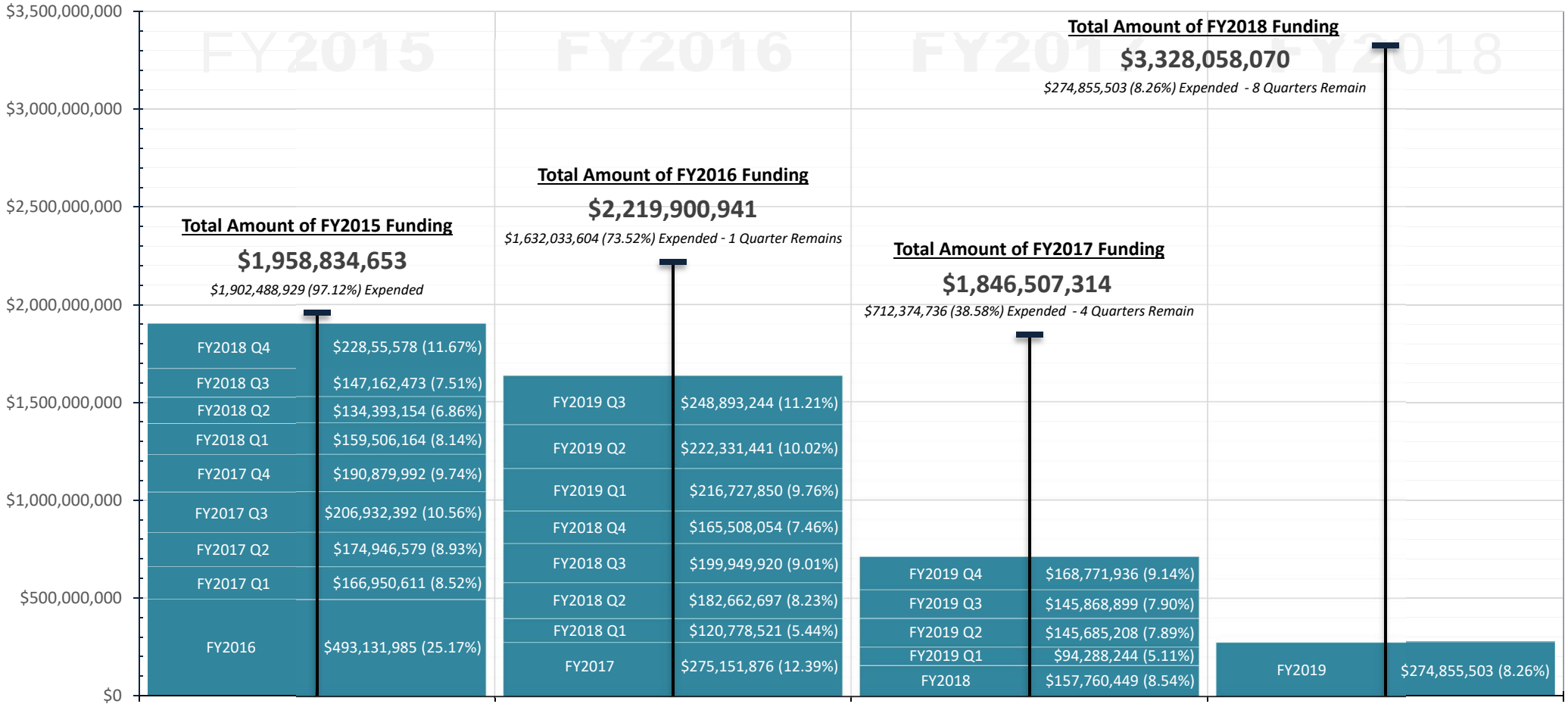
24% *(13)* Have less than 10% remaining

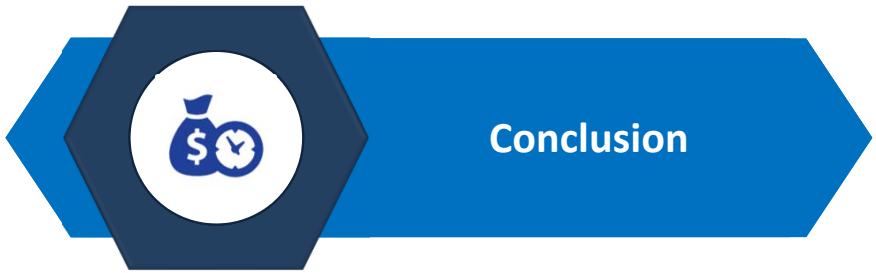
42% *(22)* Have between 10% and 25% remaining

34% *(18)* Have more than 25% remaining

NOTE: All data in this presentation comes from grantee reported outlays on their quarterly FFRs as of October 10, 2019

Analysis of Victim Assistance Spending (FY2015-FY2018)



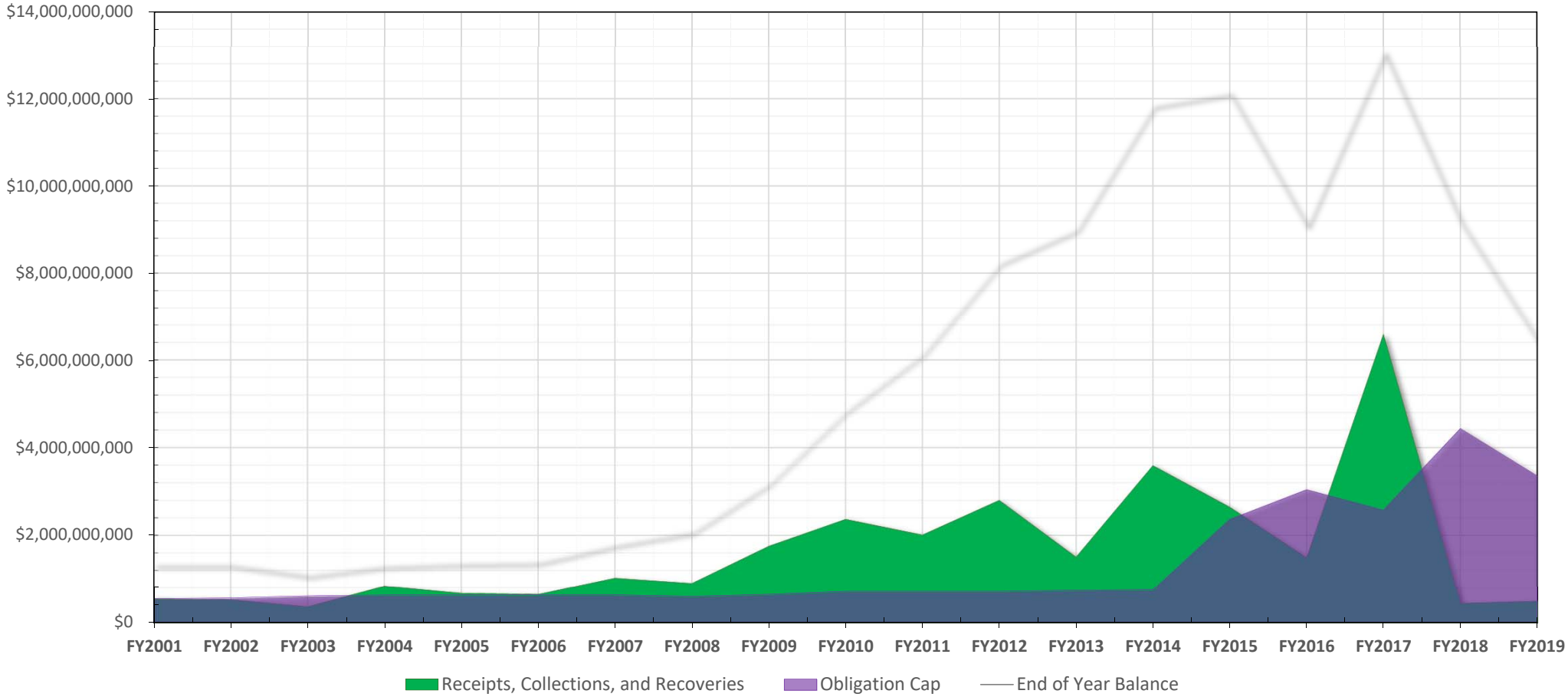


Based on current trends, it is projected that

- Only 85.32% of FY2016 funding will be spent. Meaning $325,881,458 (14.68%) of FY2016 funding will be "de-obligated"
- Early analysis indicates that spending of FY2017 funding is following a similar trend

NOTE: All data in this presentation comes from grantee reported outlays on their quarterly FFRs as of October 10, 2019

The Criminal Victims Fund (CVF) Historically – The Cap & Deposits



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Office of Justice Programs
U.S. Department of Justice

HIGHER RISK SUBRECIPIENT MANAGEMENT

Lucy Mungle
Risk Management Analyst
U.S. Department of Justice
Office of Justice Programs
Office of Audit, Assessment and Management

Case Studies

Unique Risk Indicators:

1. Designated High Risk Grantee
   a. Single Audit report
   b. Unresponsive to requests regarding questioned costs
   c. Referred to US Treasury for Debt collection
2. History of no-cost extensions
3. Progress report delinquencies

Case Studies

Risk Mitigation

1. Grants financial management training – withholding special condition
2. Repay questioned costs prior to being able to draw funds
3. Special condition requiring the tribe to submit adequate policies and procedures for determining federal award draws.
4. Submission of detailed general ledger with quarterly financial report.
5. Provide training and technical assistance

Case Studies

Unique Risk Indicators:

1. Adverse Single Audit
    a. Auditor's inability to obtain "sufficient appropriate audit evidence".
2. Material weaknesses (repeat findings)
    a. inadequate internal controls in place to reconcile subsidiary ledgers to control ledger amounts in the general ledger
    b. Inadequate inventory of capital assets. However, this award does not anticipate the purchase of equipment.
    c. IT infrastructure lacks key controls such as disaster recovery, user set up and termination and a general lack of written policies and procedures.
    d. Not checking for suspension and debarment during procurement actions.

Case Studies

Unique Risk Indicators:

2. Material weaknesses (repeat findings)
    a. Inadequate controls in place to ensure that all required reports were supported by underlying accounting records and that all supporting documentation was maintained.
    b. Inadequate supporting documentation for tested expenditures and payroll.
    c. Inadequate documentation supporting eligibility determinations.
    d. Self reported designation as high risk by another federal agency.
    e. Significant questioned costs from another federal agency audit.
        a. Audit indicated accounting system “unreliable and in disarray”.

Case Studies

Risk Recommendation:

In accordance with 2 CFR 200.205, Federal awarding agency review of risk posed by applicants, OJP has evaluated the risk posed by this applicant against the pre-award risk criteria published in the solicitation which included such items as the following:

1. Financial stability
2. Quality of management systems and ability to meet the management standards prescribed in 2 CFR 200
3. History of performance
4. Reports and findings from audits performed under 2 CFR 200 Subpart F – Audit Requirements
5. Applicant's ability to effectively implement statutory, regulatory or other requirements imposed on non-Federal entities.

Case Studies

Risk Recommendation:

Based on the pre-award risk evaluation this organization appears to have significant systemic issues which likely will affect their ability to effectively implement and manage this award successfully.

If funded, special conditions will be placed on the award, in-depth monitoring will be conducted within the first 12 months after funds are being expended, and the entity will be referred for training and technical assistance for grants financial management assistance.

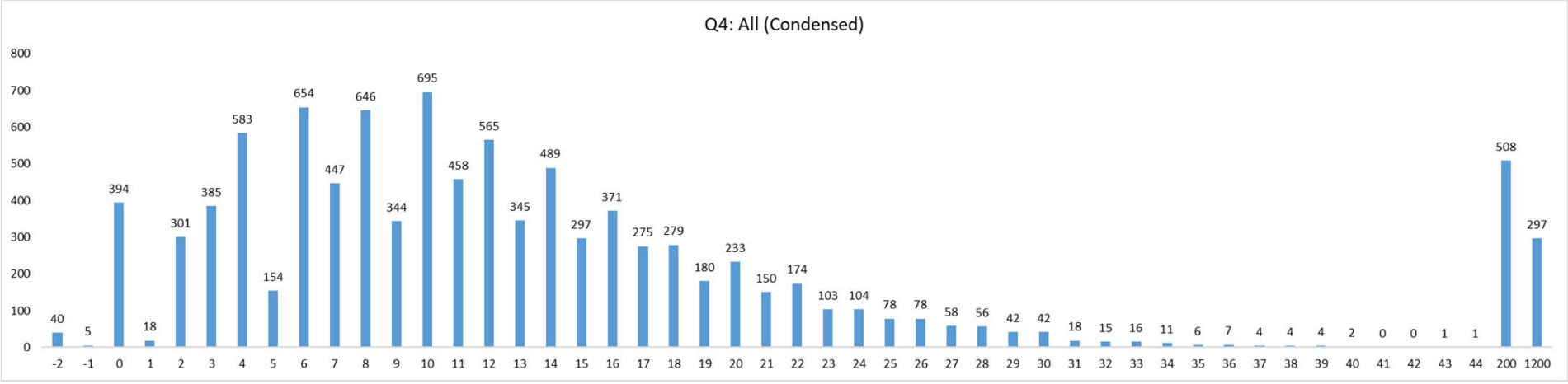
Case Studies

Special Conditions:

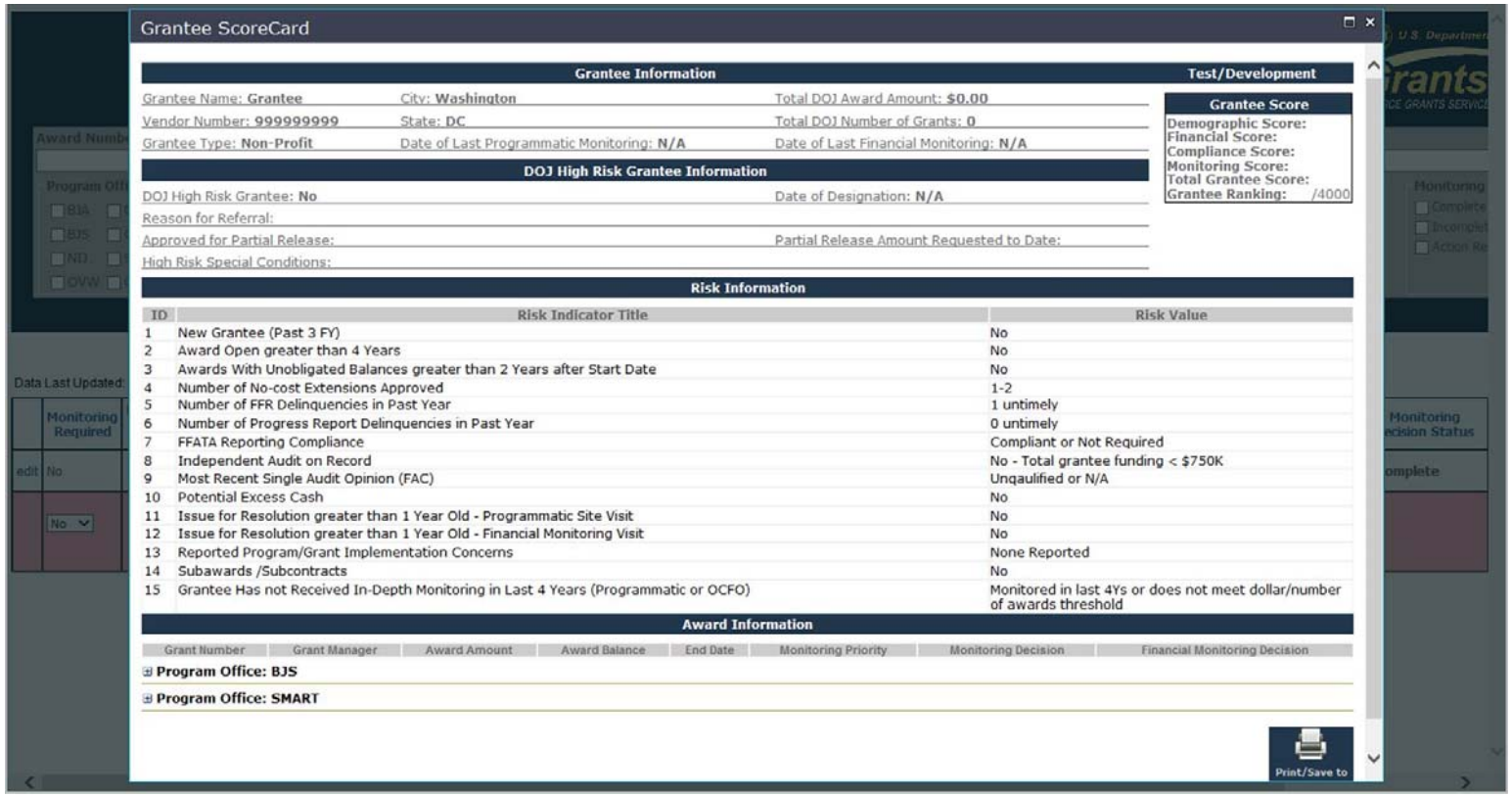
The following pre-award risk special conditions will be applied.

1) Documentation on request,
2) 2) Monitoring with little or no notice and
3) 3) Grants financial management training (withholding).
4) A special condition will be placed on the award requiring the entity to submit a corrective action plan to address the systemic issues identified in their Single Audit and verify that they have not been referred to the US Treasury Offset program.
5) Finally, a special condition will be placed on the award requiring that the entity submit a copy of their general ledger when they submit their Federal Financial Report.

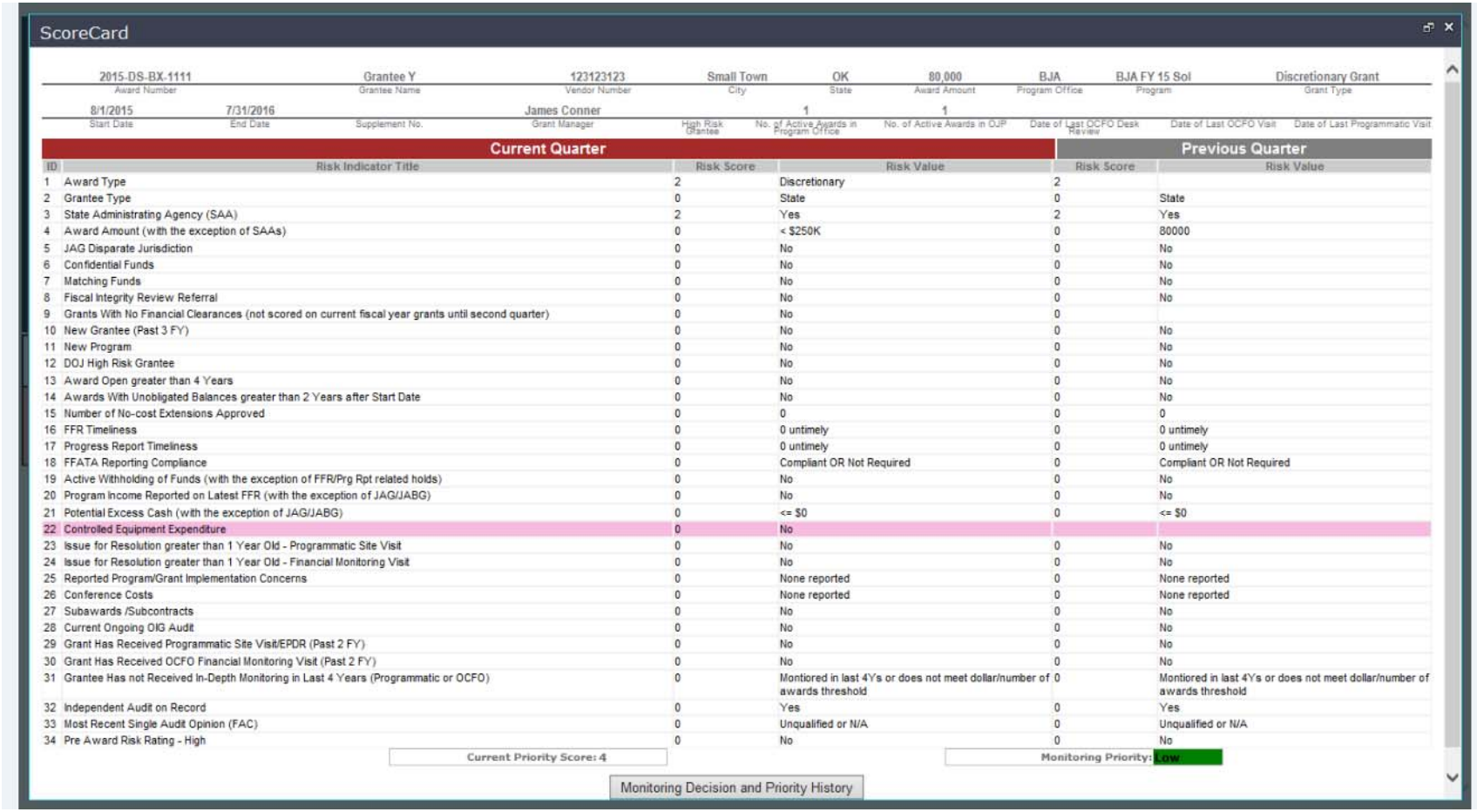
Array the scores and determine risk categories



Array the scores and determine risk categories



Array the scores and determine risk categories



ScoreCard

Award Number	Grantee Name	Vendor Number	City	State	Award Amount	Program Office	Program	Grant Type
2015-DS-BX-1111	Grantee Y	123123123	Small Town	OK	80,000	BJA	BJA FY 15 SoI	Discretionary Grant

Start Date	End Date	Supplement No.	Grant Manager	High Risk Grantee	No. of Active Awards in Program Office	No. of Active Awards in OJP	Date of Last OCFO Desk Review	Date of Last OCFO Visit	Date of Last Programmatic Visit
8/1/2015	7/31/2016		James Conner		1	1			

		Current Quarter		Previous Quarter	
ID	Risk Indicator Title	Risk Score	Risk Value	Risk Score	Risk Value
1	Award Type	2	Discretionary	2	
2	Grantee Type	0	State	0	State
3	State Administrating Agency (SAA)	2	Yes	2	Yes
4	Award Amount (with the exception of SAAs)	0	< $250K	0	80000
5	JAG Disparate Jurisdiction	0	No	0	No
6	Confidential Funds	0	No	0	No
7	Matching Funds	0	No	0	No
8	Fiscal Integrity Review Referral	0	No	0	No
9	Grants With No Financial Clearances (not scored on current fiscal year grants until second quarter)	0	No	0	
10	New Grantee (Past 3 FY)	0	No	0	No
11	New Program	0	No	0	No
12	DOJ High Risk Grantee	0	No	0	No
13	Award Open greater than 4 Years	0	No	0	No
14	Awards With Unobligated Balances greater than 2 Years after Start Date	0	No	0	No
15	Number of No-cost Extensions Approved	0	0	0	0
16	FFR Timeliness	0	0 untimely	0	0 untimely
17	Progress Report Timeliness	0	0 untimely	0	0 untimely
18	FFATA Reporting Compliance	0	Compliant OR Not Required	0	Compliant OR Not Required
19	Active Withholding of Funds (with the exception of FFR/Prg Rpt related holds)	0	No	0	No
20	Program Income Reported on Latest FFR (with the exception of JAG/JABG)	0	No	0	No
21	Potential Excess Cash (with the exception of JAG/JABG)	0	<= $0	0	<= $0
22	Controlled Equipment Expenditure	0	No		
23	Issue for Resolution greater than 1 Year Old - Programmatic Site Visit	0	No	0	No
24	Issue for Resolution greater than 1 Year Old - Financial Monitoring Visit	0	No	0	No
25	Reported Program/Grant Implementation Concerns	0	None reported	0	None reported
26	Conference Costs	0	None reported	0	None reported
27	Subawards /Subcontracts	0	No	0	No
28	Current Ongoing OIG Audit	0	No	0	No
29	Grant Has Received Programmatic Site Visit/EPDR (Past 2 FY)	0	No	0	No
30	Grant Has Received OCFO Financial Monitoring Visit (Past 2 FY)	0	No	0	No
31	Grantee Has not Received In-Depth Monitoring in Last 4 Years (Programmatic or OCFO)	0	Montiored in last 4Y's or does not meet dollar/number of awards threshold	0	Montiored in last 4Y's or does not meet dollar/number of awards threshold
32	Independent Audit on Record	0	Yes	0	Yes
33	Most Recent Single Audit Opinion (FAC)	0	Unqualified or N/A	0	Unqualified or N/A
34	Pre Award Risk Rating - High	0	No	0	No

Current Priority Score: 4

Monitoring Priority: Low

Monitoring Decision and Priority History

Questions?

Landscape of Human Trafficking In New Mexico

- 2013 Enumerated Crime
- 2015 State Appropriation
- 2016 State Funding Received
- 2016 Meeting With Stakeholders
- 2019 VOCA Funded Transitional Housing

CVRC NEW MEXICO

HECTOR BALDERAS
NEW MEXICO ATTORNEY GENERAL

street SAFE New Mexico

cyfd
New Mexico Children, Youth & Families Department

CVRC NEW MEXICO

505 GET FREE
505 438 3733

THE LIFE LINK

COALITION to STOP VIOLENCE AGAINST NATIVE WOMEN

La Piñon
575-526-3437

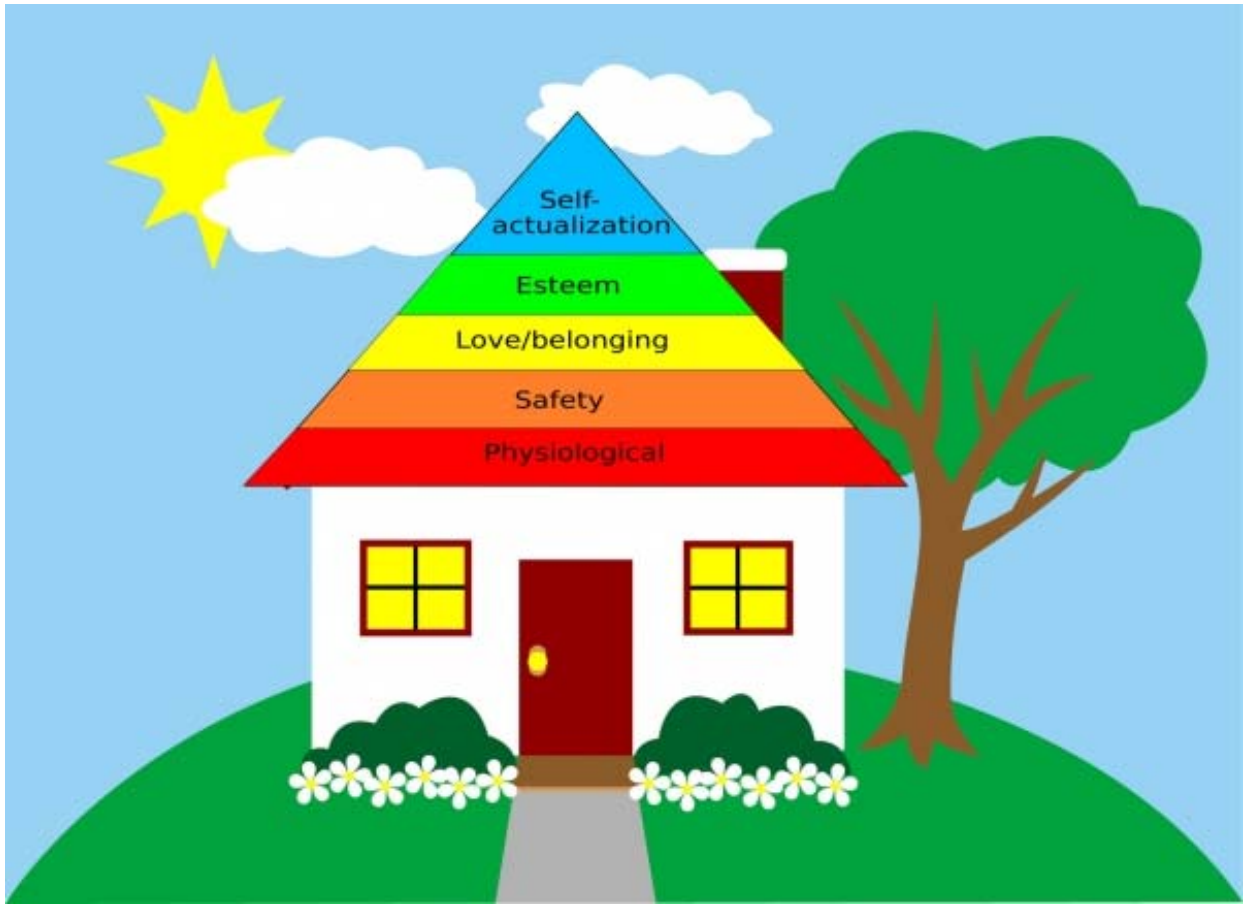
POLICE DEPT.

HUMAN TRAFFICKING
NEW MEXICO
TASK FORCE

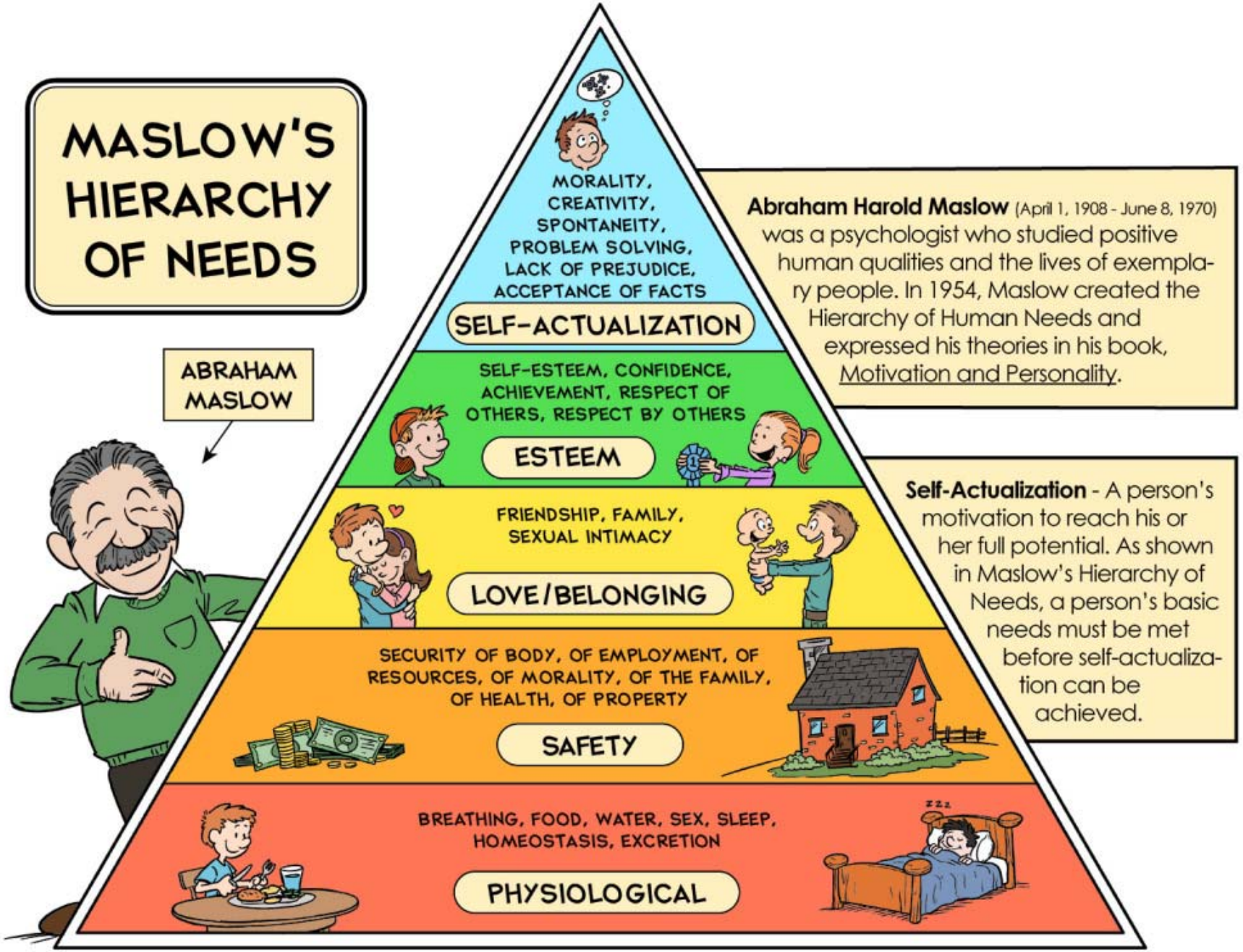
NMILC
NEW MEXICO IMMIGRANT LAW CENTER

Barrier Free Access To Housing

creating a safe base for recovery



MASLOW'S HIERARCHY OF NEEDS



Abraham Harold Maslow (April 1, 1908 - June 8, 1970) was a psychologist who studied positive human qualities and the lives of exemplary people. In 1954, Maslow created the Hierarchy of Human Needs and expressed his theories in his book, Motivation and Personality.

Self-Actualization - A person's motivation to reach his or her full potential. As shown in Maslow's Hierarchy of Needs, a person's basic needs must be met before self-actualization can be achieved.

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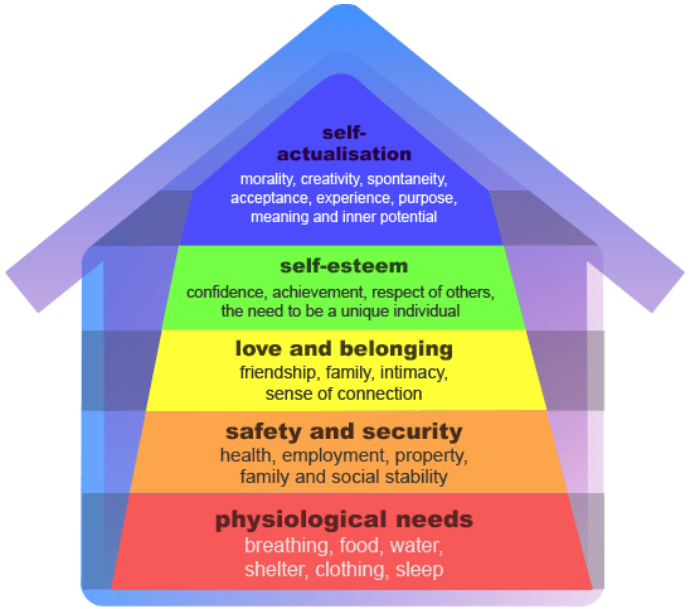
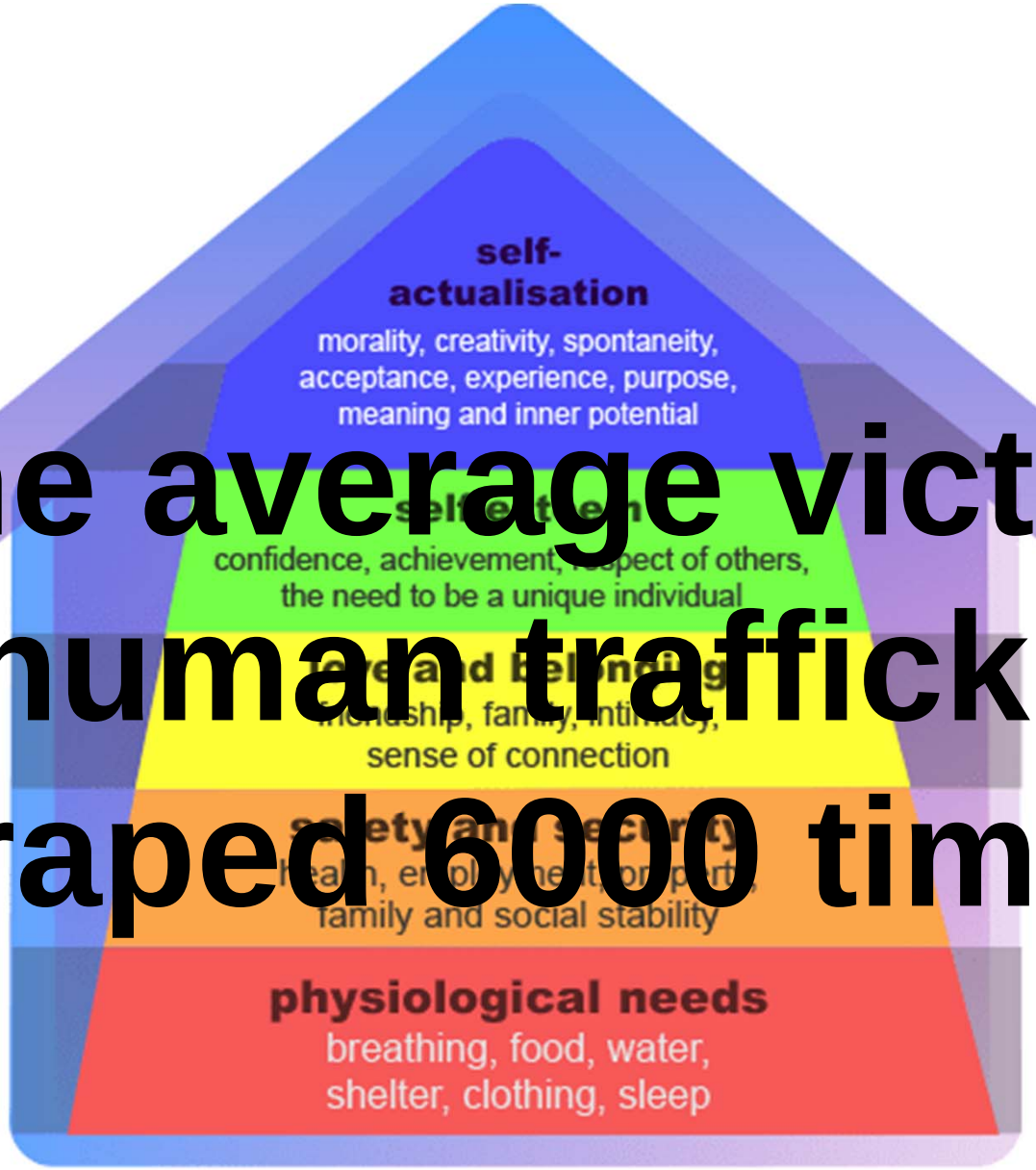
A recent United Nation reports shows that world wide, human trafficking is on the rise and taking on “horrific dimensions”, with sexual exploitation of victims the main driver. Children now account for 30 per cent of those being trafficked, and far more girls are detected than boys.

Housing = Safety

- **Barrier free/low barrier housing for human trafficking survivors is a best practice:**

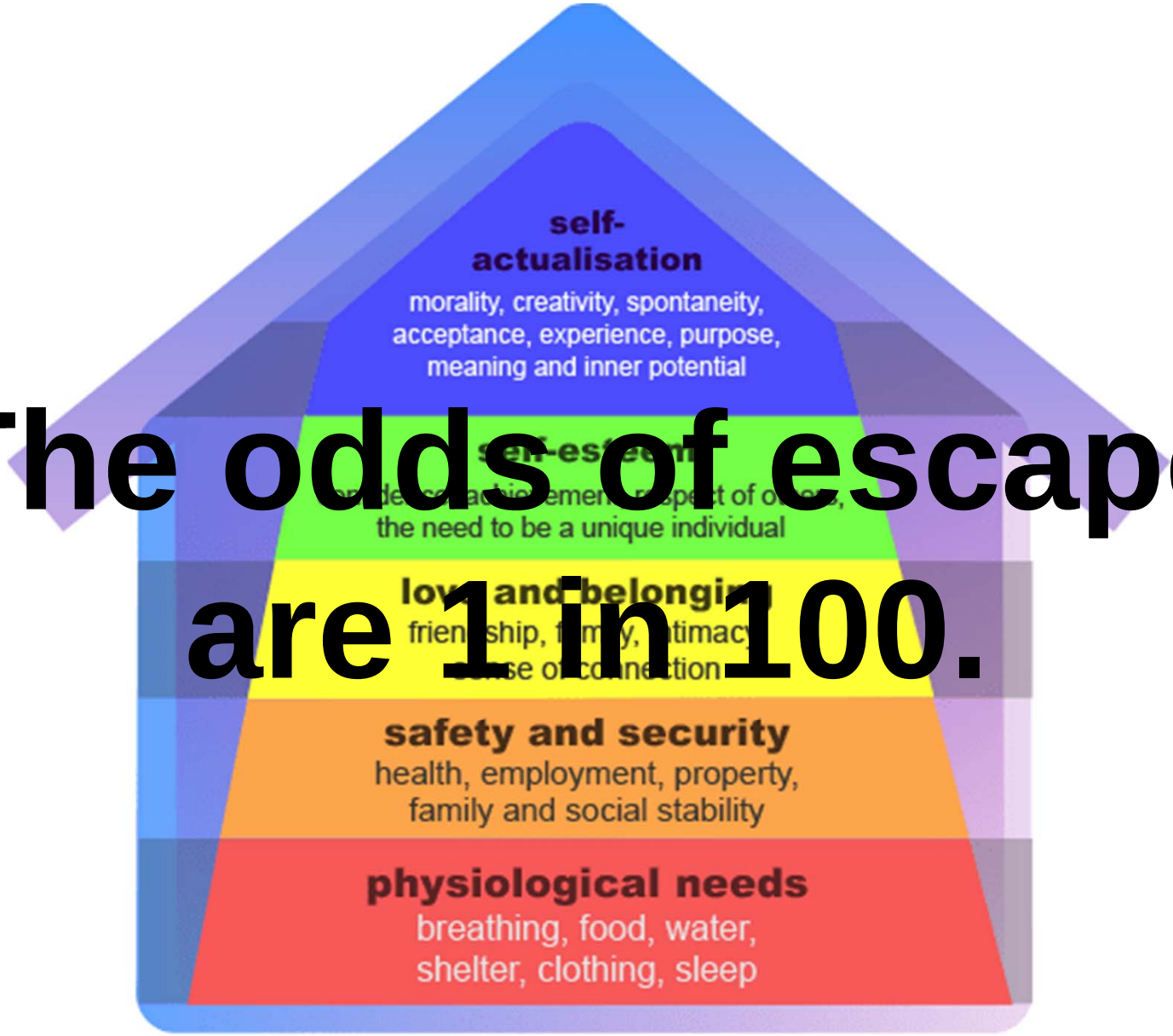


“Addressing trafficking at the root level also means breaking the cycle of poverty and homelessness that causes many women, children, and men to become vulnerable to traffickers.” ~ IntoFreedom.org

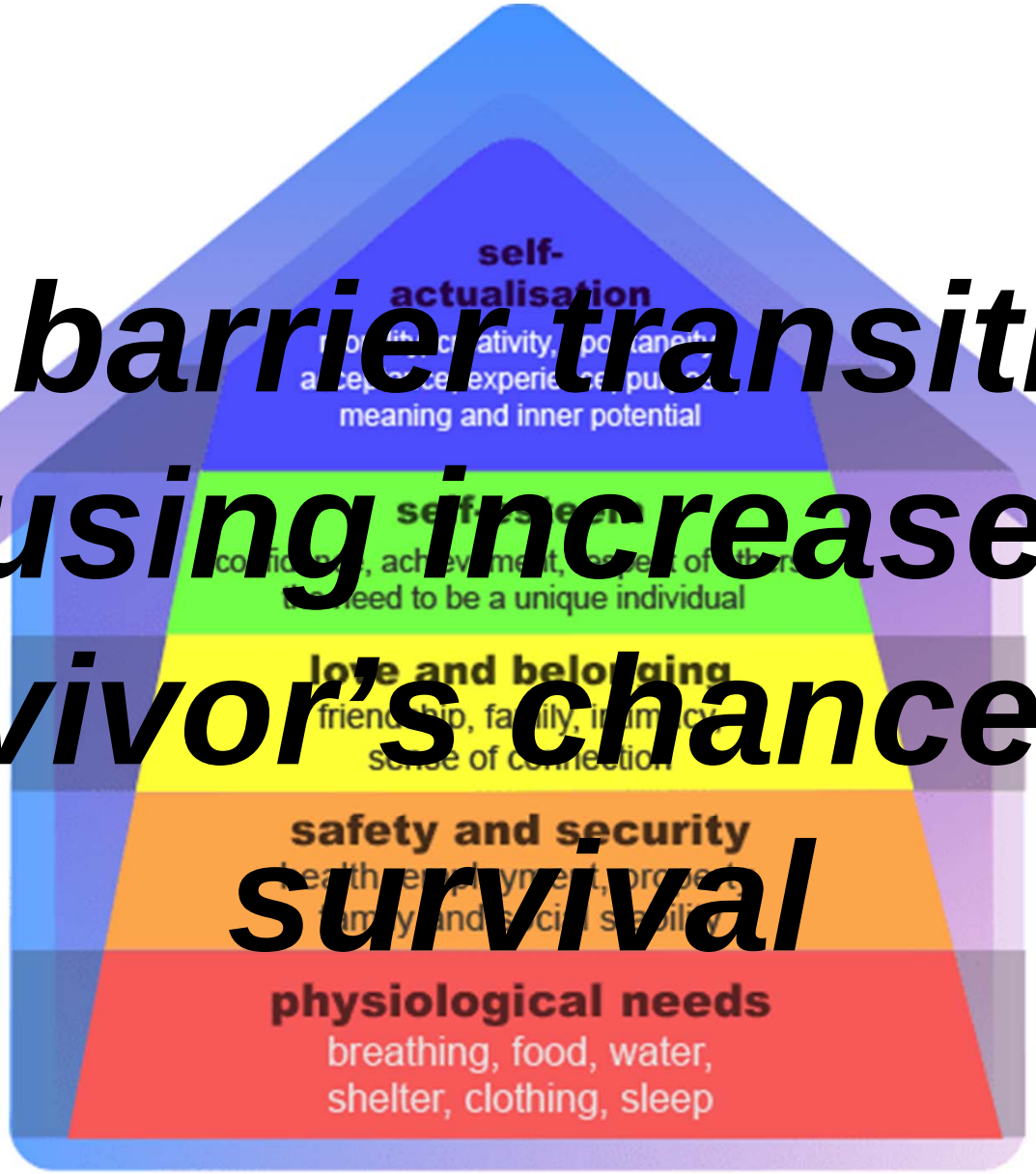


The average victim of human trafficking is raped 6000 times.

The life expectancy for sex trafficking victims is 7 years.



The odds of escape are 1 in 100.



Low barrier transitional housing increases a survivor's chances of survival

FORCED TO WORK OR SELL SEX AGAINST YOUR WILL?

¿FORZADO A TRABAJAR O VENDER SEXO CONTRA SU VOLUNTAD?

In New Mexico CALL or TEXT

Help · Information · Resources

Ayuda · Informacion · Recursos

THE LIFE LINK

0:00 / 0:04

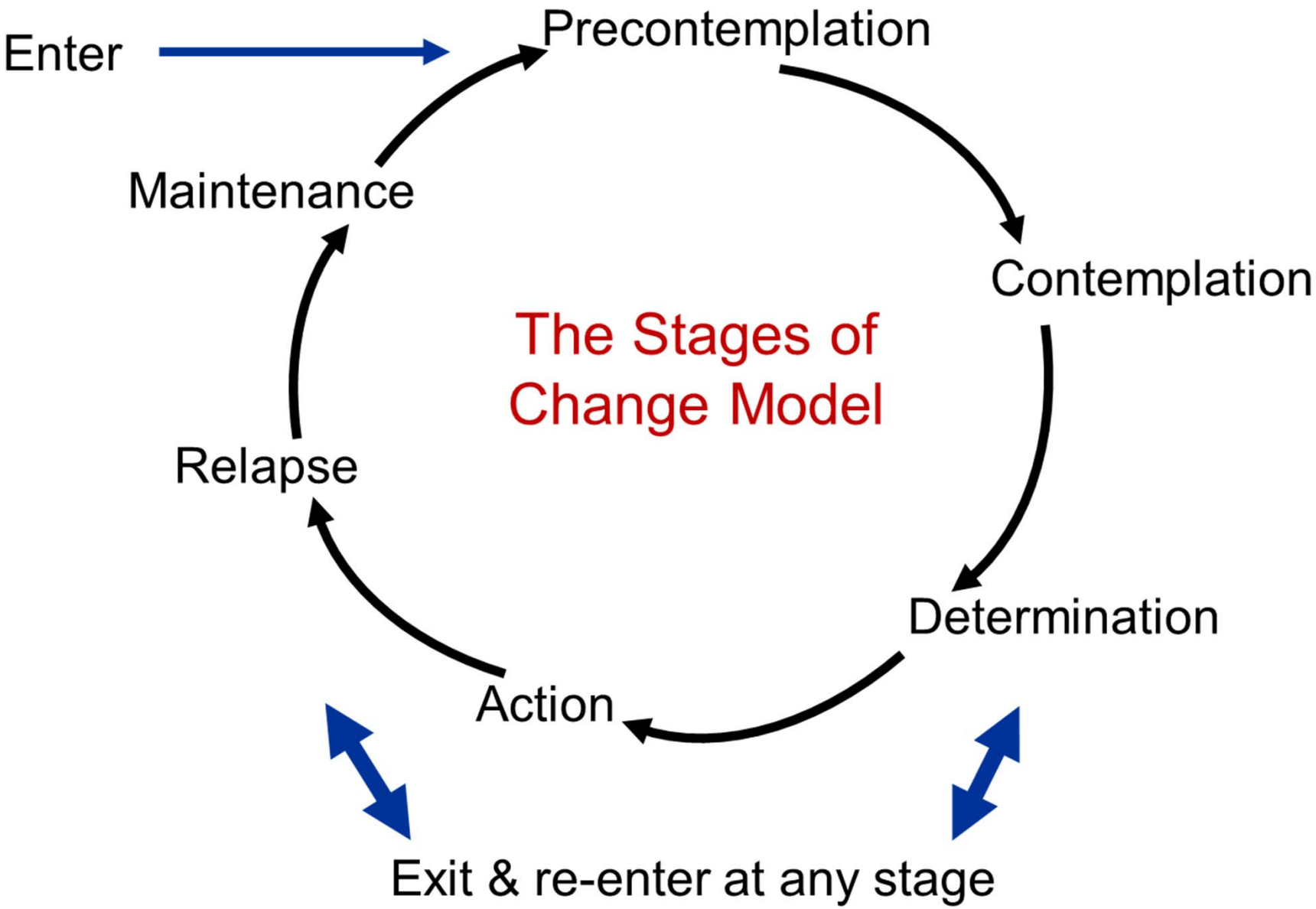
Ready for housing? Survivors struggle with trauma responses such as hyper-vigilance, avoidance, dissociation, fear of traffickers and their accomplices, lack of boundaries, poor decision making, and severe depression. This makes housing, even safe house placement, challenging for survivors and staff.

- Survivors present with Emergent Mental Health, Chronic and Complex Trauma and Substance Use Disorders

Challenges and considerations:

- Debilitating trauma
- Lack of trust
- Loss of community and support systems
- Trauma and torture
- Stigma
- Substance abuse as coping and medicating trauma

- Honor survivor stages of change/recovery


Enter
Precontemplation
Contemplation
Determination
Action
Relapse
Maintenance
The Stages of Change Model
Exit & re-enter at any stage

- Access to emergency shelter using motels when needed. Not ideal but critical during emergency.

- 11 safe house rooms (3+ months if needed) in 4 scattered site units across Albquerque and Santa Fe. (funded by CVRC and DOJ)

- 30 Transitional Housing units statewide (up to 2 years): Provider expectations of independence, self sufficiency, community integration align with client choice, meeting them where they are, and a willingness to build a recovery plan from there.

- Connection to The Life Link housing for long term needs.

Housing is a way out of trafficking and into safety.

- **Supportive housing service offerings:** safe house, transitional housing, therapy, psychiatry, PSR, healthcare, case management, and advocacy.

- **Rights-Based/Client Choice:** Survivors must be allowed to set their own pace for engagement, services, and goal setting.

- Case management and advocacy are the supporting base of safety and recovery, allowing for provisions of safety, food, sleep, clothing, etc., on the hierarchy of needs. These are the deficit areas and healing doesn’t really happen until these needs are met. Be prepared for difficulty as client trauma subsides, and SA declines, as trauma response symptoms will emerge, making work challenging and often creating crisis situations around housing.

Recovery: A process of change through which individuals improve their health and wellness, live a self-directed life, and strive to reach their full potential. Major dimensions that support a life in recovery, as defined by SAMHSA, the Substance Abuse and Mental Health Services Administration, include:

- ***Health:*** *o*vercoming or managing one's disease(s) as well as living in a physically and emotionally healthy way.

- ***Home:*** a stable and safe place to live.

- ***Purpose****:* meaningful daily activities, such as a job, school, volunteerism, family caretaking, or creative endeavors, and the independence, income, and resources to participate in society.

- ***Community:*** relationships and social networks that provide support, friendship, love, and hope.

Keep the door of recovery open

- Time unlimited and judgment free recovery services are challenging but crucial for client survival.

Enforcing safety rules while not creating barriers to survivor success is challenging but possible. If clients must be removed from safe house, due to safety issues, advocates will continue to work with them on housing goals.

- Utilize harm reduction approach

- Broken Danger Detector - keep expectations realistic for where the client is in recovery, choices they make (even the wrong ones), and problems around safety in the home.

- Housing support minor DMST survivors:

- Provide support services and housing around responsible adult, such as grandparent, parent, sibling, etc. This reduces displacement and institutional trauma to the minor.

Homelessness is a life threatening condition.

This slide is in memory of young girls/women, aged 17 - 21, that we remember every day because they lost their lives while homeless. Homelessness is the greatest vulnerability.

Safety for clients and advocates/caseworkers:

- Have safety protocols in place
- Call 911
- Assume every situation is potentially dangerous
- Pay attention to vicarious trauma

- intofreedom.org
- https://news.un.org/en/story/2019/01/1031552
- https://www.samhsa.gov
- ovcttac.gov
- www.505getfree.org
- 505-GET-FREE (438-3733) text or call for resources, information and referrals

JGII What is it and How Will it Effect You

OVERVIEW AND UPDATE ON JGII PROGRESS

JUSTICE GRANTS
INNOVATION INITIATIVE

VOCA ADMINISTRATOR MEETING
NOVEMBER 6, 2019

JAMES M. SIMONSON
KATHRINA PETERSON

Justice Grants Innovation Initiative (JGII) Background

What is JGII?

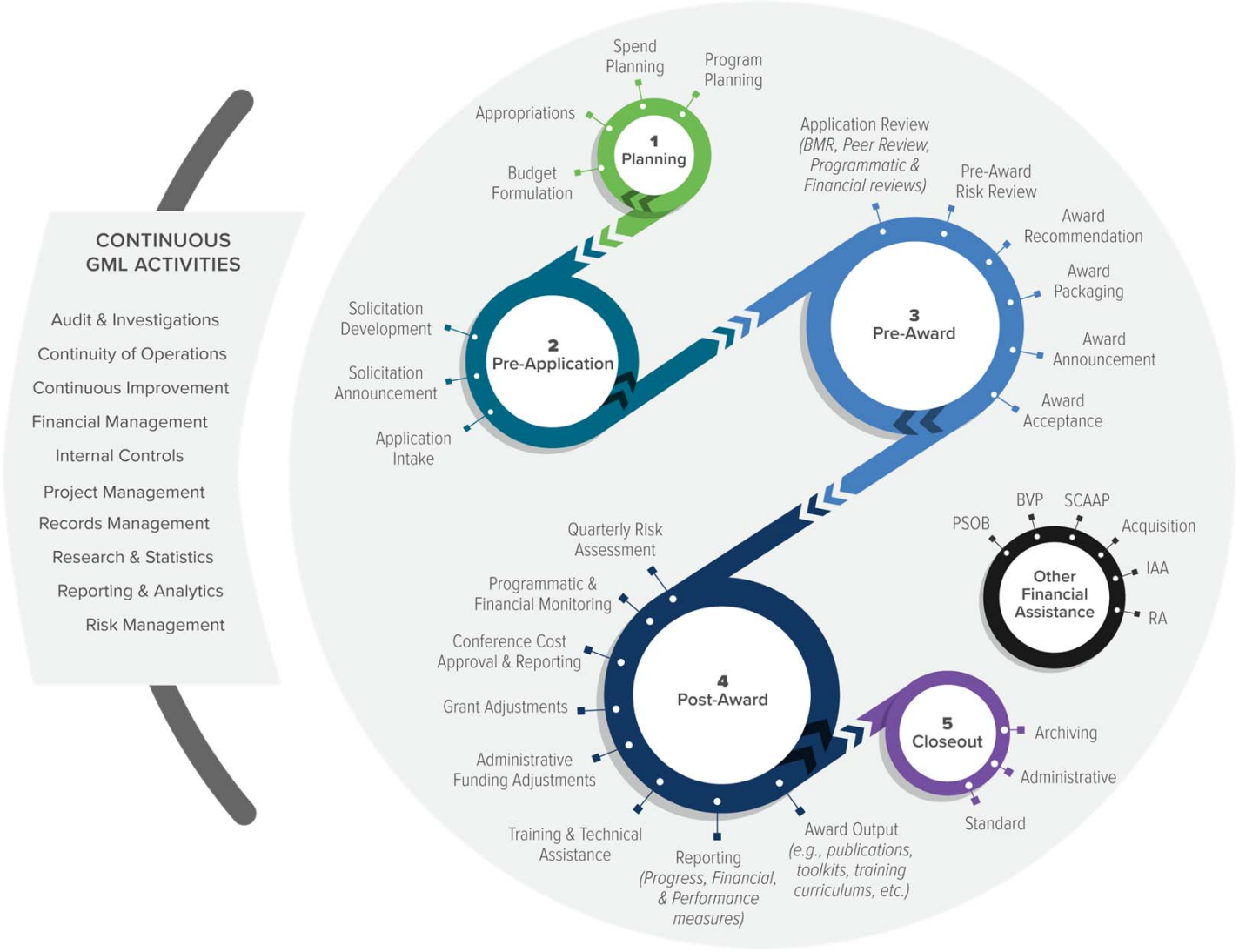
JGII is an opportunity for OJP to take a broader look at our business processes, even beyond grants and cooperative agreements. This is a unique opportunity to transform how we work and use data at an enterprise level, and how we serve the American public. This initiative goes beyond technology, it is an opportunity for us to reinvent the way we do business.

Why are we doing this?

OJP has launched this initiative for the following reasons:

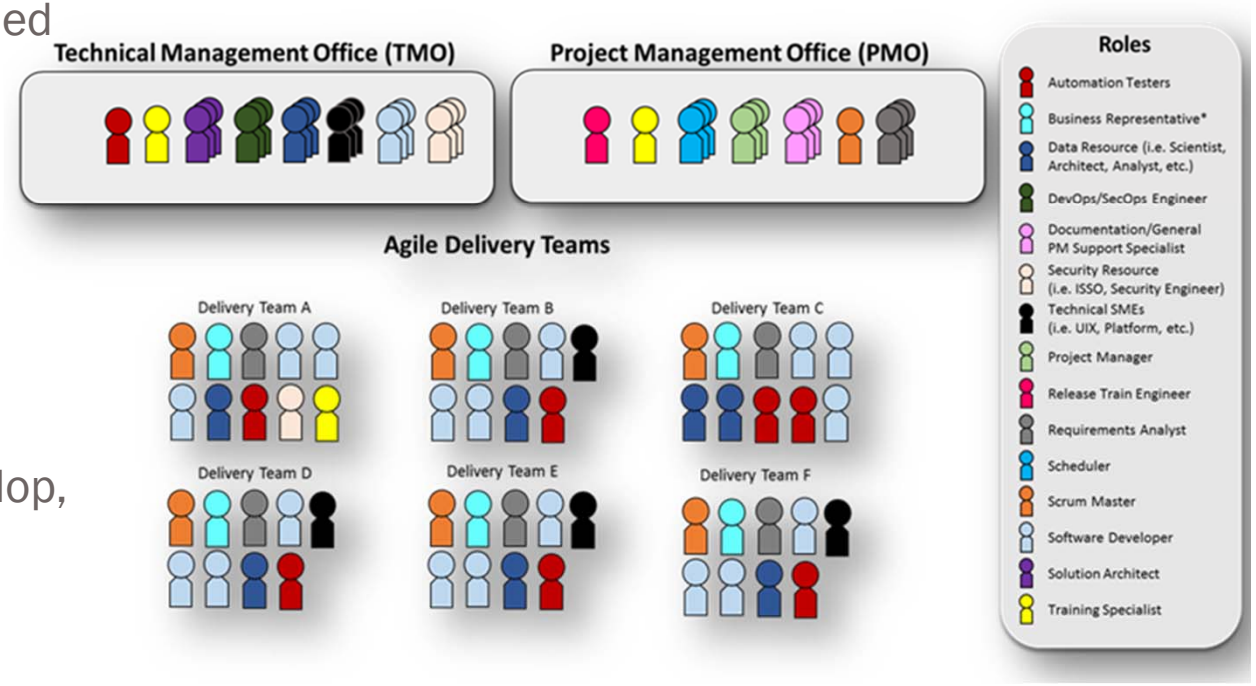
- Our business processes have evolved and systems do not fully support the work we do.
- We're challenged in accessing data, and lack the ability to analyze data at an enterprise level.
- We're driving toward shared services and breaking down silos.
- To keep up with modern innovations, we must promote a model of continuous improvement.
- We're building flexibility and agility into our processes and solutions to respond to new requirements.

Grants Management Lifecycle



Agile Delivery Tea

- Cross-functional with diversified skill sets
- Consists of a Scrum Master, Business Representative, Requirements Analyst, and technical staff (developers, testers, etc.)
- Teams will continuously develop, integrate production-ready deliveries, have synchronized sprint schedules

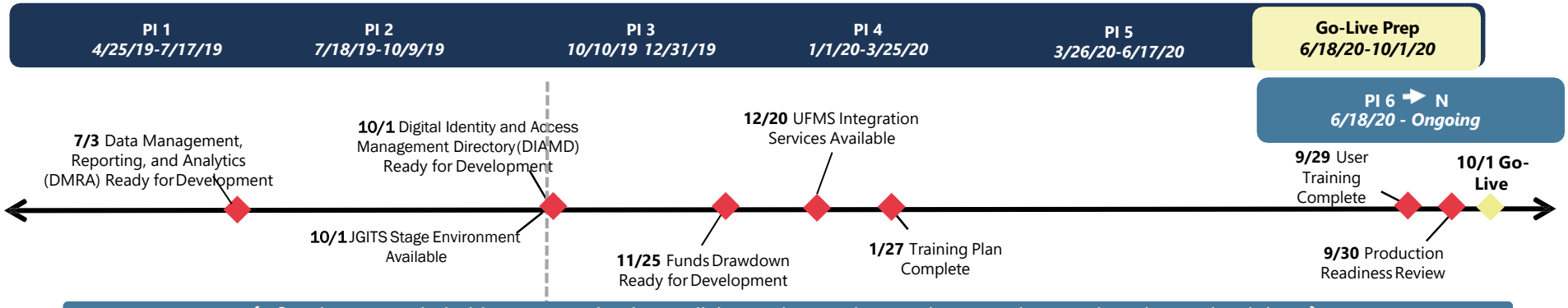


- The teams will also hold joint agile ceremonies (such as planning meetings, sprint reviews, retrospectives, and integrated system demos) to promote continuous collaboration.

Feature-Level Updates

Justice Grants IT Solution Roadmap as of 9/26/2019

NOTE: Features will continue to be refined throughout each Program Increment (PI) and are subject to change and further breakdown.



← Continuous stakeholder communication, policies and procedure updates, and user education and training →

PI 1 Development Accomplishments

PI Start:
3 Teams
4 Features Planned

PI End:
3 Teams
5 Features Completed

PI 2 Development Accomplishments

PI Start:
4 Teams
13 Features Planned

PI End:
6 Teams
13 Features Completed

PI 3 Development Planned

PI Start:
6 Teams
32 Features Planned
•4 UFMS
•3 ASAP
•7 IdAM Data Migration
Organizational Readiness

PI End Planned:
6 Teams
1 Data Team

PI 4 Development Forecasted

PI Start:
7 Teams
50 Features Forecasted
Data Migration
Organizational Readiness
- Training
- Communications
- Change Management

PI 5 Development Forecasted

PI Start:
7 Teams
35 Features Forecasted
Data Migration
Organizational Readiness
- Training
- Communications
- Change Management

Program Increment 1 Commitments

Committed Features
Create Solicitation Template
Initiate Application in Grants.gov
Manage Solicitation-Specific Questions
Create Web-Based Disclosure of Pending Applications and Project Timeline
Create Web-Based Budget Detail

Program Increment 2 Commitments

Committed Features
Business Rules of Solicitation Templates Sections and Sub-sections
Initiate Solicitation
Review and Approve Solicitation
Establish Entity Profile with Associated Org Facilitator and Authorized Rep
Integrate Grants.gov to gather submitted SF-424 information
Establish Application Structure
Create Web-Based Budget Detail
Create Federal Financial Reports (FFR) Form
Create Award Package
Manage Repository of Standard Application Forms and Attachments

PI 3: Planned Business Features

Epic	Feature
Solicitation Process	Review and Approve Workflow
	Publish Solicitation
	Cancel and Modify Published Solicitation
Application Submission	Complete Application
	Create Goals, Objectives, and Deliverables Web-Based screen
	Submit Application
Application Review	Move Applications through Peer Review Status
	Move Applications through Programmatic Review
	Basic Minimum Requirements (BMR) Review
Internal User Experience	Internal Homepage / Dashboard
	Internal User Homepage / Dashboard
External User Experience	Entity Homepage/ Dashboard
	External User Homepage/ Dashboard
	Add Awards and Award Modifications Data to External User Homepage/ Dashboard

PI 3: Planned Business Features

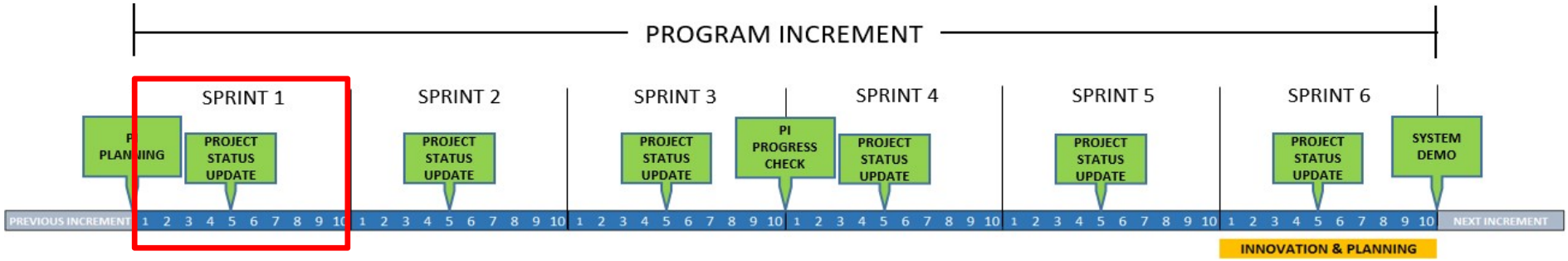
Epic	Feature
Funding Recommendation and Award Package Generation	Create Funding Recommendation Case for Competitive Solicitations
	Populate Funding Recommendation Data
	Select Applications for Funding Recommendation
	Funding Recommendation Approval Process
	Business Logic for Award Package and Award Document
	Pull Award Package Data into the Award Documentation
	Add/Edit Accounting Data to Individual Applications Recommended for Award
	Award Acceptance
	Initiate Financial Non-Withholding Award Modifications

PI 3: Planned Technical Features

In addition to the planned business features, JGII has also planned to complete a number of technical features. This includes:

- Integration between the Justice grants IT solution and UFMS, as UFMS will become available for integration services on December 20th
- Integration between the Justice grants IT solution and the Automated Standards Application for Payment (ASAP)
- Finalize and execute on the Data Migration Plan
- Finalize and execute on the Organizational Readiness Plan
- Execute on Security Requirements

Timeline



Program Increment 3 (10/10/19 - 12/31/19)

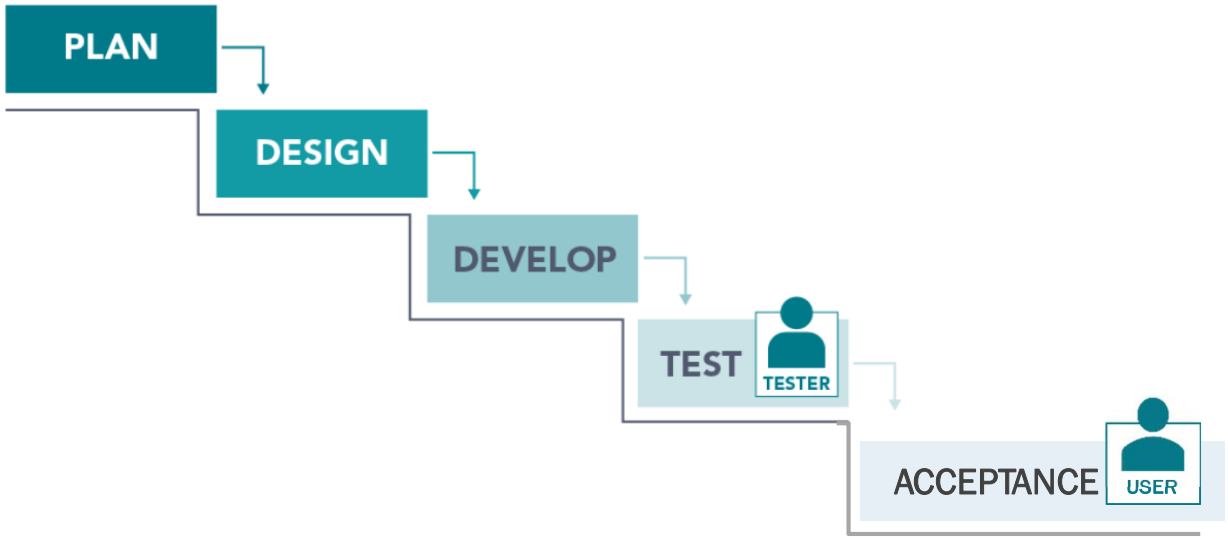
- Sprint 3.1 (10/18/19 – 10/23/19)
- Sprint 3.2 (10/24/19 – 11/6/19)
- Sprint 3.3 (11/7/19 – 11/20/19)
- Sprint 3.4 (11/21/19 – 12/4/19)
- Sprint 3.5 (12/5/19 – 12/18/19)
- Sprint 3.6 (12/19/19 – 1/1/20)
- Sprint 3.7 (1/2/20- 1/15/20)

Program Increment 4 (1/16/20 – 3/25/20)
Program Increment 5 (3/26/20 – 6/17/20)

User Acceptance Testing Framework

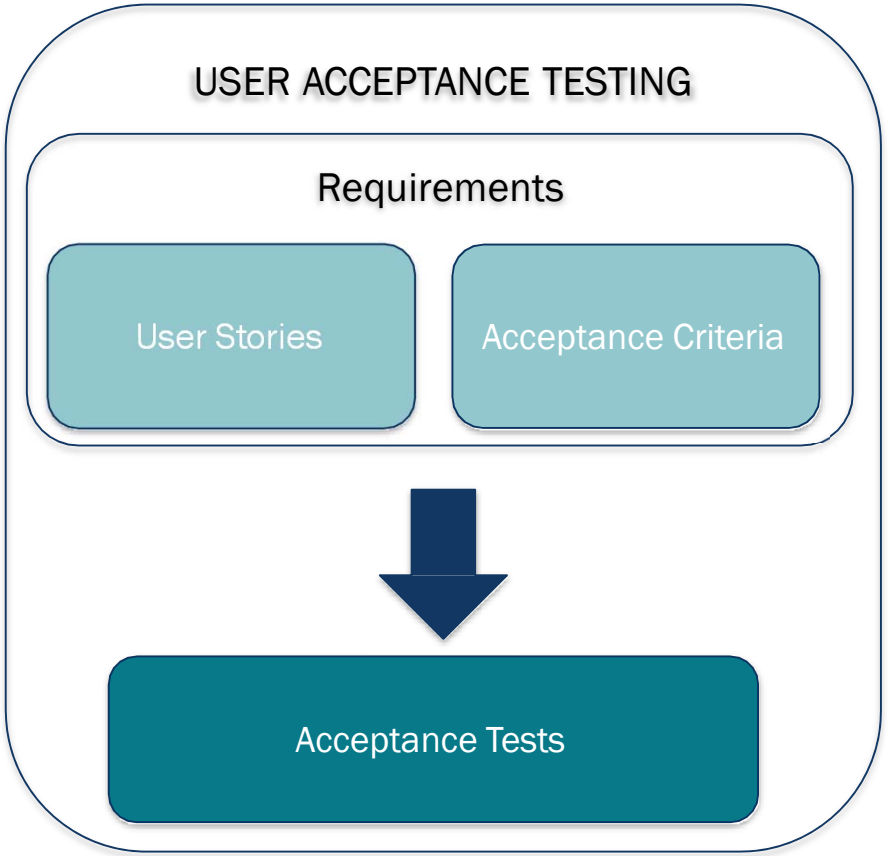
Typical Waterfall User Acceptance Testing (UAT)

Traditionally, in waterfall methodologies, UAT doesn't occur until the end of development, closer to the delivery date.

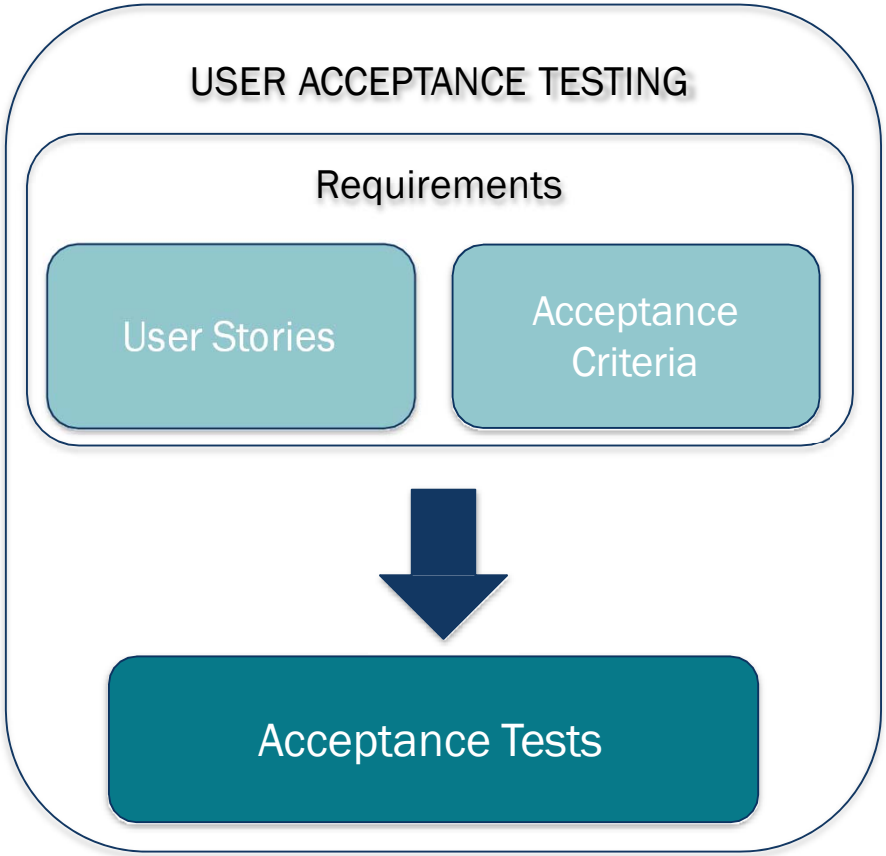


The risk with this approach is simple: end users are not brought in until the end of the project, and developed solution and capabilities that the end user community really needs, or are of the highest priority, are not delivered.

User Acceptance in Agile



JGITS UAT Framework



Additional JGITS Efforts

- ✚ Hands - on testing sessions
- ✚ Demos at SME Group Meetings
- ✚ Demo Day at the end of the Program Increment
- ✚ Focus Group Discussions
- ✚ Feedback Collection

Next Steps

Next Steps

- Establish two separate OVC Advisory Board of Administrators/Staff (Assistance and Compensation) to help inform system changes that will impact you.
- Add SAA Staff to future user testing as the new system's features are developed.
- Engage Advisory Board Members in discussions related to performance measures and products developed related to performance measures.

Questions?

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Definition of Monitoring +

Monitoring Requirements of the Rule and Federal Oversight Agencies +

Common Areas Addressed +

Links +

Sample Documents

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- Additional tools and resources can be found on the NAVAA website.

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Definition of Monitoring

A dictionary definition of monitoring is to "observe and check the progress or quality of (something) over a period of time; [to] keep under systematic review." For VOCA State Assistance Administrators, the overall purpose of monitoring is to ensure the provision of effective victim assistance services through successful subrecipient performance. Monitoring provides reasonable assurance that the subrecipient has administered the funding in compliance with the laws, regulations, and provisions of the award *and* that the required performance goals are being achieved. Monitoring that is conducted without training, technical assistance, coaching, and concern is incomplete.

From audits by the Office of the Inspector General and the Office of the Chief Financial Officer, we know that states and territories often encounter challenges in the following areas—

- Goals and objectives are not measurable
- No staff and volunteer time and attendance reports/activity logs
- Employee time and attendance reports do not show the appropriate allocation across funding sources
- VOCA-funded staff are not familiar with the grant
- Late reports
- Lack of required expense documentation
- Failure to keep separate accounting of VOCA funds
- Professional services contracts/invoices are not specific or sufficiently detailed for VOCA purposes
- Procurement policies lack detail; inventory is incomplete

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Monitoring Requirements of the Rule and Federal Oversight Agencies −

In this section, the rules and regulations on the monitoring of victim assistance subawards are outlined with accompanying monitoring best practices, questions to ask, documents to review, strategies to resolve deficiencies, etc.

Written Monitoring Plan–Required by Federal Guidance (28 CFR 94.106, 2 CFR 200.301 and 331)

The monitoring plan must include—

- Post-award risk assessment process
- Regular desk reviews (routine or enhanced)
- Onsite visits at least once every 2 years, unless a different frequency is set based on risk assessment results (it is recommended that new grantees are monitored onsite within the first year)
- Retention of documents that record general subrecipient compliance and site visit results
- Description of how grant managers will follow up with any deficiencies and findings
- List of tools that will be used consistently across all subrecipients.

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Common Areas Addressed −

This section offers lists of administrative, programmatic, and financial items grant managers may want to review or address through the monitoring process: questions to ask, documents to review, strategies to resolve deficiencies, etc.

Administrative

- A complete, official grant file (paper or electronic) includes application, signed award document, special conditions compliance, and all grant reports and drawdown requests.
- Policies and procedures that address: financial management and compliance with consultant daily rate maximums; scrutiny of suspension and debarment of vendors and contractors; and adherence to procurement and sole-source regulations, time and attendance, etc.
- Source documents that show employee/volunteer time and attendance (i.e., signed timesheets—actual hours worked on the grant, not just a percentage—and pay records).
- Compliance with special conditions.

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Links –

The links below will direct you to the sites referenced most often for monitoring purposes.

- VOCA Assistance Program- Final Rule
- Uniform Administrative Guidance
  - 2 CFR 200
    - FAQs for 2 CFR 200
  - 2 CFR 200.205- Federal awarding agency review of risk posed by applicants
  - 2 CFR 200.207- Specific Conditions
  - 2 CFR 200.301- Performance Management

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Collapse All

Title	Resource
Risk Assessment Hide Summary	[Excel 108KB] [PDF 108KB]
▪ It is important to consider the full funding environment in context to set suitable risk level thresholds. For example, an award range of $25,000 to $300,000 will lead to different thresholds than an award range of $100,000 to $1,000,000 (see Fiscal Risk Measures- Award Amount). ▪ Once a risk assessment has been completed for each subrecipient, create a new document that shows all subrecipient scores, in score order, to help determine the appropriate score ranges for the low, moderate, and high risk categories (see Overall Risk Score Key).	
Onsite Monitoring Check List and Tool Hide Summary	[Word 108KB] [Word 108KB] [PDF 108KB] [PDF 108KB]
It is important to add any compliance components specific to your state or territory.	